

June 28, 2021

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0002

Title: Disaster Assistance Registration

Form Number(s):

FF-104-FY-21-123 (formerly FEMA Form 009-0-1T (English)), Tele-Registration, Disaster Assistance Registration

FF-104-FY-21-123-A (formerly FEMA Form 009-0-1T (Spanish)), Tele-Registration, Registro Para Asistencia De Desastre

FF-104-FY-21-123-COVID-FA (formerly FEMA Form 009-0-1T-COVID-FA (English)), Tele-Registration, COVID-19 Funeral Assistance

FF-104-FY-21-125 (formerly FEMA Form 009-0-1Int (English)), Internet, Disaster Assistance Registration

FF-104-FY-21-125-A (formerly FEMA Form 009-0-2Int (Spanish)), Internet, Registro Para Asistencia De Desastre

FF-104-FY-21-122 (formerly FEMA Form 009-0-1 (English)), Paper Application / Disaster Assistance Registration

FF-104-FY-21-122-A (formerly FEMA Form 009-0-2 (Spanish)), Solicitud en Papel / Registro Para Asistencia De Desastre

FF-104-21-128 (formerly FEMA Form 009-0-3 (English)), Declaration and Release

FF-104-21-128-A (formerly FEMA Form 009-0-4 (Spanish)), Declaración Y Autorización

FF-104-FY-21-127 (formerly FEMA Form 009-0-5 (English)), Manufactured Housing Unit Revocable License and Receipt for Government Property

FF-104-FY-21-127-A (formerly FEMA Form 009-0-6 (Spanish)), Las Casas Manufacturadas Unidad Licencia Revocable y Recibo de la Propiedad del Gobierno

Request for Information (RFI)

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief

explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The *Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)*, *Public Law 93-288, as amended*, is the legal basis for the Federal Emergency Management Agency (FEMA) to provide financial assistance and services to individuals applying for disaster assistance benefits in the event of a federally-declared disaster. Regulations in *44 CFR § 206.110 – § 206.120 - Federal Assistance to Individuals and Households* implements the policy and procedures set forth in Section 408 of the *Stafford Act*, *42 U.S.C. 5174*, as amended. This program provides financial assistance and, if necessary, direct assistance to eligible individuals and households who, as a direct result of a major disaster or emergency, have uninsured or under-insured, necessary expenses and serious needs, and are unable to meet such expenses or needs through other means. Individuals and households applying for assistance must provide information detailing their losses and needs through this information collection.

FEMA developed this Supporting Statement to support an extension, without change, of the revisions approved via Emergency Request on March 23, 2021. The revisions approved via Emergency Request were a result of the Consolidated Appropriations Act, 2021 signed into law on December 27, 2020, which allocated FEMA up to two billion dollars to provide individuals and households with Coronavirus (COVID-19)-related funeral assistance.

Section 408(e) of the Stafford Act, the Other Needs Assistance (ONA) provision of the Individuals and Households Program (IHP) provides financial assistance to address disaster-related medical, dental, funeral, childcare, personal property, transportation, and other necessary expenses or serious needs resulting from a major disaster. For FEMA to provide assistance within IHP, the President must declare an emergency or major disaster.

On March 13, 2020, the President declared a nationwide COVID-19 emergency pursuant to Section 501(b) of the Stafford Act. All 50 states, the District of Columbia, and five territories have been approved for COVID-19 major disaster declarations.

Individuals and households that are affected by disasters, and apply for assistance, must provide specific information detailing their losses and needs caused by the declared disaster. As a result of the Coronavirus Response Relief Supplemental Appropriations Act and the American Rescue Plan Act, 2021, to be considered for COVID-19 Funeral Assistance, applicants who are responsible for a deceased individual's funeral expenses must contact FEMA to complete a disaster assistance registration.

Prior to initiating the registration process, Call Center staff will inform the individual that the call is related to COVID-19 Funeral Assistance and will ask the applicant to verbally verify that they are the individual responsible for COVID-19 related funeral expenses. If the applicant indicates they are not the responsible individual, they will be advised to please have the responsible individual call in to register. If the applicant would still like to continue the registration process, they may, but will be advised if multiple applicants apply for the same deceased individual (i.e., when the responsible individual applies as well), there will be a delay in processing assistance.

FF-104-FY-21-123-COVID-FA (Telephone, English) – COVID-19 Funeral Assistance will continue to be utilized to accept COVID-19 Funeral Assistance registrations. A dedicated Call Center phone number was created with the sole purpose of accepting COVID-19 Funeral Assistance registrations, with Call Center staff trained to use the FF-104-FY-21-123 script currently approved by OMB for COVID-19 Funeral Assistance. Staff provide clarifying statements where needed to indicate to the applicants how the current questions and responses in the disaster assistance registration script relate to COVID-19 Funeral Assistance.

Once the information is collected through FF-104-FY-21-123-COVID-FA, the applicant's responses are electronically transferred to the National Emergency Management Information System (NEMIS), where the information is stored, and processed according to the legal and administrative policies and procedures.

At the end of the registration process, the applicant will be advised they will need to provide a death certificate for the deceased individual indicating COVID-19 as the cause of death; documentation to include receipts or a funeral contract indicating the cost of the funeral expenses incurred, the date funeral expenses were incurred, confirmation the funeral was for the deceased individual, and the name of the person who paid for the funeral; and to provide documentation showing the amounts paid by other sources including funeral or burial insurance or any assistance provided by a state agency, voluntary agency, or other sources. The applicant will also be sent a Request for

Information (RFI) letter through their preferred correspondence method (e-correspondence or postal mail) outlining the requested documentation.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

Currently, the information gathered within this collection is used to determine if the individual is in a Federally declared disaster area and whether they have disaster-caused necessary expenses or serious needs that are unable to be met through other means.

As a result of this extension, FEMA will continue to utilize FF-104-FY-21-123-COVID-FA to accept COVID-19 Funeral Assistance registrations in accordance with the Consolidated Appropriations Act, 2021.

FF-104-FY-21-123 (Telephone, English) and FF-104-FY-21-123-A (Telephone, Spanish) – When a Federally declared disaster or emergency occurs, a tele-registration 800 number is published for individuals to call and apply for assistance. A FEMA service representative interviews individuals over the telephone utilizing the questions in this information collection and records the information directly into the electronic copy of FF-104-FY-21-123 or FF-104-FY-21-123-A in FEMA’s National Emergency Management Information System (NEMIS) database.

FF-104-FY-21-123-COVID-FA (Telephone, English) – As a result of the Consolidated Appropriations Act, 2021, a dedicated Call Center phone number was created for applicants to apply for COVID-19 Funeral Assistance. The currently approved FF-104-FY-21-123 disaster assistance registration script is used, with staff trained to clarify for applicants how the current questions relate to COVID-19 Funeral Assistance.

FF-104-FY-21-125 (Internet, English) and FF-104-FY-21-125-A (Internet, Spanish) – When a Federally declared disaster or emergency occurs, a website is published for individuals to apply for disaster assistance through www.DisasterAssistance.gov, which utilizes FF-104-FY-21-125 or FF-104-FY-21-125-A. The information collected is electronically transferred into the NEMIS database.

FF-104-FY-21-122 (Paper, English) and FF-104-FY-21-122-A (Paper, Spanish) – When a Federally declared disaster or emergency occurs, a tele-registration 800 number and disaster assistance website are published for individuals to apply for FEMA assistance. In rare circumstances where the system is inaccessible or telecommunication capabilities are inoperable, FEMA service representatives will record the individual’s information using paper versions of FF-104-FY-21-122 or FF-104-FY-21-122-A. Once

completed and when the system becomes accessible, the FEMA representative manually enters the information into NEMIS.

FF-104-21-128 (English) and FF-104-21-128-A (Spanish) – For FEMA disaster assistance eligibility requirements to be met, a household member must be a citizen, non-citizen national or qualified alien of the United States. FF-104-21-128 or FF-104-21-128-A is used to certify the individual’s information and eligibility. Information gathered in this form is imbedded within FF-104-FY-21-125, FF-104-21-125-A, FF-104-FY-21-123 and FF-104-21-123-A, therefore FF-104-21-128 and FF-104-21-128-A are only utilized in circumstances when FEMA registrations are collected via FF-104-FY-21-122 or FF-104-FY-21-122-A.

FF-104-FY-21-127 (English) and FF-104-FY-21-127-A (Spanish) – Individuals who qualify for Manufactured Housing Units (MHU), such as travel trailers, mobile homes, or other fabricated dwellings through FEMA Direct Temporary Housing Assistance are required to acknowledge and accept conditions for receiving and occupying government property. Once an individual is determined eligible for Direct Temporary Housing Assistance, FEMA uses the information collected in FF-104-FY-21-122, FF-104-FY-21-122-A, FF-104-FY-21-123, FF-104-FY-21-123-A, FF-104-FY-21-125, or FF-104-FY-21-125-A to prepare the *Manufactured Housing Unit Revocable License and Receipt for Government Property* form permitting applicants to use MHUs as temporary housing.

Request for Information (RFI) – RFI letters are currently utilized to gather additional documentation from disaster assistance applicants to verify disaster related losses and to prevent a duplication of benefits (i.e., receiving insurance settlement payments that fully cover the losses and receiving the same financial assistance from FEMA). RFIs are tailored to the applicant’s claimed loss categories (i.e., transportation, moving and storage, medical/dental, child care, etc.), and request information such as vehicle registrations, auto mechanic receipts, and vehicle insurance policies; itemized bills, receipts, or estimates from medical providers, written statements from medical providers confirming injuries or illnesses are disaster-related, and medical insurance policies; itemized receipts, bills, or estimates for moving and storage expenses and insurance settlement letters; proof of income before and after the disaster, proof of child care expenses before and after the disaster, and proof the child care provider is licensed.

As a result of the Consolidated Appropriations Act, 2021, RFIs are utilized to gather COVID-19 funeral expense documentation. The applicants are advised they need to provide a death certificate for the deceased individual attributing COVID-19 to the cause of death; documentation including receipts or a funeral contract indicating the cost of the funeral expenses incurred, the date funeral expenses were incurred, confirmation the funeral was for the deceased individual, and the name of the person who paid for the funeral; and to provide documentation showing the amounts paid by other sources

including funeral or burial insurance or any assistance provided by a state agency, voluntary agency, or other sources, if applicable.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

An individual may register for FEMA IHP assistance via www.DisasterAssistance.gov through the internet using a personal computer or internet-capable mobile device, by calling FEMA's 800 toll-free number, or through submission of a paper registration via a FEMA representative. All registration methods are processed through NEMIS in the same manner. NEMIS is an integrated database system used to provide FEMA, states, territories, tribal governments, and other Federal agencies with automation and record storage capabilities to perform disaster and non-disaster operations.

As a result of the Consolidated Appropriations Act, 2021, COVID-19 Funeral Assistance registrations are only accepted through use of a dedicated Call Center phone number. Call Center staff will continue to utilize FF-104-FY-21-123-COVID-FA to accept COVID-19 Funeral Assistance registrations as approved via Emergency Request on March 31, 2021.

FF-104-FY-21-123 (Telephone, English) and FF-104-FY-21-123-A (Telephone, Spanish) – The toll-free 800 number allows individuals to register for disaster assistance telephonically with a FEMA representative.

FF-104-FY-21-123-COVID-FA – A dedicated toll-free 800 number was created to allow individuals to register for COVID-19 Funeral Assistance telephonically with a FEMA representative.

FF-104-FY-21-125 (Internet, English) and FF-104-FY-21-125-A (Internet, Spanish) – www.DisasterAssistance.gov allows individuals to register for disaster assistance electronically via the internet.

FF-104-FY-21-122 (Paper, English) and FF-104-FY-21-122-A (Paper, Spanish) – Allows individuals to register for disaster assistance using a paper application.

FF-104-FY-21-128 (English) and FF-104-FY-21-128-A (Spanish) – Allows individuals to complete the Declaration and Release Form, which the individual signs electronically or via paper.

FF-104-FY-21-127 (English) and FF-104-FY-21-127-A (Spanish) – Not applicable to this question as these forms are not currently available for disaster applicants to access online or complete electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information is not collected in any other form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

NEMIS is designed in such a way that small business owners submitting applications for FEMA IHP assistance for federally declared disasters are automatically referred to the Small Business Administration (SBA) for disaster assistance.

COVID-19 Funeral Assistance applicants will not be referred to SBA since Funeral Assistance is provided to individuals and households, not small businesses.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Information in this collection is only gathered when the President declares a major disaster or emergency for FEMA Individual Assistance. To provide disaster assistance to individuals and households within a Presidentially declared area, this information must first be collected to validate individuals' claims of eligibility for applicable federal program requirements.

The consequence of not collecting the COVID-19 Funeral Assistance information is that FEMA would be unable to provide Funeral Assistance to individuals and households and would therefore be in violation of the Consolidated Appropriations Act, 2021.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

(c) Requiring respondents to submit more than an original and two

copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The circumstances contained in item 7 are not applicable to this information collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on April 12, 2021, at 86 FR 19001. **No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on July 22, 2021, at 86 FR 38730. The public comment period is currently open until August 23, 2021.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Disaster applicants continually relay their feedback to FEMA through Voluntary Agency Liaisons, Disaster Recovery Center staff members, IA Liaisons, Congressional inquiries, etc. FEMA and external partners routinely perform audits pertaining to the registration intake questions and process.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Given the national emergency caused by COVID-19, it would be impractical and contrary to the public health – and, by extension, the public interest – to delay implementing the renewal of this information collection until after FEMA has formally consulted with persons outside of the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

FEMA has not completed any consultations with representatives of those from whom information is to be obtained or those who must compile records for the same reason as listed above, but has received feedback from interested stakeholders. Ongoing discussions between FEMA and Congressional leaders, as well as with the Center of Disease Control, have helped inform the policy pertaining to the collection of COVID-19 related death information through the registration intake process.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

FEMA does not provide payments or gifts to respondents in exchange for benefits.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A Privacy Threshold Analysis (PTA) for 1660-0002 was approved on February 26, 2020. A PTA outlining the usage of FF-104-FY-21-123 (formerly FEMA Form 009-0-1T) for COVID-19 Funeral Assistance was approved on February 8, 2021. This collection is supported by the existing System of Records Notice (SORN): DHS/FEMA-008 Disaster Recovery Assistance Files of Record dated April 30, 2013. The Privacy Impact Assessment (PIA) supporting this collection is *DHS/FEMA/PIA-049 Individual Assistance Program*.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

Based on historical data from 2007 through 2019 utilizing Croston's Method for intermittent demand forecasting, it is estimated 938,800 individuals will apply for IHP assistance annually.

According to the U.S. Center for Disease Control and Prevention (CDC), there were 344,497 COVID-19 deaths as of December 31, 2020. However, more individuals may apply for the assistance; therefore, it is estimated 500,000 applicants will apply COVID-19 Funeral Assistance as a result of the Consolidated Appropriations Act, 2021.

The number of individuals estimated to use the FEMA 1-800 Tele-Registration number to complete **FF-104-FY-21-123** or **FF-104-FY-21-123-A** is 181,900. The Tele-Registration process takes approximately 22 minutes (0.3667 hours) to complete and the total annual hour burden is 66,703 hours.

The number of individuals estimated to use the FEMA COVID-19 Funeral Assistance 1-800 Tele-Registration number to complete **FF-104-FY-21-123-COVID-FA** is 500,000. The Tele-Registration process takes approximately 22 minutes (0.3667 hours) to complete and the total annual hour burden is 183,350.

The currently approved Tele-Registration script will continue to be utilized for COVID-19 Funeral Assistance, with Call Center staff members providing clarifying statements where appropriate regarding how the questions in the script relate to COVID-19 Funeral Assistance. The Tele-Registration response fields will be utilized in the following manner to capture COVID-19 Funeral Assistance related data:

- **Damaged Dwelling Address** field: Used to indicate the address where the deceased individual passed away
- **County/Parish/Municipality Where the Damage Occurred** field: Used to indicate the County/Parish/Municipality where the deceased individual passed away
- **Date When the Damage Occurred** field: Used to indicate when the COVID-19 funeral expenses were incurred
- **Medical/Dental/Funeral or Burial Insurance** field: Used to indicate any Funeral or Burial Insurance, and any assistance provided by another source (i.e. State, voluntary organization, etc.)
- **Name, SSN, and Date of Birth** fields in the **Occupants** section: Used to indicate the name, date of birth, and SSN of each Deceased Individual(s)

At the end of the registration process, the applicants are advised they will need to provide a death certificate for the deceased indicating COVID-19 attributed to the cause of death; documentation including receipts or a funeral contract indicating the cost of the funeral expenses incurred, date funeral expenses were incurred, confirmation the funeral was for the deceased individual, and the name of the person who paid for the funeral; and to provide documentation showing the amounts paid by other sources including funeral or burial insurance or any assistance provided by a state agency, voluntary agency, or other sources, if applicable, in order to manually compare and ensure a duplication of benefits does not occur. The applicants are also sent a **Request for Information (RFI)** letter outlining the requested documentation.

The number of individuals using the Internet to complete **FF-104-FY-21-125** or **FF-104-FY-21-125-A** is estimated to be 756,600. The Internet registration process takes approximately 22 minutes (0.3667 hours) for an individual to complete, and the total annual hour burden is 277,445 hours.

The number of individuals using the paper versions of **FF-104-FY-21-122** or **FF-104-FY-21-122-A** is estimated to be 2,300. The Paper registration process takes approximately 20 minutes (0.3333 hours) to complete, and the total annual hour burden is 767 hours.

It is estimated 2,300 individuals will complete **FF -104-FY-21-128** or **FF-104-FY-21-128-A** once they have registered for disaster assistance by completing FF-104-FY-21-122 or FF-104-FY-21-122-A. This is a result of individuals being unable to apply for disaster

assistance via the internet through tele-registration. It takes approximately two minutes (0.0333 hours) for individuals to review and sign FF-104-FY-21-128 or FF-104-FY-21-128-A, and the total annual hour burden is 77 hours.

The number of individuals completing **FF-104-FY-21-127** or **FF-104-FY-21-127-A** is estimated at one percent (9,388) of the total number of individuals registering for disaster assistance. Historically, approximately one percent of the total annual number of applications for disaster assistance results in awarding Direct Temporary Housing Assistance. It takes approximately 15 minutes (0.25 hours) for individuals to review and sign FF-104-FY-21-127 or FF-104-FY-21-127-A, and the total annual hour burden is 2,347 hours.

The number of individuals who will be issued FEMA **Request for Information (RFI)** correspondence to obtain further information to adequately determine eligibility for standard IHP assistance is estimated at 52,000. The number of individuals estimated to be issued FEMA RFIs for COVID-19 Funeral Assistance is 500,000.

In relation the COVID-19 Funeral Assistance, the RFI letters request the following information:

- A death certificate for the deceased indicating COVID-19 attributed to the cause of death;
- Documentation including receipts or a funeral contract indicating the cost of the funeral, payment date, confirmation the funeral was for the deceased individual, and the name of the person who paid for the funeral; AND
- If the deceased received assistance from another source to include funeral or burial insurance, or any assistance for the funeral was provided by a state agency, voluntary agency, or other sources, documentation must be provided showing the amounts paid by these entities specifically for funeral costs.

It takes approximately 10 minutes (0.1667 hours) for individuals to review and respond to RFIs. Combined, it is estimated 552,000 RFIs will be issued, with a total annual hour burden of 92,019 hours.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in Hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or Households	Tele-Registration Application for Disaster Assistance (English and Spanish) FF-104-21-123 and FF-104-21-123-A	181,900	1	181,900	0.3667	66,703	\$39.25	\$2,618,093
Individuals or Households	Tele-Registration Application for COVID-19 Funeral Assistance (English) FF-104-21-123-COVID-FA	500,000	1	500,000	0.3667	183,350	\$39.25	\$7,196,488
Individuals or Households	Internet Application for Disaster Assistance (English and Spanish) FF-104-FY-21-125 and FF-104-FY-21-125-A	756,600	1	756,600	0.3667	277,445	\$39.25	\$10,889,716
Individuals or Households	Paper Application for Disaster Assistance (English and Spanish) FF-104-FY-21-122 and FF-104-FY-21-122-A	2,300	1	2,300	0.3333	767	\$39.25	\$30,105
Individuals or Households	Declaration and Release (English and Spanish) FF-104-FY-21-128 and FF-104-FY-21-128-A	2,300	1	2,300	0.0333	77	\$39.25	\$3,022

Individuals or Households	Manufactured Housing Unit Revocable License and Receipt for Government Property (English and Spanish) FF-104-FY-21-127 and FF-104-FY-21-127-A	9,388	1	9,388	0.2500	2,347	\$39.25	\$92,120
Individuals or Households	Request for Information (RFI) (English and Spanish)	552,000	1	552,000	0.1667	92,018	\$39.25	\$3,611,707
Total		2,004,488		2,004,488		622,707		\$24,441,251

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45¹. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2020 Occupational Employment and Wage Estimates wage rate for All Occupations (SOC 00-0000) is \$27.07. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$39.25 per hour. Therefore, the annual burden hour cost is estimated to be \$26,011,289 (\$39.25 x 622,707 hours).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, December 2020.” Available at https://www.bls.gov/news.release/archives/ecec_03182021.pdf. Accessed March 23, 2021. The wage multiplier is calculated by dividing total compensation for all workers of \$38.60 by wages and salaries for all workers of \$26.53 per hour yielding a benefits multiplier of approximately 1.45

² Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: <https://www.bls.gov/oes/tables.htm>

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [350 remote local hire personnel performing Tele-Registration at \$20 per hour for 10 hours per day for 180 days] $350 \times (20 \times 10 \times 180) =$ \$12,600,000	
[2,500 Contractor personnel performing Tele-Registration for COVID-19 Funeral Assistance 5 days a week for 1 year. The Tele-Registration phone line will be available for applicants to contact 12 hours per day] Total contract cost for contractor agent labor for 1 year = \$143,588,280]	\$156,188,280
$\$12,600,000 + \$143,588,280 = \$156,188,280$	
Staff Salaries [193 GS 9, step 5 employees ¹ at \$46.88 ($\32.33×1.45) ² per hour for 10 hours per day for 180 days] $193 \times (\$46.88 \times 10 \times 180)$	\$16,286,112
Facilities [Average of \$42 per square foot for approximately 35,000 sq ft to lease a temporary Disaster Assistance Tele-Registration Center] $42 \times 35,000$	\$1,470,000
Computer Hardware and Software [350 FEMA workstations provided to local hire personnel to perform Tele-Registration at \$2,886 per workstation. Workstation costs include laptop, monitors, adapters, keyboard, mouse, desk phone and headset with applicable accessories] $350 \times 2,886 = \$1,010,100$	\$28,528,076
[For COVID-19 Funeral Assistance, the contractor will be responsible for providing all computer hardware and workstation set up including laptop or desktop and monitor. The vendor will also provide the telephony set up including call routing capabilities and the soft phone for the contracted agents] Total contract cost for Computer Hardware and Software for 1 year = \$27,517,976	

$\$1,010,100 + \$27,517,976 = \$28,528,076$	
Equipment Maintenance [Estimated 10% of the computer hardware and software cost] $1,010,100 \times .10$	\$101,010
Travel [10 FEMA employees at \$6,500 per employee to travel to a remote site for 2 weeks to provide start-up assistance and orientation for supervisory personnel managing the temporary Disaster Assistance Tele-Registration Center. Estimate includes airfare, hotel, rental car, meals and incidentals] $10 \times 6,500$	\$65,000
Printing [\$15 to print 500 copies of FF-104-FY-21-122 and FF-104-FY-21-122-A to send to 14 Disaster Recovery Centers in the event Internet and Tele-Registration are inaccessible.] 15×14	\$210
Postage [Cost to mail 938,800 copies of FF-104-FY-21-122 to individuals at \$0.55 per mailing based on annual registration projects.] $938,800 \times .55$	\$516,340
Other [Cost of security badges for 350 local hire personnel at \$93.39 per security profile setup and badge creation.] 350×93.39	\$32,687
Total	\$203,187,715
¹ Office of Personnel Management 2021 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf . Accessed March 25,2021.	
² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference

Tele-registration Application for Disaster Assistance (English and Spanish) FF-104-FY-21-123 and FF-104-FY-21-123-A	66,703	0	0	0	0	0
Tele-registration Application for COVID-19 Funeral Assistance (English) FF-104-FY-21-123-COVID-FA	0	+183,350	+183,350	0	0	0
Internet Application for Disaster Assistance (English and Spanish) FF-104-FY-21-125 and FF-104-FY-21-125-A	277,445	0	0	0	0	0
Paper Application for Disaster Assistance (English and Spanish) FF-104-FY-21-122 and FF-104-FY-21-122-A	767	0	0	0	0	0
Declaration and Release (English and Spanish) FF-104-FY-21-128 and FF-104-FY-21-128-A	77	0	0	0	0	0
Receipt of Government Property (English and Spanish) FF-104-FY-21-127 and FF-104-FY-21-127-A	2,347	0	0	0	0	0
Request for Information (RFI) (English and Spanish)	8,688	+92,019	+83,331	0	0	0
Total	356,027	+266,681	+266,681	0	0	0

Explain:

The burden hour change is a result the Emergency Request approved as a result of the Consolidated Appropriations Act, 2021 to implement a COVID-19 Funeral Assistance registration process. Specifically, the modified use of 009-0-1T, Tele-Registration as new instrument FF-104-FY-21-123-COVID-FA increased burden hours by 183,350 due to the estimated number of individuals who will apply for COVID-19 Funeral Assistance, and the RFI hours increased by 92,019 due to the documentation required to verify COVID-19 funeral expenses and to prevent a duplication of benefits.

FF-104-FY-21-123 (Telephone, English) and FF-104-FY-21-123-A (Telephone, Spanish) – No change to burden hours due to COVID-19 Funeral Assistance.

FF-104-FY-21-123-COVID-FA – Increased burden hours by 183,350 due to implementing a COVID-19 Funeral Assistance registration process which utilizes the currently approved FF-104-FY-21-123 script in a modified manner.

FF-104-FY-21-125 (Internet, English) and FF-104-FY-21-125-A (Internet, Spanish) – No change to burden hours due to COVID-19 Funeral Assistance.

FF-104-FY-21-122 (Paper, English) and FF-104-FY-21-122-A (Paper, Spanish) – No change to burden hours due to COVID-19 Funeral Assistance.

FF-104-FY-21-128 (English) and FF-104-FY-21-128-A (Spanish) – No change to burden hours due to COVID-19 Funeral Assistance.

FF-104-FY-21-127 (English) and FF-104-FY-21-127-A (Spanish) – No change to burden hours due to COVID-19 Funeral Assistance.

Request for Information (English and Spanish) – Increased burden hours by 92,019 due to the estimated number of applicants for COVID-19 Funeral Assistance and the requirement to submit documentation to verify COVID-19 funeral expenses and prevent a duplication of benefits.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
[Form Name/#]						
Total	\$0	\$0	\$0	\$0	\$0	\$0

Explain: N/A – There is no Annual Cost Burden associated with this collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no outline plans for tabulation and publication of data for this information collection.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

FEMA will display the expiration date for OMB approval of this information collection.

**18. Explain each exception to the certification statement identified in Item 19
“Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

There is no statistical methodology involved in this collection.