

November 17, 2021

**Supporting Statement for
Paperwork Reduction Act Submissions**

OMB Control Number: 1660-NW132

Title: FEMA-Administered Disaster Case Management Intake Form

Form Number(s): FEMA Form FF-104-FY-21-146 – Administered

DCM Intake Form

FEMA Form FF-104-FY-21-147 – Consent Form

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.

Section 426 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Pub. L. 93-288, as amended and codified at 42 U.S.C. § 5189d is the legal basis for the Federal Emergency Management Agency (FEMA) to provide case management services to victims of major disasters to identify and address unmet needs. As part of its disaster response and recovery mission, FEMA may provide services itself, issue an agreement with another Federal agency or contract with a non-profit or commercial organization to implement a FEMA-administered Disaster Case Management (DCM) program. FEMA-administered DCM services include assessing disaster-caused unmet needs; screening to gather necessary information on the survivor’s specific unmet needs; providing information and referral to resources to address unmet needs; and providing

outreach and triage at FEMA-designated locations where survivors gather. FEMA, or an agent of FEMA, assists survivors in developing a preliminary disaster recovery plan and advocating for the resources needed to address their unmet needs. As defined in the agreement or contract, the agent is performing case management functions on behalf of FEMA.

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.

The information gathered within this collection form is used to determine the survivor's disaster-caused unmet needs, what types of referrals the case manager may provide, and ensuring the survivor is able to progress in their recovery. When a case manager speaks to the survivor, he or she will ask the survivor a series of data points, outlined within the form, so the case manager can get a better understanding of the survivor's immediate, interim, and long-term needs and can then assist them with planning their recovery and obtaining the resources needed. FEMA-administered DCM case managers may also assist in initiating a personalized disaster recovery plan by assessing unmet needs; helping create goal-oriented plans outlining what initial steps can be taken to recovery; bringing together information and services; and monitoring progress to reach goals. Survivors receive free assistance from case managers on how to access critical resources and on how best to recover from disasters and their aftermath, along with ways to access a variety of available resources from other federal agencies, voluntary agencies, private organizations, and state and local government, including crisis counseling, disaster unemployment, disaster legal assistance, home repair assistance, and voluntary agency services.

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.

When a case manager speaks to the survivor, he or she will ask the survivor a series of questions (data points), outlined within the form, so the case manager can get a better understanding of the survivor's immediate to long-term needs as well as assist them with planning and prioritizing the steps in their recovery and obtaining the resources needed.

The information gathered within this collection form (FF-104-FY-21-146) is used to determine the survivor's disaster-caused unmet needs and what types of referrals the case manager may provide to specifically address those needs. Case managers then take the information from the intake form (FF-104-FY-21-146) and type it directly into their proprietary case management secure electronic system of record.

FEMA may provide data elements collected at the time of FEMA registration for federal assistance to individuals and households under Section 408 of the Stafford Act, 42 U.S.C. § 5174, to the agent performing services through an approved Information Sharing Access Agreement (ISAA), providing the agent with a focused population that will benefit from FEMA-administered DCM services. In addition, the agent will not have to expend extra staffing for survivor time in collecting the same information, making it more efficient when the survivor requests these services. An applicant may register for FEMA 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 the submission of a paper registration via a FEMA representative.

Survivors do not have to register for Section 408 FEMA assistance to receive DCM under Section 426 of the Stafford Act. Survivors (regardless of FEMA assistance registration status) that want to participate in DCM may proactively reach out on their own based on the socialization of the services through media and word of mouth or through in-person connection in a disaster recovery location. Information about such survivors may be collected by a case manager through in-person or telephonic means. Once the information has been collected, it will be accessible by all qualified and vetted case managers so that, should the survivor request services when their case manager is unavailable, another case manager can assist them and will not have to re-collect information already provided.

Survivors in need of services may choose to receive only information and referrals or may choose more in-depth case management services. If the survivor opts for the latter, the survivor will sign the FEMA consent form, currently in development, and work with the case manager to create a personalized disaster recovery plan that will allow the case manager and survivor to go more into detail on the disaster-caused unmet needs and the next steps and referrals needed for recovery. For example, if the survivor has a child in need of clothing/shoes, the case manager may collect the child's clothing size and types of clothing needed so they can assist the survivor with finding appropriate resources.

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.

FEMA may provide data elements collected at the time of FEMA registration to its agent, through an approved ISAA, to ensure that FEMA registrants will not have to provide the same information twice. Using the FEMA Registration ID and the FEMA-administered DCM client number as unique identifiers, the agent will review and compare against their system of record to ensure there are no duplicate case files, and to protect the survivor against any potential duplication.

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.

Should the survivor requesting case management services mention that their small business or small entity has a disaster-caused unmet need, the case manager will refer the survivor to the Small Business Administration (SBA) for assistance.

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.

This collected information is gathered only when the President has declared a major disaster for FEMA Individual Assistance (IA) and FEMA provides services itself or executes an agreement with a Federal entity or contracts with a non-profit or commercial organization. In order for FEMA or an agent of FEMA to carry out the FEMA-administered DCM mission and assist survivors following a disaster, the information must be collected from individuals that reside in or were in the IA-designated areas at the time of the incident so the survivor can begin accessing available resources and/or developing their personalized disaster recovery plan in order to pursue their holistic recovery.

Failure to collect this information will result in individuals and families having lengthier timelines to recover and a potential to not recover at all.

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.

Respondent participation is always voluntary and the reporting tempo is driven by disasters and the unmet needs of survivors. If the Respondent so chooses, they may meet with a case manager more frequently than quarterly if they have urgent and critical needs that they would like assistance with, and they feel that meeting more frequently than quarterly is beneficial. For example, if an individual met initially with a case manager to

locate temporary shelter and now needs to find food for their family because the shelter has no kitchen and they have no money to buy food, then they may reach out to their case manager to seek food resources.

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

Respondents do not have to prepare written responses for FEMA-administered DCM services.

(c) Requiring respondents to submit more than an original and two copies of any document.

Respondents are not required 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.

Respondents are not required to retain 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.

This information collection does not involve statistical survey.

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

This information collection does not use statistical data classification.

(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.

This collection does not include a pledge of confidentiality that is not supported by authority established in statute or regulation.

(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.

This collection does not include requests to submit propriety trade secrets or similar confidential information.

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 June 29, 2021, at 86 FR 34266. **No public comments were received.**

A 30-day Federal Register Notice inviting public comments was published on November 17, 2021, at 86 FR 64223. The public comment period is open until December 17, 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.

FEMA frequently works with persons outside of the agency, who serve in a partnership role to facilitate our assistance or to provide other forms of assistance to disaster survivors. For this collection, FEMA has worked in partnership with typical recipients of Federal agreements for FEMA-administered DCM to confirm that all entities are in agreement on the availability of data; frequency of collection; the clarity of instructions and recordkeeping; disclosures; reporting formats; and the data elements to be recorded, disclosed, or reported.

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.

N/A

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 a benefit sought.

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 was completed by the Department of Homeland Security's (DHS) Office of Privacy (PRIV) on March 31, 2021. This collection requires new Privacy Impact Assessment (PIA) and System of Records Notice (SORN) coverage because the current PIA and SORN are inadequate. As of the date of this publication, the new draft SORN is pending with DHS for signature and the new draft PIA is pending with the DHS Privacy Office for review.

FEMA may receive a request from a state to gain access to a disaster survivor's personally identifiable information (PII)/sensitive personally identifiable information (SPII) data generated in a FEMA-administered DCM mission to establish their long-term disaster case management program. The FEMA-administered DCM chosen provider will provide the survivor with a FEMA consent form and may share their information with other entities; new FEMA-administered DCM consent form is in the final drafting stages at FEMA. When case managers refer disaster survivors to a voluntary recovery group as part of the FEMA administered DCM program, the chosen provider may share applicable information, that may include PII, with the voluntary recovery group after the survivor has provided written consent to share. DHS PRIV anticipates that FEMA will develop a FEMA-administered DCM guidance document to outline proper data collection and sharing and to include information technology security requirements.

DHS PRIV concurs that this constitutes a privacy-sensitive system and requires PIA and SORN coverage. Although the PTA is adjudicated with an expiration of one year, this program is not in compliance until the PIA and SORN requirements are completed. These compliance artifacts must be completed to be in compliance with the Privacy Act or E-government Act; current PIA and SORN coverage for other FEMA programs related to assistance is insufficient for the scope of the program's collection. A new PIA regarding Disaster Case Management Program and a new SORN regarding Administered Disaster Case Management are anticipated in order to bring this program into compliance. DHS PRIV will update the adjudication once the PIA and SORN requirements are fulfilled.

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 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.

While a survivor does not have to be registered for FEMA assistance, FEMA uses registration data to predict the number of survivors who may require FEMA-administered DCM services. FEMA estimates that approximately 600,000 people annually will apply and be approved for FEMA assistance and the population to serve for a FEMA-administered DCM would equate to approximately five percent of approved FEMA registrants needing some form of disaster case management services following a major disaster; however, the percentage of those requesting services may vary depending upon the incident. While it is anticipated that each conversation may take up to an hour of the survivor's time, the actual time a survivor may spend speaking to a disaster case manager may vary depending upon the disaster-caused unmet needs they may have, the resources available at the time of intake, and whether the survivor would like to initiate a personalized disaster recovery plan.

Additionally, it is anticipated that half of the respondents will return for follow-up services to address their ongoing unmet needs, but all respondents will complete a FEMA-administered DCM Consent Form (FF-104-FY-21-147).

INTAKE FORM (FF-104-FY-21-146) CALCULATIONS:

It is estimated that in one year, there will be 600,000 registered disaster survivors will be approved for FEMA assistance. FEMA multiples this number by five percent to predict how many survivors may require FEMA-administered DCM services. Calculation:

600,000 approved registrants x 5% requiring case management services = 30,000 respondents completing initial Intake Forms (FF-104-FY-21-146) and Consent Forms (FF-104-FY-21-147).

Of the 30,000 respondents completing initial Intake Forms (FF-104-FY-21-146), it is estimated that half of them will come back for follow-up services to address their ongoing unmet needs. These do not require an additional Consent Form (FF-104-FY-21-147), only time to make any updates to their initial Intake Form status. Calculation:

30,000 initial respondents ÷ 2 = 15,000 respondents returning for follow-up services and reviewing an initial Intake Form (FF-104-FY-21-146).

Therefore, the total number of respondents completing an intake form is based on the number of initial respondents plus the number of respondents returning for follow-up services. Calculation:

30,000 initial respondents + 15,000 respondents returning for follow-up services = 45,000 respondents completing an Intake Form (FF-104-FY-21-146).

CONSENT FORM (FF-104-FY-21-147) CALCULATIONS:

Of the 30,000 respondents completing initial Intake Form (FF-104-FY-21-146) as mentioned above, all 30,000 will complete a Consent Form (FF-104-FY-21-147). The 15,000 who return for follow-up services to address their ongoing unmet needs will not need to complete a second Consent Form, so they are not included in the Consent Form burden. Calculation:

600,000 approved registrants x 5% requiring case management services = 30,000 respondents completing initial Intake Forms (FF-104-FY-21-146) and Consent Forms (FF-104-FY-21-147).

TOTAL ANNUAL BURDEN CALCULATIONS:

The total annual burden hours for all required forms is: 45,000 + 3,000 = 48,000 burden 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 1.46 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 and Households	FEMA-Administered DCM Intake Form / FEMA Form FF-104-FY-21-146	45,000	1	45,000	1	45,000	\$36.38	\$1,637,100
Individuals and Households	FEMA-Administered DCM Consent Form / FEMA Form FF-104-FY-21-147	30,000	1	30,000	0.10	3,000	\$36.38	\$109,140
Total		75,000		75,000		48,000		\$1,746,240

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45.¹ 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.

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 May 12, 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

According to the U.S. Department of Labor, Bureau of Labor Statistics², the May 2020 Occupational Employment and Wage Estimates wage rate for **Community and Social Service Occupation** SOC is 21-0000 is \$25.09. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$36.38 per hour. Therefore, the annual burden hour cost is estimated to be **\$1,746,240** annually ($\$36.38 \times 48,000 \text{ hours} = \$1,746,240$).

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:

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.

There are no costs for operation and maintenance and purchase of services component for respondents.

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 for respondents.

Annual Cost Burden to Respondents or Record Keepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents

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/2020/may/oes_nat.htm

N/A				
Total	\$ 0	\$0	\$0	\$0

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 For 180 days = \$51,000,000 Staff: 80 FTEs x 40 hours p/week x 180 days Travel costs (mileage and per diem) Supplies (i.e., headsets, postage, office supplies) Computer hardware/software Information Technology Staff and License Support for 180 days = \$300,000 [\$51,000,000 + \$300,000 = \$51,300,000]	\$51,300,000
Staff Salaries: Leads (FEMA liaison/Finance and Admin Support/Contract Officer Representative) FEMA Liaison (GS-14, Step 5) \$66.54/hr ¹ x 1.45 ² x 50 hr/week x 26 weeks = \$125,428 F/Admin Support (GS-15, Step 5) \$78.27/hr x 1.45 x 40 hr/week x 26 weeks = \$118,031 COR (GS-13, Step 5) \$56.31/hr x 1.45 x 40 hr/week x 26 weeks = \$84,915 [\$125,428 + \$ 118,031 + \$84,915 = \$328,374]	\$328,374
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel Contract travel costs in contract costs Staff = Two (2) FTEs x Four (4) trips x \$1,500 for travel/per diem = \$12,000	\$12,000
Total	\$51,640,374

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 May 12, 2020.

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 an 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
N/A						
Total	0	0	0	0	0	0

Explain: There are no changes in burden hours, as this is a new collection.

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
N/A						
Total	\$0	\$0	\$0	\$0	\$0	\$0

Explain: There are no changes in cost burden, as this is a new 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.

This collection does not seek approval to not display the expiration date for OMB approval.

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions.”