

February 22, 2022

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.

a. FEMA Individuals and Household Program

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 - *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.

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.

FEMA is required to provide meaningful access to its programs and activities for people with disabilities under Section 504 of the *Rehabilitation Act of 1973* and Section 308 of the *Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)*, Pub. L. 93-288, as amended.

FEMA regulations at 44 CFR Part 16, *Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Federal Emergency Management*

Agency implement Section 504 of the *Rehabilitation Act of 1973, as amended*, and the disability-related nondiscrimination provisions set forth in Sections 308 and 309 of the *Stafford Act*. In addition, Department of Homeland Security (DHS) *Directive Number 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)* issued on September 25, 2013, requires DHS components to provide equal opportunity for qualified individuals with disabilities served or encountered in DHS-conducted programs and activities, including providing any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial or administrative burdens to DHS. Applicants may provide FEMA with documentation about their disability-related access and functional needs that could potentially impact the habitability determination, especially as it applies to the applicant's ability to access the home with a mobility device (e.g., wheelchair, walker, scooter).

b. Coronavirus Response Relief Supplemental Appropriations Act and the American Rescue Plan Act, 2021

On March 13, 2020, the President declared a nationwide COVID-19 emergency pursuant to Sec. 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.

FEMA developed this Supporting Statement to support an extension, without change, of this collection. FEMA recently revised this collection via two Emergency Requests on March 23, 2021 (Funeral Assistance) and August 16, 2021 (Occupancy/Ownership). 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.

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

the 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.

c. Medical and Dental Assistance

FEMA provides financial assistance under the Other Needs Assistance (ONA) provision of the IHP to individuals and households with medical or dental expenses caused by a disaster. Unlike most other forms of IHP assistance, an applicant seeking Medical and Dental Assistance does not need to live in the Presidentially-declared disaster or emergency area to be considered for the assistance, however, their damages must be disaster related. Any person who incurs disaster-caused medical or dental expenses may apply for and, if eligible, receive Medical and Dental Assistance.

Required documentation must indicate the expense was caused by the disaster, is medically- required, and includes the amount of expense.

Disaster-caused injury or illness documentation includes both of the following:

- Itemized bills, receipts, or estimates from the medical or dental provider or pharmacy;
- A written and signed statement from a medical or dental provider, including the date of disaster-caused injury and expenses necessary for recovery

Replacement of prescribed medication documentation includes all the following:

- A written and signed statement by the applicant or the applicant's medical or dental provider verifying the loss was caused by the disaster;
- A written and signed statement from a medical or dental provider verifying the prescription is required and was previously prescribed to the applicant or a household member; and
- Receipts or other verifiable documentation from the pharmacy showing the replacement cost of the prescribed medication

Loss or damage of medical or dental equipment documentation includes all of the following:

- A written and signed statement by the applicant or the medical or dental provider verifying the loss was caused by the disaster;
- A written and signed statement from a medical or dental provider verifying the applicant or household member required the medical or dental equipment prior to the disaster; and
- Itemized bills, receipts, or estimates showing repair or replacement cost of the medical or dental equipment

Required documentation verifying the loss or injury of a service animal includes all the following:

- A written and signed statement by the applicant, medical provider, or veterinary provider verifying the service animal's loss or injury was caused by the disaster;
- A written and signed statement from a medical provider verifying the applicant or household member required the service animal for a disability prior to the disaster;
- A statement from the applicant, medical provider, or other representative explaining the type of task or work performed by the service animal; and
- Itemized bills, receipts, or estimates showing expenses related to the service animal's loss or injury

Finally, medical or dental insurance settlement information must be provided if the applicant has medical or dental insurance.

d. Documented Eligibility for Other Needs Assistance (ONA)

This Supporting Statement also includes the expansion of the acceptable documentation applicants may submit to FEMA for verification of occupancy¹ and/or ownership of their primary residence and establish eligibility for disaster assistance during the registration. Applicants (both owners and renters) must be able to prove they occupied the disaster-damaged primary residence before receiving Housing Assistance (HA) and some types of Other Needs Assistance (ONA), e.g., Personal Property Assistance, Moving and Storage Assistance, and Critical Needs Assistance.²

Occupancy-dependent eligible expenses include costs associated with: Home Repair Assistance, Home Replacement Assistance, or Permanent Housing Construction; Temporary Housing Assistance, e.g., Rental Assistance, Lodging Expense Reimbursement, or Direct Housing Assistance; Critical Needs Assistance; Personal Property Assistance (Exception: A verification of occupancy is **NOT** a requirement for stored personal property); Miscellaneous/Other Items; and Moving and Storage.

A primary residence is the home where the applicant normally lives during the majority of the calendar year (more than six months), or the home required because of proximity to employment, including agriculture activities that provide 50% of the household's income. Primary occupancy for household members may also include individuals **NOT** present at the time of the disaster, e.g., infants, spouse, or students, but who are expected

¹ NOTE: The Code of Federal Regulations (CFR) defines occupant as a resident of a housing unit.

² The following types of ONA DO NOT require verification of occupancy of the primary residence: Transportation Assistance; Funeral Assistance; Medical Assistance; Dental Assistance; and Child Care Assistance.

to return during the assistance period. If an applicant was **NOT** occupying the disaster-damaged residence at the time of the disaster, they may still be eligible if they can prove their intent to occupy the home as their primary residence. When FEMA is unable to verify an applicant's occupancy of their disaster-damaged primary residence, the applicant may provide FEMA with any of the documents outlined below for occupancy verification. Previously, occupancy documents had to be dated within three months prior to the disaster.

To provide additional flexibility to disaster survivors who may experience difficulties gathering specific documents, FEMA has expanded the types of documents we will accept from applicants to verify IHP eligibility criteria and the extended acceptable date range for documents to include pre and post disaster where appropriate. For the purpose of the following list of documents, one year prior to the disaster means within one year prior to the start of the incident period for the declared disaster. Documents provided to FEMA with a date within the registration period must show pre-disaster usage, such as a phone or utility bill, or clearly show that the applicant or co-applicant resided at the damaged dwelling at the time of the disaster.

The documentation or verification needed to verify occupancy include one of the following: Utility Bills, Other Bills, Employer's Documents, Lease/Housing Agreement, Landlord (LL) Statement, Rent Receipts, Bank Statements with image of the cancelled rent check, Public Official's Documents, Social Service Organization Documents, Federal or State Benefit Documents, Local School Documents, Motor Vehicle Registration, Driver's License, State-issued Identification (ID) card, Voter's Registration Card, Mobile Home Park Documents, and Affidavits of Residency or other Court Documents.

If the listed documentation is unavailable, FEMA may accept a written self-declaration of occupancy as a last resort from applicants whose pre-disaster residence was a mobile home or travel trailer, or from applicants living in any type of housing located in insular areas, e.g., Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, the U.S. Virgin Islands, Puerto Rico, or otherwise remote areas such as the interior of Alaska, tribal lands, and islands. Written self-declarations must include the address of the disaster-damaged residence; the length of time they lived in the disaster damaged residence prior to the Presidential disaster declaration; an explanation of the circumstances that prevent standard occupancy verification; to include why the other document types were not available to the applicant or how the available documents do not meet FEMA's requirements; an under penalty of perjury statement, and the applicant's name and signature.

Applicants must be able to prove they owned and occupied the damaged dwelling (DD), pre-disaster, as their primary residence before receiving Home Repair Assistance; Home Replacement Assistance; or Permanent Housing Construction under the Housing Assistance (HA) provision of the IHP. When FEMA is unable to verify an applicant's ownership of their primary residence, the applicant may provide FEMA with any of the documents outlined below to prove ownership. For documents provided to FEMA with a date in the registration period, the document must demonstrate the applicant owned the damaged dwelling at the time of the disaster. If the applicant is a minor child, documentation must be in the parent/guardian co-applicant's name.

Documentation or Verification Needed for ownership verification (at least one): Deed or Official Record, Mortgage Documents, Real Property (RP) Insurance document, bill, or payment record, Property Tax Receipts or Bill, Manufactured Home Certificate of Title, Real Estate Provision, Contract for Deed, Land Installment Contract, Quitclaim Deed, Bill of Sale or Bond for Title, Death Certificate accompanied by a Will; Affidavit of Heirship (only when consistent with state, territorial, or tribal government law); Receipts for Major Repairs or Improvements, Letter or Written Statement from a Mobile Home Park owner or manager, Court Documents, or a letter or other written statement from a Public Official's verifying the applicant owned the disaster-damaged residence at the time of the disaster.

Regardless of the ownership verification method (NEMIS public records verification, inspection, or submitted documents), an applicant who is responsible for maintenance and/or taxes will be considered an owner. Ownership documents must reflect: the name of the applicant or co-applicant registering for assistance. If a minor child is registering for assistance, the document must be in the adult co-applicant's name; the address of the damaged pre-disaster residence; and a date prior to the disaster incident period.

Document exceptions: if the listed documentation is unavailable, FEMA may accept a written self-declarative statement of ownership from applicants living a mobile home or travel trailer, applicants living in any type of housing located in insular areas, e.g. Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, the U.S. Virgin Islands, Puerto Rico, or otherwise remote areas such as the interior of Alaska; tribal lands, and islands, and applicants whose pre-disaster residence was passed down via heirship without formal documentation. Self-declarative statements must include the length of time the applicant lived in the disaster-damaged residence prior to the Presidential disaster declaration, an explanation of the circumstances that prevent standard ownership verification, an "under penalty of perjury" statement, and the applicant's name and signature.

Applicants who pay rent to another party to live in the home **DO NOT** qualify as owners. There may be an exception if the applicant is legally responsible for major repairs and/or taxes on the damaged residence through lease-to-own or land installment agreements. Additional exceptions may be created due to adverse possession, hereditary family lands, and cultural traditions in islands or insular areas. For Intent to Own, there may be instances when an applicant was in the process of purchasing the DD and was unable to complete the purchase before the disaster occurred. If the applicant has provided documentation showing Intent to Own within the incident period, a request for clarification of documents is submitted to IHP Program Specialists for review.

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.

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 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.

FEMA will use this information to determine eligibility for Individuals and Households assistance to accept documentation in support of proof of ownership and or occupancy of

the applicant's primary residence within OMB Collection 1660-0002 Disaster Assistance Registration in the following manner:

- a. Applicants are currently advised through correspondence (Cover Letter) what documentation is acceptable to provide the agency proof of ownership and or occupancy of their primary residence. The correspondence is delivered via the preferred correspondence method (electronic or postal mail) indicated by the applicant during the registration intake outlining the requested documentation.
- b. The applicant will also be sent a Request for Information (RFI) letter via the preferred correspondence method (electronic or postal mail) indicated by the applicant during registration intake outlining the requested documentation.
- c. This information is not shared outside the agency.

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.

The forms are available for download and use by FEMA staff via the FEMA Intranet at [https://usfema.sharepoint.com/sites/ORR/orr_programs/recovery_programs/ia_programs/Pages/IHP-Office-of-Management-and-Budget-\(OMB\)-Forms.aspx](https://usfema.sharepoint.com/sites/ORR/orr_programs/recovery_programs/ia_programs/Pages/IHP-Office-of-Management-and-Budget-(OMB)-Forms.aspx). The forms must be completed via paper because they require original signatures. The fiscal environment makes hardware acquisition and software development for in-person electronic signature difficult, therefore using downloadable online forms is an economically viable alternative. FEMA will continue to use paper forms to collect this information.

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.

This information is not collected on 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.

FEMA collaborates with the SBA in determining applicant eligibility for some types of ONA. An applicant must meet a minimum income test, established by SBA, to be considered for a loan. While FEMA will continue to refer all applicants that meet the minimum income test to SBA, FEMA is choosing to provide assistance for SBA-dependent ONA for some low-income applicants that meet the SBA's initial minimum income test prior to their loan evaluation by the SBA. These applicants will still be referred to SBA and have the ability to apply for a loan.

In specific instances IHP applicants will not be referred to SBA since verification of ownership and occupancy 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 in order to meet applicable federal program requirements. Failing to collect this information could result in improper payments to individuals ineligible for assistance.

The consequence if disability-related information is not collected is that FEMA is unable to consistently meet the needs of individuals with disabilities, which is a civil rights requirement.

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.

There is no requirement to report information 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.

There is no requirement to provide a written response in fewer than 30 days.

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

There is no requirement for respondents to submit more than an original and two copies of any document(s).

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

FEMA does not require respondents 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.

There is no statistical survey involved with this information collection.

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

There is no use of statistical data classification involved with this information collection.

- (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.**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation necessary for this information collection.

- (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.**

There is no requirement for respondents to submit proprietary trade secrets or other confidential information for 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 November 5, 2021, at 86 FR 61283. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on February 22, 2022, at 87 FR 9634. The public comment period is open until March 24, 2022.

- 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, Individual Assistance (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.

Please see the response in “8.b”.

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

FEMA does not provide any 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.

The Privacy Threshold Analysis (PTA) for the Disaster Assistance collection was approved by the DHS Privacy Office on August 12, 2021, and is valid through August 12, 2022. There are no assurances of confidentiality provided to the respondents for this information collection. A Privacy Impact Assessment (PIA) is required for this collection as a privacy-sensitive system and coverage is provided by DHS/FEMA/PIA-049 Individual Assistance Program. 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.

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 in this information collection. To the extent disability information is considered sensitive in nature, FEMA will be unable to consistently meet the needs of individuals with disabilities, if disability-related information is not collected.

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.

Review response below under “12.b.”.

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.

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.

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 500,000 RFIs will be issued, with a total annual hour burden of 83,350 hours.

The number of individuals who will be issued FEMA **Request for Information (RFI)** correspondence to obtain proof of occupancy and/or ownership is estimated at 38,646 individuals total. Each individual may submit at least one type of occupancy and/or ownership document, and it is estimated that each document requires 30 minutes (0.50 hours) to locate and submit. Of the 38,646 individuals, FEMA estimates that 23,121 individuals will submit one **ownership verification** document requiring 30 minutes (0.50 hours) to complete for a burden of 23,121 responses x 0.50 hours = 11,561 burden hours (rounded up). An estimated 15,525 individuals will submit one occupancy verification document requiring 30 minutes (0.50 hours) to complete for a burden of 15,525 responses x 0.50 hours = 7,763 burden hours (rounded up). The total annual hour burden for this documentation is 11,561 hours (ownership verification) + 7,763 hours (occupancy verification) = 19,324 burden hours.

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.

The below table shows those applicants that received an RFI letter and provided proof of occupancy and/or ownership documents.

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	Manufactured Housing Unit	9,388	1	9,388	0.2500	2,347	\$39.25	\$92,120

Households	Revocable License and Receipt for Government Property (English and Spanish) FF-104-FY-21-127 and FF-104-FY-21-127-A							
Individuals or Households	Request for Information (RFI) (COVID-19 Funeral Assistance)	500,000	1	500,000	0.1667	83,350	\$39.25	\$3,271,488
Individuals or Households	Request for Information (RFI) (Ownership Verification)	23,121	1	23,121	0.50	11,561	\$39.25	\$453,769
Individuals or Households	Request for Information (RFI) (Occupancy Verification)	15,525	1	15,525	0.50	7,763	\$39.25	\$304,698
Individuals or Households	Request for Information (RFI) (Medical, Dental, Disability-Accessibility-Related Items)	52,000	1	52,000	0.1667	8,668	\$39.25	\$340,219
Total		2,043,134		2,043,134		642,031		\$25,199,718

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. 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. Round to the nearest cent following standard rounding rules (0-4 round down and 5-9 round up).

According to the U.S. Department of Labor, Bureau of Labor Statistics³, 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

³ 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

\$39.25 per hour. Therefore, the annual burden hour cost is estimated to be \$ 25,199,718 annually (\$39.25 x 642,031 hours, + \$1 due to rounding).

The estimated annual burden hour cost to **Individuals and Households** respondents submitting ownership verification is estimated to be \$453,769.

The estimated annual burden hour cost to **Individuals and Households** respondents submitting occupancy verification is estimated to be \$304,698.

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 annual operation or maintenance costs associated with this collection.

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 annual record keeping, capital, start-up or maintenance associated with this 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 (\$)
<p>Contract Costs [350 remote local hire personnel performing Tele-Registration at \$20 per hour for 10 hours per day for 180 days] $350 \times (20 \times 10 \times 180) \times 2$ [combining both Funeral and Occupancy/Ownership costs] = \$25,200,000</p> <p>[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 = \$202,349,980</p> <p>$\\$25,200,000 + \\$202,349,980 = \\$227,549,980$</p>	\$227,549,980
<p>Staff Salaries [193 GS 9, step 5 employees¹ at \$47.34 (\$32.65 x 1.45) per hour² for 10 hours per day for 180 days] $193 \times (\\$47.34 \times 10 \times 180) = \\$16,445,916$</p> <p>Staff Salaries³ 30 Band 2 (maximum rate) Disaster Assistance Reservist employees spending approximately 100% of time annually performing site inspections and approving sites for unit installation for the data collection. [$\\$20.19/\text{hr} \times 2,080 \text{ hrs} = \\$41,995 \times 1.45 = \\$60,893 \times 30 = \\$1,826,790$]</p> <p>30 of C-Grade Level 2 Disaster Assistance Reservist employees spending approximately 100% of time annually performing site inspections and approving sites for unit installation for the data collection. [$\\$49,436 \times 1.45 = \\$71,682 \times 30 = \\$2,150,460$]</p> <p>$\\$16,445,916 + \\$1,826,790 + \\$2,150,460 = \\$20,423,166$</p>	\$20,423,166
<p>Facilities [Average of \$42 per square foot for approximately 35,000 sq ft to lease a temporary Disaster Assistance Tele-Registration Center]</p> <p>$\\$42 \times 35,000 = \\$1,470,000$</p>	\$1,470,000
<p>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 \times 2$ [combining both Funeral and Occupancy/Ownership costs] = \$2,020,200</p> <p>[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</p> <p>$\\$2,020,200 + \\$27,517,976 = \\$29,538,176$</p>	\$29,538,176
<p>Equipment Maintenance [Estimated 10% of the computer hardware and software cost]</p> <p>$\\$29,538,176 \times 0.10 = \\$2,953,818$</p>	\$2,953,818
<p>Travel [30 Disaster Assistance Reservist employees] 30 airline tickets x \$900 round trip x 6 trips = \$162,000; car rentals at \$1,000 per month x 30 x 6 trips = \$180,000; hotels 30 x 30 nights x 6 trips x \$150 per night = \$810,000</p> <p>$\\$162,000 + \\$180,000 + \\$810,000 = \\$1,152,000$</p>	\$1,217,000

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 x \$6,500 = \$65,000 \$1,152,000 + \$65,000 = \$1,217,000	
Printing [\$15 to print 500 copies of FF 009-0-1 and 009-0-2 to send to 14 Disaster Recovery Centers in the event Internet and Tele-Registration are inaccessible.] \$15 x 14 = \$210	\$210
Postage [Cost to mail 938,800 copies of FF 009-0-1 to individuals at \$0.55 per mailing based on annual registration projects.] 938,800 x \$0.55 = \$516,340	\$516,340
Other [Cost of security badges for 350 local hire personnel at \$93.39 per security profile setup and badge creation.] 350 x \$93.39 = \$32,687	\$32,687
Total	\$283,701,377
<p>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 September 9, 2021.</p> <p>² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.</p> <p>³ 2021 Stafford Act Pay Band. Band 2 minimum PH rate: \$22.08, maximum: \$41.62. Average: \$31.85 (((\$22.08 + \$41.62) ÷ 2).</p>	

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
Request for Information (RFI) (Ownership Verification)	0	11,561	11,561	0	0	0
Request for Information (RFI) (Occupancy Verification)	0	7,763	7,763	0	0	0
Request for Information (RFI) (COVID-19 Funeral Assistance)	0	0	0	92,018	83,350	-8,668
Request for Information (RFI) (Medical, Dental, Disability-Accessibility-Related Items)	0	8,668	8,668	0	8,668	8,668
Total	0	27,992	27,992	92,018	92,018	0

Explain: There is an additional 27,992 increase in burden hours due contract costs associated with the verification of additional documentation.

On January 20, 2021, President Biden issued Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, designed to pursue a comprehensive approach to advancing equity for all, including people of color, people with disabilities, rural communities, and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Pursuant to this Executive Order and other related presidential memoranda, FEMA filed an RFI with the *Federal Register* (86 FR 21325), requesting information from the public on the extent to which existing agency programs, regulations, and policies perpetuate systematic barriers to opportunities and benefits for historically underserved groups; bolster resilience to the impacts of climate change; and address the disproportionately high and adverse climate-related impacts on disadvantaged communities.⁴

A primary goal of the RFI was to seek comments on potential improvements in terms of the directives and principles of Executive Order 13985 and Executive Order 13563, *Improving Regulation and Regulatory Review*, which refers explicitly to equity,

⁴ <https://www.govinfo.gov/content/pkg/FR-2021-04-22/pdf/2021-08444.pdf>.

distributive impacts, and human dignity, all of which can be compromised by excessive and inflexible administrative burdens and paperwork requirements.

FEMA recognizes the need to expand its outreach to underserved populations consistent with that finding and its Pub 1 Core Values of Compassion, Fairness, Integrity, and Respect. These values are a reminder that FEMA aspires and intends to serve all people equitably, regardless of race, color, religion, national origin, sex (including pregnancy, gender identity, and sexual orientation), disability, age, or genetic information. On all of these counts, FEMA seeks to do better by reducing unnecessary administrative burdens and excessive paperwork requirements, and by increasing flexibilities. On the basis of an initial summary review of the feedback received via the RFI and an internal analysis of our statutory and regulatory authorities and current policy and program guidance, FEMA noted areas where additional flexibilities could be provided to ensure access to assistance is equitably provided to all applicants.

FEMA is expanding the types and acceptable dates of documents that may be submitted to verify occupancy. Previously, occupancy documents had to be dated within three months prior to the disaster. To provide additional flexibility and fairness to disaster survivors who experience difficulty in gathering specific documents, FEMA expanded the acceptable date range for documents to extend both pre- and post-disaster. In the charts to follow, one year prior to the disaster means within one year prior to the start of the incident period for the declared disaster. Acceptable documents dated within the 18-month period of assistance must show pre-disaster usage or explicitly state that the applicant or co-applicant resided at the damaged dwelling at the time of the disaster.

There is 19,324 (71,324 – 52,000) increase in burden hours from adding this additional verification documentation. The table indicating annual burden hours and costs was revised to differentiate between the various types of RFI letters. Previously, the RFIs were all combined to show an aggregate total for COVID-19 Funeral Assistance, Medical, Dental, and Disability Accessibility-related item RFIs. The revised table above separates the Medical, Dental and Disability Accessibility-related item RFIs from the COVID-19 Funeral Assistance RFIs.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (costs currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (costs currently on OMB Inventory)	Adjustment (New)	Difference
Request for Information (RFI) (Ownership Verification)	\$0	\$453,769	\$453,769	\$0	\$0	\$0
Request for Information (RFI) (Occupancy Verification)	\$0	\$304,698	\$304,698	\$0	\$0	\$0
Request for Information (RFI) (COVID-19 Funeral Assistance)	\$0	\$0	\$0	\$3,611,707	\$3,271,488	-\$340,219
Request for Information (RFI) (Medical, Dental, Disability-Accessibility-Related Items)	\$0	\$340,219	\$340,219	\$0	\$340,219	\$340,219
Total	\$0	\$1,098,686	\$1,098,686	\$3,611,707	\$3,611,707	\$0

Explain: There is a \$1,098,686 increase in burden costs from adding these additional verification documentations.

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”. This collection does not use efficient statistical survey methodology or use of information technology. Statistical Survey methodology “is not applicable.”