

April 4, 2022

Supporting Statement (Part B)

OMB Control Number: 1660 – NW133

Title: Generic Clearance for Civil Rights and Equity

B. STATISTICAL METHODS

Data collection methods and procedures will vary; however, the primary purpose of these collections will be for internal management purposes. There are no plans to publish or otherwise release this information.

1. Universe and Respondent Selection

The activities under this clearance may involve samples of self-selected customers, as well as convenience samples and quota samples, with respondents selected either to cover a broad range of customers or to include specific characteristics related to certain products or services.

Results will not be used to make statements representative of the universe of study, to produce statistical descriptions (careful, repeatable measurements), or to generalize the data beyond the scope of the sample. The specific sample planned for each individual collection and the method for soliciting participation will be described fully in each collection request.

Qualitative surveys are tools used by program managers to change or improve programs, products, or services. The accuracy, reliability, and applicability of the results of these surveys are adequate for their purpose.

The samples associated with this collection are not subjected to the same scrutiny as scientifically drawn samples where estimates are published or otherwise released to the public as they are not meant to be interpreted similarly.

2. Procedures for Collecting Information

Data collection methods and procedures will vary and the specifics of these will be provided with each collection request. The Agency expects to use a variety of methodologies for these collections. For example, the Agency or its contractors may use commercial survey-specific software to automate its collection and analysis of feedback. In addition to physical copies, information collection instruments may be electronically disseminated and/or posted on target pages of the Agency's web site. Telephone scripts, personal interviews, and focus groups with professional guidance and moderation may also be used.

3. Methods to Maximize Response

Information collected under this generic clearance will not yield generalizable findings on a national level. Statistical methods to appropriately stratify results based on disaster, location, and demographics will be used. Each information collection will describe methods to maximize response.

4. Testing of Procedures

Pretesting may be done with internal staff, a limited number of external colleagues, and/or customers who are familiar with the programs and products. If the number of pretest respondents exceeds nine members of the public, the Agency will submit the pretest instruments for review under this generic clearance.

5. Contacts for Statistical Aspects and Data Collection

Each program will obtain information from statisticians/analysts in the development, design, conduct, collection and analysis of data, and customer service surveys, when appropriate. This statistical expertise will be available from agency statisticians/analysts or from contractors and the Agency will include the names and contact information of persons consulted in the specific information collection requests submitted under this generic clearance.

Demographic data will be used to conduct robust statistical analysis of demographics compared to program outcomes to provide FEMA Recovery Leadership with insight about any potential disparities in disaster assistance delivery. We will use inferential and descriptive statistics to:

- Test the collinearity and intersectionality of demographic variables for assistance with future planning.
- Make predictions about applicant behavior in order to provide predictive modeling and analytics for future disasters.
- Compare demographic data to registration damage self-assessment questions to determine if there are correlations between demographics and the self-assessment during the registration process, or the accuracy of the self-assessment compared to FEMA inspector damage determinations.
- Use parametric and non-parametric techniques to compare IHP outcomes to demographics to determine differences in:
 - Program referral rates
 - Insured rates
 - Eligibility rates
 - Eligibility amounts
 - Assistance denial reasons

- Determine if any disparities in program outcomes can be attributed to specific policies, procedures, guidelines, or employee/contractor behavior.
- Assess the impact by conducting significance testing of proposed policy, regulatory, law, and procedure changes on small, vulnerable populations that would be missed by aggregated or other non-individualized demographic data.

FEMA analysts and statisticians understand limitations in data collection, stratification of data, and will ensure that data is not generalized or extrapolated in ways that is not appropriate for our disaster populations and analysis conducted.