## **Supporting Statement for Paperwork Reduction Act Submissions**

OMB Control Number: 1660 - NW144

Title: Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey

Form Number(s): FEMA Form FF-008-FY-22-128, Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey

### **General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### **Specific Instructions**

### A. Justification

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

The legal basis for the collection of the following information includes Titles 6 and 42 of the United States Code. The sections in Title 6 include 313, 314, and 317, which provides legal authority and responsibilities to the Federal Emergency Management Agency (FEMA) and to its respective regional offices to work with state, local, territorial and Tribal (SLTT) governments and private non-profits (PNP) with disaster preparedness. The sections in Title 42 include 5131(a), 5131(b), 5195, 5196(e), and 5196(f). The identified sub sections of 5131 provide legal authority to FEMA Federal and state disaster preparedness programs via utilization of services of other agencies and technical assistance. Section 5195 states that a purpose of 42 U.S.C. §§ 5195 et seq. is to vest responsibility for emergency preparedness in the Federal Government. Section 5195a provides definitions for relevant terms. Section 5196(e) authorizes FEMA to develop emergency preparedness measures designed to afford adequate protection of life and property, and section 5916(f) authorizes FEMA to conduct or arrange for training programs for the instruction of emergency preparedness officials and other persons in the organization, operation, and techniques of emergency preparedness. All these legal authorities affirm the authority of FEMA Region II to collect this information and the critical need to do so.

Additionally, the Presidential Policy Directive (PPD-8) - National Preparedness, directed the development of the National Preparedness Goal that identifies core capabilities necessary for preparedness and a National Preparedness System to guide activities to reach the Goal. The proposed collection works to improve tracking of core capabilities across FEMA Region II to most efficiently use resources to meet the National Preparedness Goal.

More specific to the program area, FEMA Region II's National Preparedness Division (NPD) is responsible for educating and securing the nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk. One of the ways FEMA accomplishes this is through conducting exercises, trainings, and webinars where stakeholders like SLTT governments and PNP entities participate.

The delivery methodology of these programs to a variety of stakeholders are always evolving and continuously improving to meet stakeholder's needs. Likewise, as internal agency policy changes, so can delivery methods. Specifically for FEMA, this includes release of the 2022- 2026 FEMA Strategic Plan. Strategic Goal #3 includes Promote and Sustain a Ready FEMA and Prepared Nation, and the objectives 3.1 - Strengthen the Emergency Management Workforce and 3.2 – Posture FEMA to Meet Current and Emergency Threats. This strategic goal and its associated objectives are well aligned to priorities of FEMA Region II's National Preparedness Division, with internal goals of data-driven capacity building and a more equitable approach to program delivery.

By better gauging stakeholder capacity and needs at an organizational level we can better provide programs and services to our stakeholders to ultimately improve preparedness in FEMA Region II.

More on the strategic plan can be found here: <a href="https://www.fema.gov/about/strategic-plan">https://www.fema.gov/about/strategic-plan</a>.

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.

Region II's NPD is currently working to get approval for more robust methods to evaluate needs and capabilities of stakeholders in the region via various surveys. These surveys will allow for better targeting of trainings, exercises, and webinars by location, time frame, and topic area.

Survey data will be analyzed and access to underlying data will be limited to an as needed basis to colleagues in Region II's NPD. Analyses will be shared via presentations at an aggregated level to inform operations. As an example, the training program could better understand topic areas of interest and offer deliveries of those trainings later.

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.

Surveys will be populated and conducted via SurveyMonkey, one of the few survey software's that are compliant via Department of Homeland Security's Mobius system. The use of SurveyMonkey will allow for easy dissemination of the survey by using a single link for respondents. SurveyMonkey also allows for branching logic in the survey that will reduce the amount of time respondents will have to spend on reading instructions if they need to skip questions. These benefits are also in addition to a user-friendly interface. SurveyMonkey is a familiar surveying method which will ease the potential burden for respondents to navigate the survey.

Usability Testing has been conducted on this new collection. The testing included multiple users providing estimates of timing for the surveys and areas of improvement for

survey logic and flow. Suggestions offered included carry forward functions in SurveyMonkey (i.e., a response in one multiple-answer question will ensure they only are asked follow-up information on that answer), clarifying language on certain questions, and improving skip logic to ensure respondents aren't answering the same questions twice. All these measures improved the user experience, and training staff in FEMA Region 2 noted a logical and accessible survey for them to use in their operations. Estimates of time needed for the surveys have shifted as the Training and Exercise Survey was removed from the question bank and approved under a different avenue, but the timing appears to align with the estimates provided previously of 0.25 hours per submission.

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

The source of the questions for the Needs and Capability Assessment is from the FEMA document *Engaging Faith-based and Community Organizations: Planning Considerations for Emergency Managers*. After extensive searching within the Agency for Privacy Threshold Analyses (PTA's) and Office of Management and Budget approval for the question bank, no approval for survey delivery was identified.

Attempts to identify potential duplication and alternatives in questions was conducted via corresponding with the Individual and Community Preparedness Program at FEMA HQ, the National Training and Exercise Division, and the Information Management Division under the Office of the Chief Administrative Officer at FEMA. No options were available.

## 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.

The removal of the training and exercise survey portion of the question bank that was approved through a different avenue works to minimize the burden to small entities by excluding a potentially irrelevant series of questions to small entities. As a result, the collection of information does not significantly impact small business or other small entities.

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.

If the collection of information is not conducted, Region II's NPD will continue to lack effective and data-driven means to evaluate the impacts of programs and methods to equitably target programs. Given the current priorities from FEMA's Strategic Plan on equity and a ready FEMA and prepared nation, the inability to collect information on our stakeholders would lead us to fall short in our mission and priority areas.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner (*See* 5 CFR 1320.5(d)(2)):
  - a. Requiring respondents to report information to the agency more often than quarterly.

This information collection does not require respondents to report information more than quarterly.

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

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

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

This information collection does not require respondents to submit more than an original and two copies of any document.

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

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years.

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

This information collection does not include a 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 a statistical data classification that has not been reviewed and approved by OMB.

g. That includes a pledge of confidentiality that is not supported by authority established in statue 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 information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

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 information collection does not require respondents to submit trade secrets or other 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 January 3, 2023, at 88 FR 87. One comment suggesting multiple detailed edits was received.

#### Comment 1 (FEMA-2022-0038-0002 & FEMA Response to Comment 1:

A. Note the date of the FEMA publication cited: the **2018** FEMA text, *Engaging Community and Faith-based Organizations*.

FEMA Response: Confirmed, we will add this into the notice.

B. On p. A-1 add Name of Contact in addition to name of organization

*FEMA Response:* Due to privacy concerns we are unable to ask directly for the direct contact of the person filling out the form. The only way to get the Privacy Threshold Analysis approved was to collect information at the organizational level.

C. In addition to asking the organizations Web site/URL, would also suggest asking for social media if applicable (e.g., Twitter username/handle, Facebook).

*FEMA Response:* Although this could be interesting, the potential benefit to this data collection is unclear and not aligned with the priorities of FEMA Region 2's engagement efforts.

D. On page A-2, in addition to the services noted would add under "What services/resources do you provide on a daily basis to your members or community?" in addition to those services cited the following: legal services, case management, financial management (e.g., tax assistance); employment; education and training.

*FEMA Response:* Case management is a good addition, and will be added in, as will education and training. The others go outside the scope into other wraparound services and economic concerns rather than just emergency management.

E. Also some of these categories seem unclear and/or redundant (ex. shelter vs. shelter management; food/commodities pantry vs. commercial kitchen). Not all respondents may understand the distinctions.

*FEMA Response:* Removing "Shelter Management" and keeping "Shelter". Food/commodities pantry implies a degree of informality and lower capacity to prepare and store food compared to a commercial kitchen that can feed many more people. We'll keep both responses in but will look at the data for this one closely.

F. On p. A-3, in addition to "Would your organization be willing to provide these services in an emergency" would ask also about their capability of providing services. And maybe add a question "Has your organization provided these services in a disaster or emergency? If so, describe."

*FEMA Response:* We appreciate the helpful feedback, and will add this question in.

G. On p. A-3 would suggest expanding beyond crisis counselors and also asking about mental health, substance use disorder and similar services.

*FEMA Response:* We appreciate the feedback but feel that crisis counselor in the context of a disaster setting seems a sufficient catch-all term for those services.

H. Rather than asking about "Retired Public Safety Personnel" would ask about Public Safety/Security personnel.

*FEMA Response:* We appreciate the helpful feedback, and will add this response in.

I. On p. A-3 for the question "Does your organization have a shelter space available for use during a small or large-scale incident?" would also ask about whether the shelter has private rooms or the ability to subdivide a larger space. Would use the word(s) emergency or disaster rather than 'incident' which is vague.

*FEMA Response:* Though this could be helpful, this seems especially granular information that would necessitate more engagement on the capacity of the shelter than a survey.

J. For the question on p. A-4 "Can your organization provide mental, emotional counseling during a small or large-scale incident?" would suggest asking about behavioral health services generally (e.g., mental health and substance use disorders). Personnel could include social workers, marriage and family therapists, psychologists, psychiatric nurses and others so would not limit this just to counselors in the follow-up question.

*FEMA Response:* This is helpful feedback, but we ask about the types of counseling they offer specifically, so we'll leave this question as is. The other types of personnel mentioned feel out of scope for the disaster setting in most scenarios.

K. On p. A-4 in addition to asking organizations about shelter space, would suggest asking them about the ability to provide other resources. For instance, an organization that accepts furniture or car donations might have tow trucks, vans or commercial vehicles available for routine and emergency use. Other organizations may have

passenger buses and vans they use for transportation. Could ask about accessibility of these vehicles as well (e.g., do they have a lift/ramp).

*FEMA Response:* This could be helpful, but these questions are very granular, and we want to be careful about adding in too many questions into this survey. Moreover, we already ask about services/resources they offer daily to their community, including transportation.

L. In the B pages, I am unclear on what is meant by "Access to and Trust of Underserved Communities" under the personnel survey.

*FEMA Response:* We interpret this as something like a community-based organization that works specifically with certain groups. It might be a faith-based organization that has clients who speak English as a second language. It would be helpful to have a trusted messengers to help us connect with survivors and/or community members before disasters.

A 30-day Federal Register Notice inviting public comments was published on May 1, 2023, at 88 FR 26586. The public comment period is open until May 31, 2023.

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.

Not applicable.

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.

Not applicable.

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

Not appliable.

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

A Privacy Threshold Analysis (PTA) was approved by the Department of Homeland Security (DHS) on August 3, 2022.

Privacy Impact Assessment (PIA) coverage is provided by DHS/ALL/PIA-069, DHS Surveys, Interviews and Focus Groups.

System of Records Notice (SORN) coverage is provided by DHS/ALL-002 Department of Homeland Security (DHS) Mailing and Other Lists system (November 25, 2008, 73 FR 71659); and DHS/ALL-004 General Information Technology Access Account Records Systems (GITAARS) (November 27, 2012, 77 FR 70792).

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

There are no questions of a sensitive nature.

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

**FEMA Form FF-008-FY-22-128, Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey:** is estimated to have 1,719 SLTT emergency management officials (respondents) times 1 response per year for 1,719 total

annual responses (1,719 x 1 = 1,719). It is estimated that each response will require 0.25 burden hours to complete, therefore 1,719 responses times 0.25 hours equals 430 total annual burden hours (1,719 x 0.25 = 430).

We also estimate to have 143 PNP respondents times 1 response(s) per year for 143 total annual responses (143 x 1 = 143). It is estimated that each response will require 0.25 burden hours to complete, therefore 143 responses times 0.25 hours equals 36 total annual burden hours (143 x 0.25 = 36).

Estimates of time needed for the surveys has shifted as the Training and Exercise Survey was removed from the question bank and approved under a different avenue. As of now, the timing appears to align with the usability testing estimates provided of 0.25 hours per submission.

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.

Please see our response to 12a above and 12c below.

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 1.4 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 Responde nt Cost
State, Local, Tribal & Territorial (Gov. Emergency Mgt officials)	Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey / FEMA Form FF- 008-FY-22-128	1,719	1	1,719	0.25	430	\$40.61	\$17,462
Private Sector (Non- profits)	Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey / FEMA Form FF- 008-FY-22-128	143	1	143	0.25	36	\$45.10	\$1,624
Total	1 . 2 1 1 1 1 1	1,862		1,862		466		\$19,086

<sup>&</sup>quot;Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I

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

According to the U.S. Department of Labor, Bureau of Labor Statistics<sup>2</sup>, the March 2021 Occupational Employment and Wage Estimates wage rate for All Occupations (SCO 00-0000) is \$28.01 an hour. Including the wage rate multiplier of 1.45 for PNP respondents and wage rate multiplier of 1.61 for SLTT respondents, the fully-loaded wage rate for PNPs is \$40.61 per hour and SLTT fully loaded wage rate is 45.10 per hour. Therefore, the annual burden hour cost is estimated to be \$19,086 ((\$40.61 x 430 hours) + (45.10 x 36 hours)).

### 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing

<sup>&</sup>lt;sup>1</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at <a href="https://www.bls.gov/news.release/archives/ecec">https://www.bls.gov/news.release/archives/ecec</a> 03182022.pdf. Accessed March 29, 2022. The wage multiplier is calculated by dividing total compensation for all workers of \$40.35 by wages and salaries for all workers of \$27.83 per hour yielding a benefits multiplier of approximately 1.45. For State and local government wage multiplier: Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at <a href="https://www.bls.gov/news.release/archives/ecec">https://www.bls.gov/news.release/archives/ecec</a> 03182022.pdf. Accessed March 29, 2022. The wage multiplier is calculated by dividing total compensation for State and local government workers of \$54.96 by Wages and salaries for State and local government workers of \$34.09 per hour yielding a benefits multiplier of approximately 1.61

<sup>&</sup>lt;sup>2</sup> Information on the mean wage rate from the U.S. Department of Labor Bureau of Labor Statistics is available online at: : <a href="https://www.bls.gov/oes/2021/may/oes">https://www.bls.gov/oes/2021/may/oes</a> nat.htm

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.)

Annual Cost Burden to Respondents or Recordkeepers							
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents			
Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey / FEMA Form FF-008- FY-22-128	\$0	\$0	\$0	\$0			
Total	\$0	\$0	\$0	\$0			

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 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 capital or start-up costs 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 (\$)				
Contract Costs [Describe]	\$0				
Staff Salaries <sup>1</sup> 1 GS 12 Step 5 employees spending approximately 6.2% (128 hours divided by 2,080 working hours for the year) of time					
Excluding the time to go through the PTA/PRA. The annual estimate of time would be 3-4 surveys deployed per year with 8 hours to prepare a survey, 16 hours to analyze and clean the data, 8 hours to develop a brief project. 32 hours per survey multiplied by up to 4 surveys is 128 hours.	\$9,494				
The base rate for GS-12 at step 5 is $$51.15 \times 1.45 = $74.17$ an hour times 128 hours is a total estimate is $$9,494$					
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0				
Computer Hardware and Software [cost of equipment annual lifecycle]	\$384				
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0				
Travel	\$0				
Total	\$9,878				

<sup>&</sup>lt;sup>1</sup> Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB\_h.pdf">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB\_h.pdf</a> Accessed March 21, 2023

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).

An "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.

<sup>&</sup>lt;sup>2</sup> Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.

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	
Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey (SLTT) / FEMA Form FF-008-FY- 22-128	0	430	+430				
Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey (PNP) / FEMA Form FF-008-FY- 22-128	0	143	+143				
Total	0	466	+466	0	0	0	

*Explain:* 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
Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey (SLTT) / FEMA Form FF-008-FY- 22-128	\$0	\$17,462	+\$17,462677			
Region II Community and Faith-Based Organizations Needs/Capabilities Feedback Survey (PNP) / FEMA Form FF-008-FY- 22-128	\$0	\$1,624	+\$1,624			
Total	\$0	\$19,086	+\$19,086	\$0	\$0	\$0

**Explain:** 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.

Not applicable.

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".