Office of Human Services Emergency Preparedness and Response Disaster Human Services Case Management Intake Assessment, Resource Referral, and Case Management Plan

> OMB Information Collection Request 0970 - NEW

Supporting Statement Part A - Justification

Type of Request: Emergency

October 2023

Submitted By: Office of Human Services Emergency Preparedness and Response Administration for Children and Families U.S. Department of Health and Human Services

Summary

The Administration for Children and Families (ACF) is requesting emergency review and approval of this information collection by OMB, as authorized under <u>44 U.S.C. 3507</u> (subsection j). The proposed forms are necessary to enable ACF's Office of Human Services Emergency Preparedness and Response (OHSEPR) to provide case management support to residents of the state of Hawai'i that were impacted by wildfires beginning August 8, 2023. The wildfires have destroyed more than 3,000 homes and impacted nearly 9,000 residents in Maui County. The information collection is essential to the mission of the agency and is necessary to support vulnerable families. Emergency review and approval is necessary to prevent public harm that is reasonably likely to result if normal clearance procedures are followed as it would result in the initiation of disaster human services case management operations to support families that are currently displaced.

1. Circumstances Making the Collection of Information Necessary

The Disaster Human Services Case Management (DHSCM) program is authorized through appropriations language under the Children and Families Services account. It is operated by OHSEPR, which is the lead in HHS for human service preparation for, response to, and recovery from, natural disasters. The wildfires that began August 8, 2023, have displaced thousands of residents. The state and county do not have existing internal capability to conduct disaster case management operations to support residents.

OHSEPR's previous OMB-approved collection for disaster case management operations was limited to FEMA's Immediate Disaster Case Management program and the collection expired July 31, 2023. Absent approval of the new collection, OHSEPR and ACF would not be able to provide disaster human services case management services to disaster survivors in Hawai'i and other impacted jurisdictions.

2. Purpose and Use of the Information Collection

OHSEPR will use this information collection to conduct intake assessments of disaster survivors to identify their unmet needs and provide case management services to connect these survivors to human services programs and other referrals that can support their needs.

3. Use of Improved Information Technology and Burden Reduction

This collection will primarily be completed using the Office of Human Services Emergency Preparedness and Response's Electronic Case Management Records System, which is a FISMA and FedRAMPed cloud-based system hosted in an Amazon Web Service environment. The collection may be completed manually during response operations in jurisdictions with limited internet connectivity.

4. Efforts to Identify Duplication and Use of Similar Information

Duplication of efforts will be addressed through the collection's questions that determine if a disaster survivor is receiving benefits from another human services program or another federal disaster assistance program for their identified needs. Case managers will coordinate with other agencies, as applicable.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

If information was not collected or collected less frequently, disaster survivors will experience disruptions in services as they transition from federally-administered disaster case management operations to state-administered disaster case management operations.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances for this information collection.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF is in the process of publishing a notice in the Federal Register announcing the agency's intention to request an expedited OMB review of this information collection activity. This notice alerts the public of a request for emergency approval for six months of data collection and provides a sixty-day comment period related to the full request that will be submitted to continue data collection beyond six months. A full request will document any comments received and how ACF has considered the comments.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The collection's Privacy Statement advises respondents that they are authorizing ACF to share their information with ACF's service providers who can support their self-reported needs. The use and protection of these records are discussed in OHSEPR's System of Records Notice, for OHESPR Repatriation and Disaster Human Services Case Management Records, 09-80-0389. Respondent information will be kept private and only shared with service providers, as appropriate and needed.

11. Justification for Sensitive Questions

Intimate partner violence, human trafficking, and child and elder neglect and abuse often increase in communities impacted by a disaster. This collection includes sensitive questions to enable case managers to take actions to prevent and mitigate these risks.

12. Estimates of Annualized Burden Hours and Costs

OHSEPR's case managers help disaster survivors complete the collection. The number of disasters that would warrant data collection is estimated at three per year. Due to the unpredictable nature of disasters, the number of respondents is estimated at approximately 9,000. For example, there were 2,200 intake assessments completed in 2011 following Hurricane Irene and Tropical Storm Lee. There were 4,100 intake assessments completed following Super Storm Sandy in 2012. Participation in information collection is voluntary and based on acceptance of case management services. The cost to survivors is calculated based on the estimated time to complete the intake assessment multiplied by the federal minimum wage of \$7.25. The average hourly rate for case managers is \$35.00. To account for fringe benefits and overhead, the hourly rate (\$35.00) is multiplied by two, which is \$70.00.

Information Collection Title	Annual Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Disaster Human Services Case Management Intake Assessment – Survivor	9,000	1	1.5	13,500	\$7.25	\$97,875
Case Management Plan – Case Manager	180	50	1	9,000	\$70.00	\$630,000
Resource Referral Form – Case Manager	180	50	1	9,000	\$70.00	\$630,000
Case Record Notes – Case Manager	180	50	1	9,000	\$70.00	\$630,000
Survivor Satisfaction Survey – Survivor	9,000	1	.25	2,250	\$7.25	\$16,312
			Totals:	42,750		\$2,004,187

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs to respondents.

14. Annualized Cost to the Federal Government

Case managers are under contract to the federal government. Based on the average hourly wage and including benefits and overhead, the annualized cost to the federal government is \$1,890,000.

15. Explanation for Program Changes or Adjustments

This is a new information collection.

- **16. Plans for Tabulation and Publication and Project Time Schedule** The results of the information collection will not be published.
- **17. Reason(s) Display of OMB Expiration Date is Inappropriate** There are no reasons not to display the expiration date.
- **18. Exceptions to Certification for Paperwork Reduction Act Submissions** No exceptions are necessary for this information collection.