

Generic Clearance for Disaster Information Collection Form

**OMB Information Collection Request
0970 - 0476**

Supporting Statement Part A - Justification

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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) requests an extension of the generic Disaster Information Collection Form. Under this generic clearance, ACF currently has five Disaster Information Collection Forms tailored for each of the five following ACF offices or programs: the Children's Bureau, the Family Violence Prevention and Services Program, the Office of Child Care, the Office of Head Start, and the Runaway and Homeless Youth (RHY) Program. This request is to continue use of those forms and extend approval of the overarching generic to allow for potential new submissions over the next three years. There are no changes to the overarching generic or the forms approved under this generic.

1. Circumstances Making the Collection of Information Necessary

ACF oversees more than 60 programs that affect the normal day to day life of families, children, individuals, and communities in the United States. Disasters destroy homes; damage local infrastructure, and disrupt children, individuals, and family's life. Disasters interrupt the delivery of services and social support networks, thus negatively affecting community well-being.

ACF/Office of Human Services Emergency Preparedness and Response (OHSEPR) is required under Presidential Policy Directive (PPD)-8¹, the National Response Framework², and the National Disaster Recovery Framework³ to report the impacts of disasters on ACF-supported human services programs to the Health and Human Services (HHS) Secretary's Operation Center (SOC) and interagency partners. ACF/OHSEPR works in partnership with the HHS Assistant Secretary for Preparedness and Response (ASPR), and the Federal Emergency Management Agency (FEMA) to report assessments of disaster impacted ACF programs and the status of continuity of services and recovery.

PPD-8 provides federal guidance and planning procedures under established phases – protection, preparedness, response, recovery, and mitigation. The forms approved under this generic mechanism – Disaster Information Collection Forms – are used by ACF/OHSEPR before, during, and after a disaster, both natural (e.g., tornado, earthquake, hurricane) and man-made (e.g., chemical spill, water contamination) disasters.

The Disaster Information Collection Forms provide an assessment of the condition of ACF programs in the response and recovery phases of a disaster. Information collected through

¹ U.S. Department of Homeland Security. Presidential Policy Directive / PPD-8: National Preparedness. DHS; c2011 [cited 2016 February 23]. Available from: <https://www.dhs.gov/presidential-policy-directive-8-national-preparedness>

² U.S. Department of Homeland Security. National Response Framework. DHS; c2015 [cited 2019 April 01]. Available from: <http://www.fema.gov/national-response-framework>

³ U.S. Department of Homeland Security. National Disaster Recovery Framework. DHS; c2015 [cited 2019 April 01]. Available from: <http://www.fema.gov/national-disaster-recovery-framework>.

these forms is imperative for ACF/OHSEPR to facilitate support and technical assistance from ACF to the programs that are impacted by the storm.

Combinations of the following laws enable ACF to utilize the Disaster Information Collection Forms:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288)⁴ to fulfill disaster response and recovery efforts as mission assigned by FEMA.
- Pandemic and All-Hazards Preparedness Reauthorization Act⁵ (Public Law 113-5) to coordinate with the HHS ASPR in order for HHS leadership to make decisions in response and recovery for impacted families.

2. Purpose and Use of the Information Collection

The recovery phase of a disaster involves moving the community back toward normal functioning. Recovery is immediate and overlaps with response. It includes actions such as providing essential public health and human services operations.⁶

The assessment information collected in the Disaster Information Collection Forms is used to provide near-real time updates during the response and recovery phases of a disaster. The information is collected on the programs that fall within the disaster-affected and neighboring areas.

OHSEPR reaches out to ACF program offices to determine any impacts on the normal operations of program services. Impact information is collected through the Disaster Information Collection Forms by the ACF program offices through requests to grantees and state administrators. The information is forwarded to ACF/OHSEPR for analysis and assessment of interruption to ACF services as a result of the disaster.

OHSEPR provides back to the ACF program offices its analysis of the collected data which helps the ACF programs to provide technical assistance and impact-specific subject matter expertise to the impacted grantees and state offices. The information gathered in these data collection forms is also used to assess the response and recovery gaps of ACF programs 30 days to one (1) year post disaster.

⁴ U.S. Department of Homeland Security. Robert T. Stafford Act Disaster Relief and Emergency Assistance Act. DHS c2013. [Cited 2016 February 23]. Available from: <https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-act-public-law-93-288-amended>

⁵ U.S. Department of Health and Human Services. Pandemic and All-Hazards Preparedness Reauthorization Act. DHHS c2016. [Cited 2016 February 23]. Available from: <http://www.phe.gov/Preparedness/legal/pahpa/Pages/pahpra.aspx>

⁶ U.S. Department of Homeland Security. National Response Framework. DHS; c2013 [cited 2019 April 01]. Available from: <http://www.fema.gov/national-response-framework>

The assessment that is received from the ACF programs (discretionary and mandatory), grantees, and/or state administrators is reported to the ACF Assistant Secretary and leadership. The Disaster Information Collection Form assessment also serves as a reporting requirement for ACF/OHSEPR. The analysis is shared, as appropriate, with the White House via the FEMA-produced Senior Leadership Brief.

3. Use of Improved Information Technology and Burden Reduction

The Disaster Information Collection Form is delivered to grantees/administrators respondents via email. Respondents return the form via email. If the impacted respondents are unable to access a computer due to damages from a disaster, ACF Program staff work with the grantees/administrators to enter the data into the form.

4. Efforts to Identify Duplication and Use of Similar Information

OHSEPR works closely with HHS ASPR and FEMA. The federal role of human services disaster work falls within ACF; it is the responsibility of ACF to lead the federal charge of disaster human services. There is no similar information available. The Disaster Information Collection Form is the only process available to collect information on the interruption of services to the families served by ACF programs.

5. Impact on Small Businesses or Other Small Entities

Not applicable. Small businesses and small entities are not impacted.

6. Consequences of Collecting the Information Less Frequently

Real-time impact information on the disaster is vital for recovery, and future planning efforts for ACF programs. The information is collected only in direct response to a natural or manmade disaster.

It is imperative that ACF collects specific information regarding the impacts of ACF programs immediately after an event to ensure that ACF is providing a strategic and timely response to meet the needs of individuals, children, families, local grantees, implementing agencies, and the surrounding communities.

If this information is not collected it will hamper ACF/OHSEPR's ability to provide strategic information to the ACF program offices which, in turn, hampers the program office's ability to best serve their grantees. State administrators and grantees depend on immediate federal guidance and technical assistance to respond to and recover from disasters.

Obstacles to collecting the data are unique to the disaster and are overcome through OHSEPR's use of various outreach methods to relieve the burden on those from whom information is requested.

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

The information requested is needed immediately following a disaster and will ensure that emergency responders have a mechanism in place to guide their strategic response and recovery efforts.

The collection of information falls within the 30-day response timeframe. The information gathered through the data collection form is used to support a coordinated response during the initial outreach stage of the disaster when emergency response personnel and federal government resources may be conducting damage assessments to aid recovery efforts in the impacted disaster zones.

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 published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on March 17, 2022, Volume 87, Number 52, page 15253, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

Over the past few years of using the data collection form ACF program offices have received feedback from grantees and state administrators regarding the ease of gathering information for the form; the use of the information; the length of the form; and the benefit of receiving technical assistance directly related to issues identified through the form. Modifications to the form have not been necessary.

In mid-2021 ACF/OHSEPR launched consultations with the ACF program offices that use the forms to collect disaster data. These discussions will continue in 2022 and will morph into consultation with the grantees and state administrators who complete the forms.

9. Explanation of Any Payment or Gift to Respondents

Not applicable

10. Assurance of Confidentiality Provided to Respondents

Not applicable

11. Justification for Sensitive Questions

Not applicable

12. Estimates of Annualized Burden Hours and Costs

An estimate of the number of disasters that would warrant data collection is difficult to calculate due to the unpredictable nature of disasters. For example, in 2012, there were 95 disasters nationwide but OHSEPR did not collect data on all of them because they had minimal effects on ACF programs.

The annualized burden hours is estimated based on the average use of Disaster Information Collection Forms over the past three years.

The table 1 for a list of previously approved generic information collections (GenICs) under this umbrella generic. We are requesting an extension of approval of these forms. We have also included burden for additional requests under this generic, as needed.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Children's Bureau Information Collection Form	10	1	1	10	\$48.56	\$485.60
Family Violence Prevention Service Program Disaster Information Collection Form	10	1	1	10	\$48.56	\$485.60
Office of Child Care Disaster Information Collection Form	7	1	2	14	\$48.56	\$679.84
Office of Head Start Disaster Information Collection Form	10	1	2	20	\$48.56	\$971.20
Runaway and Homeless Youth Disaster Information Collection Form	10	1	1	10	\$48.56	\$485.60
Future Program Office Disaster Information Collection Forms	40	1	1.5	60	\$48.56	\$2,913.60
			Estimated	124	Estimated	\$6,021.44

			Annual Burden Total:		Annual Cost Total:	
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The average hourly wage was obtained from the Bureau of Labor Statistics job code 21-1099. The mean hourly wage from May 2021 is \$24.28 per hour. To account for overhead and fringe benefits, we multiplied this amount by two: \$48.56.

https://www.bls.gov/oes/current/oes_stru.htm

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

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

Federal staff costs are contingent on disaster frequency. In the event of a disaster federal staff costs are estimated to be 20% of the time (8 hours out of 40 per week) of a Program Specialist (GS-12, Step 4 for average) to oversee the data collection, respond to inquiries, and aggregate the data. Estimating that the disaster information collection will last approximately six months (24 weeks) at this rate. The GS-12, Step 4 rate used in the calculation includes a locality adjustment rate for Washington D.C.

GS-12 rate of \$47.51 x 8 hours x 24 weeks = \$9,121.92 (total estimated cost)

15. Explanation for Program Changes or Adjustments

There are no changes to the information collection since the last OMB approval. This request is to continue use of the overarching generic clearance, including submission of new generic information collections (GenICs) and the continued use of previously approved GenICs.

16. Plans for Tabulation and Publication and Project Time Schedule

Not applicable. Data will not be published.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable. No statistical methods of analysis of the Disaster Information Collection Form are proposed.