Generic Clearance for Disaster Information Collection Form

OMB Information Collection Request 0970 - 0476

Supporting Statement Part A -Justification

July 2025

Type of Request: Extension with No Changes

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 Disaster Information Collection Forms tailored for each of the following five 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. ACF also has a standard Disaster Information Collection Form (*Services for Planning Emergency Action and Response Form*) that can be used as-is, or tailored by program offices to create their own form for submission under this generic. 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 substantive 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 the lives of children, individuals, and families. Disasters interrupt the delivery of services and impact 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 with ACF program offices to understand and 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 both natural (e.g., tornado, earthquake, and hurricane) and manmade (e.g., chemical spill or water contamination) disasters.

¹ U.S. Department of Homeland Security. Presidential Policy Directive / PPD-8: National Preparedness. DHS; c2011 [cited 2025 June 03]. Available from: <u>https://www.dhs.gov/presidential-policy-directive-8-national-preparedness</u>

² U.S. Department of Homeland Security. National Response Framework. DHS; c2019 [cited 2025 June 03]. Available from: <u>http://www.fema.gov/national-response-framework</u>

³ U.S. Department of Homeland Security. National Disaster Recovery Framework. DHS; c2015 [cited 2025 June 01]. Available from: <u>http://www.fema.gov/national-disaster-recovery-framework</u>.

Due to the unforeseen nature of disasters, this generic mechanism – which allows for quick submission, review, and approval under the Paperwork Reduction Act – is necessary to allow ACF/OHSEPR to conduct this work. ACF must be able to collect disaster-specific information to provide strategic and tailored assistance to the impacted award recipients, communities, and disaster survivors. If this information is not collected, ACF/OHSEPR and the ACF program offices will be limited in their ability to support the affected award recipients, who rely on federal program officials for technical assistance to respond to and recover from 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 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 enable ACF to utilize the Disaster Information Collection Forms:

- This information collection is related to and funded by OHSEPR, in relation to its responsibilities for human services case management for federally declared disasters. See Further Consolidated Appropriations Act, 2024, Pub. L. 118-47, Div. D, Tit. II, 138 Stat. 460, 667 (Mar. 23, 2024) ("Provided further, That \$1,864,000 shall be for a human services case management system for federally declared disasters, to include a comprehensive national case management contract and Federal costs of administering the system."). See also Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. 119-4, Div. A, Tit. A, Sec. 1102 (making appropriations for HHS for FY25 available at to the same extent and in the manner that would be provided by the pertinent Appropriations Act from FY24).
- The information collection is being conducted by OHSEPR in collaboration with ACF program offices. See Office of Human Services Emergency Preparedness and Response Statement of Organization, Functions, and Delegations of Authority, 85 Fed. Reg. 52607 (Aug. 26, 2020) (generally making OHSER responsible for working closely with ACF program offices and coordinating ACF's planning, policy, and operations for emergency and disaster preparedness, response, and recovery, including coordinating information management needs of disaster human services response and recovery operations).

2. Purpose and Use of the Information Collection

The response and recovery phases of a disaster involve supporting the community back toward normal functioning. Recovery is immediate and overlaps with response. It includes

actions such as providing essential human services operations.⁴

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 award recipients 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 award recipients 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.

The assessment that is received from the ACF programs (discretionary and mandatory), award recipients, 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.

Currently (July 2025), ACF has five Disaster Information Collection Forms tailored for each of the 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 RHY Program. ACF also has a standard Disaster Information Collection Form (*Services for Planning Emergency Action and Response Form*) that can be used as-is or tailored by program offices to create their own form for submission under this generic as an individual generic information collection (GenICs).

3. Use of Improved Information Technology and Burden Reduction

The *Services for Planning Emergency Action and Response Form*, which is the standard version of the Disaster Information Collection Form, is delivered to award recipients and state administrators as a link to an electronic survey via email. Respondents return this form through the electronic survey platform. Other ACF program-specific forms are sent to award recipients as an email attachment (fillable PDF or Word document). If the impacted respondents are unable to access a computer due to damages from a disaster, ACF program staff work with the award recipients or state administrators by telephone to enter the data into

⁴ U.S. Department of Homeland Security. National Response Framework. DHS; c2013 [cited 2019 April 01]. Available from: <u>http://www.fema.gov/national-response-framework</u>

the appropriate form.

4. Efforts to Identify Duplication and Use of Similar Information

OHSEPR works closely with ACF program offices and other federal partners. 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 to 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 award recipients, 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 award recipients. State administrators and award recipients depend on immediate federal guidance and technical assistance to respond to and recover from disasters.

Obstacles to collecting the data are unique to each 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 May 15, 2025 (90 FR 20675) and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Not applicable; these forms do not generally request personally identifiable information (PII). If an individual request proposes to collect any PII, that request will provide a justification when submitted for review and approval.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

The average burden hours per response are estimates based on federal employees' experience with filling out the forms. The estimated number of responses are based on prior years. When new GenICs are submitted under this umbrella generic, detailed information about burden estimates will be included with each GenIC. Table A1 provides the ongoing burden associated with currently approved individual information collections. Table A2 provides burden estimates for potential new tailored GenICs.

Estimated Cost to Respondents

Social workers will complete the forms. The total number of burden hours to complete each the forms is 104. The job code is 21-1029 and wage data from May 2024 is \$35.91 per hour. To account for fringe benefits and overhead, the hourly rate (\$35.91) is multiplied by two, which is \$71.82. https://www.bls.gov/oes/current/oes_stru.htm

Table A1: Ongoing A	Approved Inf	ormation Coll	ections	

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Information Collection	Total	Total Number	Average	Annual	Average	Total

Title	Number of Respondents	of Responses Per Respondent	Burden Hours Per Response	Burden Hours	Hourly Wage	Annual Cost
Children's Bureau Disaster Information Collection Form	10	1	1	10	\$71.82	\$718.20
Family Violence Prevention and Services Program Disaster Information Collection Form	10	1	1	10	\$71.82	\$718.20
Office of Child Care Disaster Information Collection Form	7	1	2	14	\$71.82	\$1,005.48
Office of Head Start Disaster Information Collection Form	10	1	2	20	\$71.82	\$1,436.40
Runaway and Homeless Youth Program Disaster Information Collection Form	10	1	1	10	\$71.82	\$718.20
Services for Planning Emergency Action and Response Form (Standard - Current)	400	1	.1	40	\$71.82	\$2,872.80
Estimated Annual Burden and Cost Totals:				104		\$7,469.28

Table A2: Burden for Potential New Information Collections

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Averag e Hourly Wage	Total Annual Cost
Services for Planning Emergency Action and Response Form (Tailored or Standard)	60	1	1	60	\$71.82	\$4,309.20

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

The annual cost to the federal government is estimated to be \$13,106.52. This number was estimated using the following calculation:

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. Therefore, the total for ACF staff is \$47.51 times 8 hours times 24 weeks, or \$9,121.92.

Prior to OMB review of this extension request, contractor services, through the use of a data scientist subject matter expert, assisted with the lower-burden information collection and its availability on an agency-approved electronic survey platform. The hourly rate was \$199.23 with support for 20 hours. The total cost was \$3,984.60.

15. Explanation for Program Changes or Adjustments

There are no substantive changes to the information collection since the last OMB approval. A non-substantive change request to update two forms was approved in June 2025. This request is to continue use of the overarching generic clearance, including submission of new 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.