

PUBLIC COMMENT

Re: OMB Control No. 1660-0085 - Crisis Counseling Assistance and Training Program

To the Office of Management and Budget:

I submit this comment regarding the Federal Emergency Management Agency's request to extend, without change, OMB Control No. 1660-0085, Crisis Counseling Assistance and Training Program (CCP).

I support the underlying purpose of the CCP and recognize the importance of providing timely crisis counseling and behavioral health assistance following presidentially declared disasters and emergencies. However, FEMA's burden estimates should be subject to meaningful scrutiny before OMB approves the requested extension.

FEMA estimates 90 respondents, 108 annual responses, and 1,728 total annual burden hours. This equates to an average of 16 burden hours per response. FEMA should be required to provide sufficient empirical and methodological support demonstrating that this estimate accurately reflects the actual time required of State, local, and Tribal governmental entities.

The collection encompasses substantially different activities, including Immediate Services Program applications, Regular Services Program applications, final reports, quarterly reports, needs assessments, plans of service, program-management information, and accompanying budget information. These activities are not necessarily comparable in complexity or preparation time. Presenting only an aggregate annual burden figure can obscure significant differences among individual information-collection instruments.

OMB should therefore require FEMA to disclose, at minimum:

- 1 The estimated number of respondents and responses attributable to each form and reporting requirement;
- 2 The estimated burden hours per response for each individual application and report;
- 3 The methodology used to establish those estimates;
- 4 Whether FEMA relied on actual completion-time data from prior CCP applicants and recipients;
- 5 Whether the estimates include time spent gathering records, coordinating among agencies, reviewing instructions, conducting needs assessments, preparing budgets, obtaining internal approvals, performing quality-control review, and submitting or correcting information;
- 6 The occupational categories and wage assumptions used to calculate the reported \$189,718 annual respondent cost; and
- 7 Whether FEMA evaluated differences in burden between jurisdictions with substantial CCP experience and jurisdictions responding to the program for the first time.

These distinctions are particularly important because disaster-response grant applications frequently require coordination among program personnel, financial staff, behavioral-health professionals, emergency-management officials, executive leadership, and other governmental entities. The Paperwork Reduction Act burden is not limited to the time required to enter information onto a form. It should account

for the time reasonably necessary to review instructions, acquire and compile information, complete and review the collection, and transmit the required information.

FEMA also reports zero respondent operation and maintenance costs and zero capital or start-up costs. OMB should ensure that these estimates are supported by the actual administrative processes required to comply with the collection and are not simply carried forward from previous approvals without reassessment.

The fact that FEMA received no comments during the prior 60-day comment period should not be interpreted as evidence that the existing burden estimates are accurate. Absence of public comments is not a substitute for empirical validation of an agency's assumptions under the Paperwork Reduction Act.

Before approving this extension, OMB should require FEMA to provide a transparent, instrument-by-instrument burden analysis and explain whether its estimates have been validated against the actual experiences of recent State and Tribal CCP applicants and grant recipients. If FEMA has not collected sufficient information to validate those assumptions, OMB should direct the agency to conduct such an assessment and revise its estimates as appropriate.

Accurate burden accounting is especially important in disaster-response programs. State, local, and Tribal personnel completing these requirements may simultaneously be managing substantial operational demands arising from the same disaster that created the need for CCP assistance. Underestimating administrative burden can therefore conceal real costs imposed on jurisdictions at precisely the time when their personnel and resources are most constrained.

I respectfully request that OMB closely examine FEMA's methodology and approve OMB Control No. 1660-0085 only after determining that the burden and cost estimates are transparent, adequately documented, and reasonably representative of the actual work necessary to comply with the collection.

Thank you for considering this comment.