

Submitted via www.reginfo.gov

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Director, Information Management Division
Federal Emergency Management Agency
500 C Street, SW
Washington, DC 20472

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RE: Agency Information Collection Activities: Submission for OMB Review;
Comment Request; FEMA-Administered disaster Case Management Form,
Docket ID: FEMA-2021-0018; OMB No 1660-NW132

Dear Director,

Catholic Charities USA (CCUSA) respectfully submits this comment regarding the Agency Information Collection Activities: Submission for OMB Review; Comment Request; FEMA-Administered Disaster Case Management Form. We are concerned about the proposed changes to the Release of Information and Intake Forms.

CCUSA is a national membership organization representing more than 167 diocesan Catholic Charities member agencies, which operate 3,500 service locations across the country. Last year, 363,000 individuals received disaster assistance from 63 agencies. CCUSA responded to 73 disasters caused by wildfires, hurricanes and tornadoes in 32 states and four U.S. territories. Our direct relief efforts meet immediate needs and continue, sometimes for many years, with long-term relief efforts to help individuals and families rebuild their lives after a disaster. In so doing, Catholic Charities member agency staff routinely witness homes damaged and undeclared from previous storms that are then deemed ineligible for assistance in the current disaster. This most often occurs in underserved, rural and otherwise distressed communities that most need the assistance. Catholic Charities agency staff assist with recovery efforts by providing disaster case management and helping those affected complete the necessary forms to receive FEMA assistance.

The Disaster Case Managers walk through the recovery journey alongside their clients, all of whom are served according to their inherent worth and dignity. These disaster survivors deserve respect, self-determination and attention to

privacy, as well as non-judgmental and non-discriminatory assistance. Grounded in this method of service, we share the perspective and recommendations from Catholic Charities disaster case managers regarding the proposed changes to the Intake Form and the Release of Information Form.

Intake Form

Overall the intake form is too long. There are too many questions for the client to answer and many are more invasive than necessary to provide disaster case management services. For example, the children's section is too intrusive for the client, out of scope for the disaster case managers and goes well beyond basic questioning. Typically, clients are asked if they need assistance in establishing or re-establishing childcare or education opportunities. Follow up would then be conducted by the Disaster Case Manager within the recovery process. This form, though, goes a step further in gathering information on pre-disaster family conditions that often make clients uncomfortable. This information is not needed for determining next steps to the specific client's recovery and should be removed. If a referral is needed to additional social services, the Disaster Case Manager can discuss his/her concerns with the clients. This is part of the established relationship of mutual trust. The intrusiveness of unnecessary questions could undermine that relationship.

This assessment also skips an important question: Are there children in the household? The assessment assumes the client has children. There is no option to skip this section. In addition, this line of questioning is contradictory to the intent of Paperwork Reduction Act of 1995, which is to reduce paperwork and respondent burden. We recommend that you streamline the questions to cover only those that have to do with disaster recovery.

Senior Services Assessment

The senior services section is confusing. People housed at an assisted living facility or nursing home would not qualify for direct assistance as they would be part of the facility. They would not be part of a household. This section should be removed and replaced by a qualification section in the beginning of the form that asks the basic question: 1. If disaster survivor is head of household and over the age of 65, was the person living in senior housing, assisted living facility, or in a nursing home prior to the disaster? If the client was living in an assisted living facility or a nursing home, please refer the client to facility contacts to discuss further needs.

Administrative Information

Under Tier Levels section:

The Tier Levels need clarification. Tier 5 should be explained or a description of the Tiers should be provided in the beginning of the section instead of only in the drop downs. Using drop down fields assumes that Intake will be done via computer when that might not be possible due to the nature of the disaster event.

Under Client Case Status section:

The request for client status offers options that do not make sense for an initial intake and assessment (i.e., Successful case closure). Intake and Assessment forms are for clients who need assistance and are to be completed at the very beginning of the Disaster Case Management process. More appropriate options are: Open case, Ineligible, Refer to Social Service providers.

Under Self-Identified Disaster-Caused Unmet Needs section:

- There is a duplicate information box: 1. Treatment of illness or physical injury (e.g., Replacing prescriptions lost due to the disaster) 2. Assistance with replacing prescriptions or treatment of an illness or physical injury.
- Legal Assistance (obtaining services or fees) – what fees? Fees for providing legal services would not be covered under Disaster Case Management. Payment for legal services may be covered depending on the specific disaster-related issue for which the legal assistance was provided.

Questions for Clarification

- Who determines costs of goods or services? Does overhead count in ROI?
- Are Case Notes intended to be entered on this form?
- Are there any additional instructions or guidelines for completing this form?
- Will the Intake document be updated after the initial assessment?
- Can the document be uploaded to allow clients to complete online or does it have to be completed with the case manager/case worker?
- Financial Assessment – Under both pre- and post-disaster assessment and benefits receiving, should there be a “none” option to show this was asked/discussed (SSDI, SSI, etc.)?
- Food Assessment – Under both pre- and post-disaster assessment should there be a “none” option listed to show this was asked/discussed (WIC, SNAP, Meals on Wheels, etc.)?

- FEMA/SBA section assumes that the client is eligible for FEMA assistance. What about those who are not eligible or those who need help filling out the forms? This section should include follow up (not every service delivery needs to be listed as a referral) with the client to determine FEMA eligibility, and if eligible, to assist the client with the application process.

Recommendation for Additional Questions

- Add a question regarding home ownership. For example, does the client own or rent his/her home? This is extremely important information to capture as it will either provide or limit some resources and referral options.
- Add a question regarding food and type (e.g. baby food) within the Food Assessment.
- Referral Services:
 - The furniture and appliances section should include an option for Furniture only.
 - The housing section only provides options for temporary housing issues. There should also be an option for housing repairs, home rebuild, or other long-term recovery issues.
 - This section also includes a typo. It should read Tarp/Blue Roof instead of Blue room.
- Recovery Plan:
 - This section does not include a place for an actual recovery plan.
 - There should also be two signature lines for the client(s).

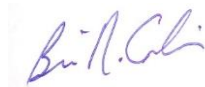
Authorization for the Release of Information under the Privacy Act

- The first sentence of this form is confusing for those filling it out. Who is “any designee”? Is this FEMA personnel?
- DCM Case Number – does FEMA intend to have its own DCM case numbers? This could cause a lot of confusion for disaster survivors who are also clients within a Long-Term Recovery Group with its own DCM Case Numbers.
- Section A – Why is a release needed to provide information to a co-applicant? Wouldn’t this information be the same?
- Sections A and B should be in reverse order on the form.
- While Section B allows clients to cross out information that those in Section A or Section B are requesting, it does not allow for ONLY those listed in Section A or Section C to receive the information. More guidance on what is included in a Case File should be provided to the client in Section B allowing them to make an informed decision regarding what information can be shared and what information should be removed.

- Section C should not be “optional”. Clients should know what information is contained in their case file and choose which information can be shared as they did in Section B. The very detailed information on clients included in the case file may not be appropriate for any of the groups listed in Section C to have.
- Section C, Box 3 – Clicking this box would potentially cause a huge breach in confidentiality. This would allow ANY organization that is part of a VOAD/COAD to receive private client information instead of going through the Disaster Case Manager. The Disaster Case Manager is trained to share only “need to know” information. VOAD agencies involved in Mass Care do not need client-specific recovery information. These categories are too broad.
- Signatures – The applicant and co-applicant signatures should be on the same page. It’s very confusing if each party checks different boxes or different recipients.

Thank you for the opportunity to submit comments on the agency collection activities. Please do not hesitate to contact our offices should you have questions.

Respectfully submitted,



Brian R. Corbin
Executive Vice President
Catholic Charities USA