The Crisis Counseling Assistance and Training Program (CCP)

Section 416 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288, as amended) authorizes the President to fund mental health assistance and training activities in designated disaster areas. The Crisis Counseling Assistance and Training program (CCP) is designed to provide supplemental funding to States and federally recognized Tribes and Territories, for short-term crisis counseling services. The Center for Mental Health Services (CMHS), Emergency Mental Health and Traumatic Stress Services Branch (EMHTSSB) works with FEMA through an interagency agreement to provide technical assistance, consultation, and training for State and local mental health personnel, grant administration and program oversight.

There are two separate programs that can be funded:  the Immediate Services Program (ISP) and the Regular Services Program (RSP).  Funding may be requested for either or both programs.

Guidance for implementing both Crisis Counseling Programs is on the Substance Abuse and Mental Health Services, Center for Mental Health Services website at: http://mentalhealth.samhsa.gov/cmhs/EmergencyServices/progguide.asp.

(Refer to Crisis Counseling Program Sample Letters & Memos in Appendices for ISP & RSP.)

A timeline for the Crisis Counseling Program is on the following page.
CCP Typical Timeline

Disaster Event

Presidential Declaration

ISP Application Due

ISP

ISP extension while RSP application is reviewed

RSP Application Due

RSP

First Anniversary typically falls within this timeframe, depending on length of RSP extension period.

Day

0 14 60 0

(time varies)

(9 months)
Immediate Services Program (ISP)

The Immediate Services Program (ISP) is designed to assist individuals and communities in recovering from the effects of natural and human-caused disasters through the provision of community-based outreach and psycho-educational services. The funding, which is provided for eligible costs up to 60 days after the date of the disaster declaration, must be requested in writing within 14 days of the disaster declaration. Crisis counseling costs incurred from the date of the incident to the date of declaration may be reimbursable. The request for ISP funding is processed in the Joint Field Office. The Regional Administrator (RA) or his or her on-site designee, the Disaster Recovery Manager (DRM), is the approving official for ISP funding and may extend funding if an RSP request is pending. This allows for program continuity between the two funding periods.

If the application for funding the ISP is denied, the State may appeal the RA/DRM's decision in writing no later than 60 days following the date of the funding determination on the ISP application. The appeal process for ISP is a bi-level process. It is recommended that the State submit the first appeal as early as possible to allow for the bi-level appeal process to be completed within the 60-day deadline. The appeal must include information justifying a reversal of the decision. If the appeal is denied, the State can file a second appeal to the Assistant Administrator, Disaster Assistance Directorate, no later than 60 days after the date of the RA/DRM’s application decision. Appeals will not be accepted after the deadline.

IA Branch Director’s Responsibilities for ISP

1. **Determine need for a Crisis Counseling Program**

   Immediate contact should be made with the State Coordinating Officer (SCO) to determine the need for the Crisis Counseling Program. The FEMA IA Branch Director, through the State Individual Assistance (IA) Officer, may set up a meeting with State mental health contacts and the local and/or county providers to explain what the program can provide and how to apply. [In large disasters, the FEMA IA Branch Director may request a CC/DUA/DLS Specialist from Headquarters be deployed to assist in ISP implementation.]

2. **Determine need for a CMHS representative**

   If the State indicates an ISP is needed, the IA Branch Director decides whether to request on-site technical assistance from CMHS. CMHS can provide technical assistance by phone or in person. It is recommended that CMHS provide on-site technical assistance, when any of the following apply:
- The State has no prior experience with the Crisis Counseling Program or has not had a CCP in several years.

- The last time the State applied for CCP funding, they were denied.

- The disaster is large and the mental health needs are complex.

- Mental health personnel appear to be having difficulty with the application process.

Both FEMA and CMHS provide technical assistance to the State throughout the application process, delivery of services, and program closure for the ISP and RSP. **NOTE:** If CMHS is requested to provide on-site technical assistance, an invitational travel letter will need to be provided (see the staffing tab for a sample).

3. **Conduct briefing for crisis counseling service providers**

   The IA Branch Director or designee may conduct briefings even before the State determines if ISP funding is required. The purpose of the briefing is to introduce the crisis counseling workers to the disaster recovery operation and programs of FEMA, as well as the type services they can provide through the Crisis Counseling Program.

4. **Review and approve the ISP application**

   The State must initiate a needs assessment within 10 days of the declaration. The ISP application must be received with 14 days of declaration (no exceptions). The IA Branch Director or designee reviews the application with the assistance of the assigned CMHS Project Officer. If the CMHS Project Officer is not on-site, fax or email a copy to them for review and recommendation.

   The following components must be included in the ISP application:

   (a) Cover letter signed by the Governor’s Authorized Representative (GAR) requesting ISP funding.

   (b) The geographical areas within the designated disaster area for which services will be provided. Verify that the local providers identified in the application serve the designated area.

   (c) An estimate of the number of disaster survivors requiring assistance. FEMA and the State Office of Emergency Services should coordinate and provide figures to be used in the needs assessment. If the State obtains the figures for the needs assessment without FEMA assistance, the IA Branch Director should verify that the estimated number of survivors requiring
assistance is consistent with the extent of the damage and the number of people impacted by the disaster.

(d) A description of the State and local resources and capabilities and an explanation of why these resources cannot meet the need.

(e) A description of crisis counseling response activities from the date of the disaster incident to the date of the application. The State may be reimbursed for these costs.

(f) Determine that the plan of services addresses all special populations and is sensitive to the unique social situations and community needs as identified by the disaster response and recovery effort. The plan of services and budget should correspond.

(g) A detailed budget, showing the cost of proposed services separately from the cost of reimbursement for any eligible services provided prior to the application. Separate budgets should be included for each service provider. Budget expenditures must be appropriate and justified.

(h) The State must itemize all in-kind contributions. The budget must be detailed by categories. Typical categories used by States include: salary and wages, fringe benefits, contracted consultation, travel and transportation, equipment and furniture, office supplies, office rental space, training, administrative support costs, telephone and utilities, public information, and postage.

(i) Miscellaneous categories are not allowable. Examples of inappropriate costs include, but are not limited to: medication, food, mainstream mental health services for existing clients, facility renovation or repairs, psychological testing, research, and videotape production.

5. **Allocate and Obligate Funds**

If all ISP requirements have been met and funds are approved, an allocation should be requested. Funds should be allocated under fund code 4152. Check the initial allocation advice to see if funds have already been allocated. If not, process request for allocation in the NEMIS ES module.

After funds have been allocated, prepare an obligation in the NEMIS ES module under fund code 4152. The Region obligates ISP funds; HQ obligates RSP funds.

The RA or DRM has authority to approve the ISP and obligate funds. Prepare a letter to the Governor’s Authorized Representative (GAR) from the RA or DRM advising that the ISP funding has been approved and that funds are available for drawdown in SMARTLINK.
6. **Monitor Program**

FEMA and CMHS monitor the program to ensure that the program goals are achieved and that the State and local providers comply with the terms of the grant. The IA Branch Director or designee monitors the program by general oversight, review of mid-program and final reports, participation in conference calls, and site visits.

The State submits a mid-program report only when an RSP application is being prepared. The report should be included as a part of the RSP grant application, and describe staff training activities, services provided to date, and transition plans from ISP to RSP activities.

7. **Request additional funding or extension of program or filing of final voucher**

The State may request an extension of funding to cover costs while a decision on the RSP application is pending. They may request a no-cost time extension. Any extension request must be in writing. The RA or official designee may approve the extension for the ISP funding.

8. The final Program Report is submitted to the RA/DRM, SCO, and the CMHS Project Officer 90 calendar days after the last day of ISP funding. The report should describe the program activities and services, training activities, and if an RSP is ongoing, the transition from ISP to RSP activities. The final accounting of funds, SF-425 should be included with the Final Program report.

9. The IA Branch Director ensures that the Region de-obligates and de-allocates any excess ISP funds. The ISP funds may not be carried over to the RSP. Update the IA financial spreadsheet.

10. **Close ISP**

The final accounting of funds, SF-425, is due to FEMA 90 calendar days after the last day of funding and should be submitted with the Final Report. The IA Branch Director reviews the documentation to assure all expenditures are in compliance with the terms of the grant. Information is verified in IFMIS, DARIS, and SMARTLINK for accuracy. Corrections are made if necessary.

A memorandum from the RA or DRM is prepared notifying closure of the ISP grant. The memorandum and the original SF-425 are sent to the HQ Office of Financial Management with a copy to the Headquarters Program Specialist, and the Regional ARP.
Regular Services Program (RSP)

The Regular Services Program is designed to provide up to nine months of crisis counseling, community outreach and consultation and education services to people in a designated disaster area. Funding for this program is separate from the Immediate Services Program grant. The request for funding must be submitted within 60 days of the disaster declaration. Both FEMA and CMHS review the RSP grant application.

Recommendations are forwarded to the Assistant Administrator, Disaster Assistance Directorate, through the HQ Program Specialist for final determination. If approved, the grant is awarded and administered by CMHS. CMHS provides technical assistance through an interagency agreement with FEMA. Both FEMA and CMHS monitor the RSP.

The State may appeal the Assistant Administrator, Disaster Assistance Directorate, decision within 60 days of the date of notification of the decision. The appeal must be in writing and include information justifying a reversal of the decision.

IA Branch Director’s Responsibilities for RSP

1. **Determine the need for an RSP**

   The State may request an RSP even if it did not implement an ISP. Examples of situations that warrant an RSP, but not an ISP, include, but are not limited to:

   (a) State and local resources could meet the immediate needs, but services cannot be sustained for nine months without Federal assistance.

   (b) The need for mental health intervention is not apparent until after the 14-day ISP application deadline.

   The State should submit the RSP application within 60 days of declaration. The request is submitted to the Assistant Administrator, Disaster Assistance Directorate, attention HQ Program Specialist, through the RA or DRM with a copy to CMHS.

   CMHS and FEMA staff provide technical assistance to the State in preparing the RSP application.
2. **Review of RSP application**

   (NOTE: The RSP application and instructions can be found at [http://mentalhealth.samhsa.gov/cmhs/EmergencyServices/progguide.asp.](http://mentalhealth.samhsa.gov/cmhs/EmergencyServices/progguide.asp))
   
   CMHS will conduct a review of the application and recommend approval or disapproval of the application. The CMHS recommendation is sent to the Regional Administrator or Disaster Recovery Manager.

3. **Allocate Funds**

   If the RSP application is approved, the IA Branch Director prepares and processes a request for allocation of funds and notifies the DRM and Comptroller. The allocation is under object code 25XX, sub-object code 2504.

4. **Approval Recommendation and Obligation of Funds**

   The IA Branch Director or designee prepares a memo forwarding the CMHS recommendation along with the Regional recommendation to the Assistant Administrator, Disaster Assistance Directorate. HQ will review the CMHS and Regional recommendations and make a decision to approve or disapprove the application. The memo also requests HQ to obligate the RSP funds, if approved, under sub-object code 2504.

   The FEMA Finance Center obligates the funds, which are electronically transferred to CMHS via Online Payment and Collection System (OPAC) billings. CMHS then awards the funds to the State and the State transfers funds to county mental health and local providers. CMHS provides the State Mental Health Authority with a Notice of Grant Award, which includes a number that is used by the State to draw down the funds, and sends the State a letter with reporting requirements and beginning and closing dates.

5. **Letter to GAR approving RSP**

   A letter is prepared to the GAR notifying him/her of RSP approval, date the program starts, funds available for drawdown, reporting requirements and program closure date.

6. **Program Monitoring**

   CMHS is the primary source for program monitoring. FEMA participates in all activities with CMHS in monitoring the program. Monitoring is necessary to ensure that the Crisis Counseling Program goals are achieved and that the State and local providers comply with the terms of the grant. The IA Branch Director or designee monitors the program by general oversight, review of quarterly and final reports, participation in training, conference calls, and site visits.
The first quarterly report is due 120 days after the project start date; the second quarterly report is due 210 days after the project start date. The IA Branch Director or designee should compare the plan of services and budget in the RSP application to the quarterly reports. If RSP activities are not progressing as planned, the reasons should be described. Information in the first quarterly report that raises questions or concerns should be discussed with CMHS and addressed during the site visit. Additional site visits may be necessary if there are concerns with information provided during the site visit or in subsequent reports. If CMHS staff comes to the JFO, the IA Branch Director should issue a letter of invitational travel.

The final report is due within 90 days of the project end-date, along with the interim accounting of funds. The IA Branch Director should compare the final report, the plan of services, and interim accounting of funds to the RSP application to determine if the objectives were achieved and if expenditures comply with the approved budget. Any concerns or problems should be communicated to CMHS and the FEMA Headquarters Program Specialist.

The IA Branch Director or his or her designee and CMHS make joint site visits to ensure that the project is on track and being administered according to the approved grant application. This is accomplished through meetings with project staff, school officials, and local agencies and organizations.

7. Requests for Extensions or Additional Funding

The State’s request for a time extension for filing the final voucher or request for additional funds must be made to the RA or DRM. After consultation with CMHS the IA Branch Director drafts a recommendation from the RA/DRM to the Assistant Administrator, Disaster Assistance Directorate through the HQ Program Specialist. The IA Branch Director may need to allocate additional funds if necessary. HQ will obligate the funds.

8. RSP Closure

The State provides CMHS with a final accounting of funds within 120 days after the program closure. They provide the IA Branch Director with copies for review. CMHS fiscally closes the contract and returns unexpended funds via OPAC billing to FEMA HQ within 120 days after the program closes. CMHS sends a copy of the OPAC report to the HQ Disaster Assistance Directorate, which submits the necessary documentation for closeout to Office of Financial Management. A memo is prepared by the IA Branch Director forwarding the SF-425 to the HQ Disaster Assistance Directorate requesting them to process the closure.

Items of equipment purchased with FEMA funds that have a current per-unit, fair-market value of less than $5,000 may be retained, sold, or otherwise disposed of by the State with no further obligation to FEMA. Items of
equipment with a current per-unit, fair-market value in excess of $5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency’s share of the equipment.

Verify that the figures in IFMIS are the same as ones on the final voucher. De-allocate any excess RSP fund.