Supporting Statement for Paperwork Reduction Act Submissions

Title: State Domestic Preparedness Data Collection Tool Emergency Reinstatement

OMB Control Number: 1651-0101

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval. To complete the supporting statement, type in your responses in the white space below each question. Your responses should be full and complete and provide sufficient information to help the OMB desk officer to understand what you are planning to do and why and how the Agency/Federal Government will benefit from and use the information you will be obtaining or soliciting.

Specific Instructions
A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Congress has requested a survey of State and local government emergency officials that will identify problems relating to the effectiveness and user-friendliness of programs that DHS uses to interact with State and local officials, including: grant management, intelligence sharing, training, incident management, regional coordination, critical infrastructure prioritization, and long-term homeland security planning. An interim report was due to Congress June 30, 2006 with a final report due September 30, 2006. The Preparedness Directorate, National Preparedness Task Force (NPTF) has been assigned the lead on this effort. DHS has submitted, and received, a 120 day extension for this requirement from Congress.

Our goal is to receive approval to submit an emergency reinstatement request for the Fiscal Year 2003 State Domestic Preparedness Program Data Collection Tool (OMB control number: 1651-0101) which expired on April 30, 2006.

2**.** Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The National Preparedness Task Force is surveying homeland security officials and first responders to help assess the effectiveness and user-friendliness of DHS programs. The results of this survey will guide ongoing efforts to improve DHS programs that serve State and local emergency officials. Feedback from stakeholders across the country is critical to this initiative.

The responses will be aggregated and reported to Congress in December 2006. No survey respondent names will be used in the report. The results of the survey will be drawn upon to gauge the usability and effectiveness of DHS programs and to identify areas for potential improvements.

The identification and review of existing DHS data served two useful purposes: first, the data helped to identify best practice methodologies in surveying respondents regarding governmental functions; second, the analysis of this data will provide a contextual landscape for the final results of the survey.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

All information will be collected via a web-based instrument available at www.dhssurvey.org after an introductory letter has been sent via email. Subsequent telephone calls will be made to non-respondents to encourage participation and establish an adequate response rate. DHS will compile the respondent data into database format from which analysis will be conducted.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

DHS searched for all similar surveys that have been conducted. Researchers identified ten previous surveys related to homeland security issues, each of which did not fulfill the content or methodological goals of this congressionally mandated survey. Hence, there will be no duplication. These previous surveys did, however, provide context for analyzing the final results of this project.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

N/A. Small businesses or other small entities will not be impacted by this survey.

6. Describe the consequence to Federal/DHS program or policy activities if the collection of information is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this survey is not conducted, the Congressional requirement will not be met. In addition, Federal/DHS programs and policies will not incorporate specific needs of State and local government emergency officials. As a result, said programs and policies will not effectively or efficiently achieve their preparedness missions.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (a) Requiring respondents to report information to the agency more often than quarterly.

N/A. Respondents will not be required to report information more often than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

N/A. Respondents submit information via the online application or via telephone and have more than 30 days to respond.

(c) Requiring respondents to submit more than an original and two copies of any document.

N/A. Respondents do not submit any documentation.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

N/A. Respondents are not required to retain any records for this survey.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

N/A This survey tool will produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

N/A. This survey was composed to fulfill the guidelines of "Questions and Answers When Designing Surveys for Information Collections", Office of Information and Regulatory Affairs, Office of Management and Budget, January 2006.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

N/A. This survey does not include a pledge of confidentiality that is not supported by established authority in statute or regulation.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

N/A. National Preparedness Task Force does not collect proprietary or confidential information.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

DHS reviewed these points with its Centers of Excellence, which include academic institutions throughout the country. Moreover, DHS utilized doctoral experts for survey design and dissemination strategy.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

DHS will utilize the *Lessons Learned Information Sharing* (*LLIS.gov)* network to obtain the sample for the survey. *LLIS* is the national network of lessons learned and best practices for emergency response providers and homeland security officials and offers regular interaction with representatives of the community to be surveyed..

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

N/A. NPTF will not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All survey participants will be provided an assurance of confidentiality in accordance with OMB standards. The survey introductory letter and survey directions both specify that anonymity will be assured. As such, DHS will report all data in the aggregate.

Access to all databases will be restricted to approved project personnel. That access will be further restricted through the use of database roles and user groups. These security protocols ensure that data are only accessible to those individuals or groups that require access.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

N/A. NPTF is not requesting such information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

The estimated hour burden for the interview is based on an internal pre-test of the survey administered to seven subjects, using the online survey instrument proposed for the study. The survey is estimated to take no more than 20 minutes. Estimates are provided below.

Respondents	**No. of Respondents**	**No. of Responses per Respondent**	**Average Burden per Response (in hours)**	**Total Burden (in hours)**
State, Local and Tribal Government	2,059	1	.33 hours	679.47
Total				679.47

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

N/A. This request does not cover more than one form.

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

Costs to respondents are calculated using their time commitment during the survey. The table below shows the annual cost to respondents. Median U.S. salary was used as the basis for hourly calculations (assuming 2080 work hours per year). Hourly wage information is from the U.S. Census Bureau web site (http://www.census.gov/hhes/www/income/histinc/p01ar.html). The annual cost to respondents is estimated to be $7,793.52. The calculation is diagramed in the table on the following page.

Annually, the public burden is:

Respondents	**No. of Respondents**	**No. of Responses per Respondent**	**Average Burden per Response (in hours)**	**Total Burden (in hours)**	**Average Hourly Salary from Census**	**Total Dollar Estimate of Burden**
State, Local and Tribal	Goal of 2,059	1	.33 hours	679.47	Approx. $11.47	$7,793.52

Government						

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred Capital and startup costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection as appropriate. Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information to keep records for the government, or (4) as part of customary and usual business or private practices.

There are no other costs (Capital Costs, Operating or Maintenance Costs) to report.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such a equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

This collection of information will be conducted via an already established online instrument. There are no additional expenses beyond routine business operation costs of the National Preparedness Task Force that are anticipated at this time.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

Due to organizational restructuring, the NPTF was unable to renew this data collection tool before its expiration date. Due to the lengthy process necessary to secure approval of a new data collection tool under the OMB Paperwork Reduction Act, the NPTF must access the recently expired Fiscal Year 2003 State Domestic Preparedness Program data collection tool in order to fulfill the congressional requirement.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

DHS will provide the final report to Congress by December 28, 2006, per legislative instruction. As such, DHS plans to distribute the survey to potential respondents well before this deadline, pending congressional input. DHS intends to disseminate the survey in early October, 2006. As data is received, DHS will employ several complex analytical techniques to ensure the validity and reliability of the ultimate results. DHS will stratify the survey sample pool to fulfill congressional instructions. Researchers will initially analyze the results from this sample to identify and mitigate any potential non-response bias.

Once the pool of respondents has been analyzed for non-response bias and other potential flaws in the dataset, DHS will begin analysis of the content questions of the survey. General measurements of effectiveness and user-friendliness will be produced once all the survey responses have been collected. Additional analysis is needed, however, to focus policy choices and to maximize the value of the survey. Data will be analyzed on several additional levels: first, trends in the national community of responders and State and local homeland security officials; second, statistically significant differences in the responses of the different categories included in this study (fire, law enforcement, medical, and emergency planners); and third, differences that emerge with the various jurisdictional subgroups that have been identified (municipal, State, county, regional). The goal of the analysis is to provide a clear picture of the effectiveness and user-friendliness of DHS programs and to identify specific opportunities for improvement.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

N/A. NPTF is not seeking this approval.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

N/A. There are no exceptions in the NPTF submission.