

Supporting Statement A
ICE Secure Communities StakeholderID Assessment Questionnaire
(Form 70-008)
OMB No. 1653 - NEW

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 mandated that ICE must implement their new Secure Communities program. To do this effectively, we must first understand what resistance we will face and where that resistance resides. Only then can we create targeted communications to ensure that all ICE employees and state and local law enforcement officers are effectively working within the new program. To maintain Secure Communities, ICE must collect detailed requirements and input from its state and local law enforcement partners to focus resources on assisting all local communities in the removal of high-risk criminal aliens as authorized by 8 USC §1231, *Detention and Removal of Aliens Ordered Removed*.

The ICE Stakeholder Assessment's purpose is to understand the level of support and awareness of the Secure Communities program. This assessment will be a snapshot in time of a sample of state and local organizations that will be impacted in some way by the Secure Communities program to establish a baseline of attitudes prior to implementing the program in their state. It will also assess how their attitudes toward the program have changed 9-12 months after the implementation.

- 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 ICE Secure Communities questionnaire will be administered via e-mail invitation to a random sample of members of state and local organizations, defined as the State and Local stakeholder population. Responses will be collected regarding awareness and support, and respondents will be segmented into three groups: location, organization affiliation and job function. The information collected in this assessment will be used by ICE to create targeted messages to ensure that all stakeholders are aware of the Secure Communities program and are operating to fulfill its goals.

- 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.**

The information collection will be conducted via the Internet, by distributing a hyperlink via electronic mail to the survey recipients. The hyperlink will take the participants to the first page of the Web-based survey. The recipients are members of state and local organizations impacted by the ICE Secure Communities policies and programs. In compliance with the Government Paperwork Elimination Act (GPEA), the survey will be conducted electronically and all survey results (records) will be maintained electronically in a database.

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.**

Because Secure Communities is a new program, no information on attitudes toward the goals of this program exists. Likewise, no other initiative has been undertaken to assess stakeholder attitudes.

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 burden.**

This information collection does not have an impact on small businesses or other small entities.

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

If stakeholder attitudes are not assessed, deployment plans could be more challenging or take longer because communications are not tailored to the specific needs and concerns of the stakeholder groups involved. Likewise, stakeholders may not comply with the program due to lack of support for it, which would not otherwise be uncovered. Assessing stakeholders' attitudes will help identify those concerns and enable ICE to address them.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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; or

- **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.**

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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.**

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The agency's Federal Register Notice was published on April 14, 2009 and can be found at FR 74 17205. ICE did not receive any comments during the 60 day public comment period.

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

ICE does not provide payments or gifts to respondents in exchange for a benefit sought.

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

There are no assurances of confidentiality provided to the respondents for this information collection.

- 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 person's form whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

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

- **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 desirable. 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.

- 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.
- 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.

In pre-testing, respondents completed the Web-based questionnaire in less than 10 minutes. The total hour burden will depend on the number of respondents necessary for a representative sample. The maximum number of respondents would be 1000, thus the total possible hour burden would be 166.67 hours.

Annual Reporting Burden:

a. Number of Respondents:	1,000
b. Number of Responses per each Respondent:	1
b. Total Annual Responses:	1,000
d. Hours per Response:	0.1667 (10 minutes)
e. Total Annual Reporting Burden:	166.7

The projected hours per response for this collection of information were derived by first breaking the process into three basic components:

Learning about the Law and the Form:	3.33 Minutes
Completion of the Form:	3.33 Minutes
Assembling and Filing the Form:	3.33 Minutes
Total Hours per Response:	10 Minutes

Annual Reporting Burden

Total annual reporting burden hours is 166.7. This figure was derived by multiplying the number of respondents (1,000) x frequency of response (1) x (0.1667) hours per response.

Annual Cost Burden

The estimated annual cost burden is \$ 1,667. This estimate is based on the number of respondents (1,000) x number of responses (1) x hours per response (0.1667) x (\$10) average hourly rate;

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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: (a) 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 start-up 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 or keep records for the government or (4) as part of customary and usual business or private practices.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

- 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 as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Annualized Cost Analysis:

- a. Printing Cost: \$15,500
 b. Collecting and Processing: \$228,497.14

Survey 1,000 respondents; time to review data is included in the Social Scientists rates.

Task	Hourly rate	Hours	Total
Project Lead	\$146.82	535	\$78,548.70
Program Manager	\$142.67	116	\$16,553.20
Social Scientist 1	\$127.67	85	\$10,851.95
Social Scientist 2	\$99.59	638	\$63,538.42
IT Lead	\$120.23	60	\$7,213.80
Graphics Lead	\$74.60	60	\$4,476.00
Support Staff	\$37.42	65	\$2,432.30
Program Sponsor	\$223.42	78	\$17,426.76
Content Writer	\$97.03	283	\$27,456.01

\$228,497.14

- c. Total Cost to Program: \$243,997.14

d. Fee Charge: \$0
e. Total Annual Cost to Government \$243,997.14

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

There is no increase or decrease in the estimated annual burden hours as this is a new information collection.

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.

ICE does not intend to employ the use of statistics or the publication thereof for this collection of information.

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

ICE will display the expiration date for OMB approval of this information collection.

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

ICE does not request an exception to the certification of this information collection.