

# Supporting Statement for Paperwork Reduction Act Submissions

Title: DHS Office of Intelligence and Analysis (I&A) Customer Survey  
OMB Control No.: 1601-NEW  
Collection Instrument(s): DHS Form 6001

## 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 or 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.

## 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. Provide a detailed description of the nature and source of the information to be collected.**

The *Implementing Recommendations of the 9/11 Commission act of 2007* (PL 110-53) identifies the U/SIA as having the primary Federal responsibility for outreach and sharing threat related information and intelligence with State, local, tribal, and territorial officials (S&L). Section 511 of the 9/11 Act with regards to consumer feedback requires I&A to create a voluntary mechanism for any State, local, tribal, and territorial law enforcement officer or other emergency response provider who is a consumer of the intelligence or other information products of I&A to provide feedback to the Department on quality and utility of such intelligence products.

**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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.**

This is new collection for a pilot program. I&A Managers will use the survey results to establish exactly who within our S&L target audience our products are reaching and to generally gauge and make improvements to intelligence products that increase customer satisfaction and program effectiveness. The results of the customer satisfaction surveys will be shared with DHS HQ, I&A, and as mandated by section 511 of the 9/11 act presented to the Committee on Homeland Security and Governmental Affairs of the Senate and the Committee on Homeland Security of the House of Representatives.

**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.**

Applicants responding to the I&A survey will primarily be by email when they open and read the DHS FINTEL product. They will also be provided the opportunity of responding via web-based survey tools on HS SLIC. The pdf-based survey instrument is attached. If the respondent elects to complete the email pdf survey, it is submitted on-line to IA.Feedback@hq.dhs.gov which is monitored by I&A.

**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.**

This information is not collected in any form, and therefore is not duplicated elsewhere.

**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.**

There is no impact on small businesses or other small entities.

**6. Describe the consequence to the DHS I&A 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.**

Section 511 of the 9/11 Act states the annually the Secretary shall submit to the Committee on Homeland Security and Governmental Affairs of the Senate and the Committee on Homeland Security of the House of Representatives a report that includes a description of the consumer feedback obtained and, if applicable, how the Department has adjusted its production of intelligence products in response to that consumer feedback. If DHS I&A is not permitted to collect this information I&A will be in breach of this mandate. This report is due August 3, 2009. Current feedback methods have provided minimal results and this effort, which will first be introduces in a pilot format with DHS I&A Borders

Security Division (BSD), is the way forward in the improvement of the DHS I&A consumer feedback mechanism.

**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.**

This information collection is conducted in manner consistent with guidelines in 5 CFR 1320.5(d)(2).

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

There is no requirement to provide a written response to the collection in less than 30 days after receipt of it.

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

There is no requirement to submit more than an original and two copies of any document.

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

There is no requirement for respondents to retain records for more than three years.

**(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.**

This information collection is conducted in manner consistent with guidelines in 5 CFR 1320.5(d)(2).

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

There is not use of statistical data classification in this collection that has not been reviewed and approved by OMB.

**(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.**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

**(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.**

There is no requirement for respondents to submit proprietary trade secret, or other confidential information for this data collection.

## **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.**

A 60-day Federal Register Notice inviting public comments was published. (74 FR 48994, September 25, 2009).

A 30-day Federal Register Notice inviting public comments was published. (74 FR 66372, December 15, 2009)

No comments have been received during the comment periods.

**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.**

An I&A representative consulted with currently deployed I&A Intelligence Operations specialists as well as numerous S&L consumers representing various states in person while they were in attendance of a Critical Infrastructure and Key Resources (CIKR) conference in May of 2009 regarding both the presentation and dissemination of the survey as well as specific questions to be asked. Input from these sources has led to the survey proposal being submitted at this time.

**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.**

I&A consulted with deployed I&A Intelligence Operations Specialists to ensure that the information we are collecting is meaningful to the customers they represent and the survey questions are clearly understood. I&A will conduct a review of focus groups within the pilot program sometime within the next six months to review the surveys performance and make appropriate adjustments.

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

There are no payments or gifts to respondents for this data collection.

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

The information we plan to collect is for the purpose of identifying the respondent. There are no assurances of confidentiality provided to the respondents for this information collection.

**11. Provide additional justification for any question 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.**

There are no questions of a sensitive nature required in this data collection.

**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 for each collection instrument (separately list each instrument and describe information as requested). 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.**

Estimated Annual Burden

Collection Instrument	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Time per Response (Hours)	Total Annual Burden (Hours)
DHS Form 6001	144	25	3600	.033 (2 mins)	120

**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.**

This request is only for a single form.

**c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

There is no cost to respondents. The survey can be concluded in less than two minutes and is attached to the FINTEL product with which it is associated requiring no further research and contains a macro that automatically submits the results to I&A.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

There are no record keeping, capital, start-up of 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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.**

There is no cost to the federal government for this information collection.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or**

**adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.**

This is a new 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.**

This information collection will not be published for statistical purposes.

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

This collection does not seek approval to not display the expiration date for OMB approval.

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.