**SUPPORTING STATEMENT FOR**

**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.

Response - The Department of Homeland Security TechSolutions program is responsible for providing information, technology, and training to the first responder community. Section 313 of the Homeland Security Act of 2002 (PL 107-296) established this requirement.

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.

Response - The goal of the Department of Homeland Security, Science and Technology Directorate, TechSolutions program is to provide first responders at all levels (federal state, local, and tribal police, firefighters, and Emergency Medical Service) a venue whereby they can submit capability gap ideas. The program conducts market research to identify whether a tool which meets the criteria of the submission is already available commercially.  If so, the submitter is notified and the process ends there.  If there is nothing available commercially, the program looks within the government to identify whether other R&D programs within S&T are working on a solution.  If so, the program provides additional funding to speed up development for a prototype as long as it can be completed within 12 months and cost $1 million or less.  If no partial solution is available within S&T, the program reaches out to government R&D programs, university programs, and industry to submit a white paper for a solution to the capability gap idea with the potential of moving to the proposal phase, and then possible award as long as a solution can be developed within the time and budget constraints.  In order to submit ideas, submitters must first register for an account, provide their first responder affiliation and then complete a form detailing their idea, the impact of the technology on the first response community, and the technology area and discipline to which it is applicable. No additional information is being collected from what was originally approved.

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.

Response - The TechSolutions program is using web based technology to collect submitter and capability gap information. In order to reduce burden and accommodate the geographical distribution of first responders throughout the country, web-based technology is the collection mechanism of choice. Information related to the TechSolutions program and the collection instruments referenced in Question #12 can be found at https://www.techsolutions.dhs.gov.

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.  
  
Response - The TechSolutions program has coordinated with FEMA, DHS S&T divisions, and members of the first response community (i.e. Inter Agency Board, National Firefighters Technology Resource Center) to determine if capability gaps, reported by first responders at a national level, are being captured and stored. No single entity has been identified as a national collection agent for this information. If an entity is identified in the future, TechSolutions will work with the identified collection agent to ensure a cooperative partnership is embraced.

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.

Response - The TechSolutions program has developed a web-based application which streamlines the collection of submitter and capability gap information. The system will minimize the burden on all interested parties who are knowledgeable of first responder capability gaps and have a desire to provide a submission.

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.

Response - The collection of submitter and capability gap information from first responders is voluntary. There is no established increment or frequency for collecting information. If capability gap information is not collected, the TechSolutions program will be unable to quickly respond to first responders needs as directed by Section 313 of the Homeland Security Act of 2002.

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.

Response - TechSolutions requires first responders or the vendor to submit a quad chart if their submission is selected for funding. A quad chart is a one page PowerPoint slide containing a brief project description, planned deliverables, payoffs achieved, and a three year funding projection. TechSolutions requests that Quad charts be provided within two work weeks (10 business days) of a project being selected for funding. No other special circumstances exist.

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.   
  
Response - By notice in the **Federal Register** on June 14, 2010 (75 FR 33631), DHS S&T notified the public that it was requesting comments on this information collection. The notice allowed for a 60-day public comment period. No comments were received. DHS S&T then by notice in the **Federal Register** on” August 30, 2010 (“” FR ””7), notified the public during a 30-day public comment period. No comments were received.

The TechSolutions program has consulted with the Department of Navy’s Office of Navy Research (ONR) regarding this initiative. ONR has established a similar system and data collection effort for acquiring capability gaps from Navy service men and women. The effort has been very successful. TechSolutions will be using similar data elements for its collection effort. TechSolutions, like ONR’s data collection requirements, are straight forward and require little guidance or clarity. ONR has not experienced issues with end users understanding requirements for collection. Reporting requirements for TechSolutions will be internal. The information collected and mechanism available for reporting meet all existing requirements.

Due to the wide geographic distribution of first responders throughout the country, it’s not realistic to assume personal correspondence will occur with each representative who submits information. Through web based technology, TechSolutions has implemented an automated mail reply that lets each submitter know his/her submission was received, the submissions progress thru the due diligence phases, and the final result. Additional follow up with submitters will occur after capability gaps are reviewed and ranked. If a capability gap is selected for funding, the TechSolutions program will be in continuous contact with the submitter until project completion.

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

Response - DHS S&T 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.

Response - TechSolutions assures that submitters will be kept anonymous and submissions will be properly kept secure until the capability gap has been fully vetted and the project has been funded. Once the project has been funded, information about the project may be released to the public. TechSolutions follows the Privacy Act of 1974 (Public Law 93-589), which mandates that personal information solicited from individuals completing Federal records and forms be kept confidential. TechSolutions’ Privacy Threshold Analysis (PTA) was approved March 2009 by the DHS Privacy Office and will be renewed per the PTA requirements. In addition, Tech Solutions will be operated in accordance with the E-Government Act (P.L. 107-347), December 2002 and the Federal Information Security Management Act (P.L. 107-347, Title III), December 2002.

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 from whom the information is requested, and any steps to be taken to obtain their consent.   
  
Response - There are no questions of a sensitive nature in this information collection.

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

**Annual Reporting Burden:**

|  |  |  |  |
| --- | --- | --- | --- |
| **DHS Form** | ***Register (10015)*** | ***Submit a Capability Gap (10011)*** | ***Information Request (10012)*** |
| No. of Respondents | 333 | 36 | 22 |
| No. of Responses per Respondent | 1 | 1 | 1 |
| Avg. Burden per Response (in hours) | 0.083  (5 minutes) | .25  (15 minutes) | 0.083  (5 minutes) |
| Total Annual Burden (in hours) | 28 | 9 | 2 |
| Average Hourly Wage Rate | $100 | $100 | $100 |
| Total Annual Respondent Cost | $2,800 | $900 | $200 |

**Annual Reporting Burden and Respondent Cost: The total estimated ICR Public Burden in hours is 39.** This figure was derived by summing the total annual burden hours from all forms. **The total annual number of respondents is 391.** This figure was derived by summing the number of respondents to each form.

# Public Cost: The estimated annual public cost is $3,900. This figure was derived by summing the estimated annual respondent costs for all forms.

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).  
  
Response - There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this information collection are identified in Item 14.

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.

Response - **The estimated annual cost to the federal government in relation to this information collection is $369,068.** This amount includes funding to cover costs related to the collection of information in staffing senior level directors, computer programmers, system administrators and mid level technical/engineers.  Costs also include the purchase of servers and software for collecting/retaining/storing the collected information.

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

Response – The DHS/S&T TechSolutions system is currently in the operations and maintenance (O&M) phase of its system life cycle. The upfront costs to develop the web based collection agent no longer apply. This in turn has substantially reduced the systems estimated annual maintenance cost. There has been an adjustment to the number of annual respondents and burden since the previous approval. This is specifically due to the fact that when the TechSolutions capability gap process was managed manually, there was no mechanism to triage questions, grants/training requests, and unsolicited proposals.  With the automated system, visitors of the site are directed to the appropriate DHS references/resources for grants, training, and unsolicited proposals.   As a result, the mechanism to appropriately triage submissions and requests has decreased the number of submissions. Since the initial release of the application, no change has been made to the data collected from the submitters. Future changes to the application may arise in changes to the process whereby the program reviews capability gaps, awards a project, and manages the project.

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.

Response - DHS S&T does not intend to employ the use of statistics or the publication thereof for this information collection.

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.

Response - DHS S&T will display the expiration date of OMB approval for 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.

Response - DHS S&T does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods.**

Not Applicable.