

1 Supporting Statement for Paperwork Reduction Act Submission

NECP Goal 2 Performance Report

OMB Control Number: 1670-NEW

Instrument: State Name - National Emergency Communications Report - Goal 2 Performance Report.

October 2010

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.

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.**

The Department of Homeland Security (DHS) Office of Emergency Communications (OEC), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 101 et seq., is required to develop the National Emergency Communications Plan (NECP), which was to include identification of goals, timeframes, and appropriate measures to achieve interoperable communications capabilities. OEC is responsible for conducting regular assessments of and reporting to Congress on the state of interoperable emergency communications nationwide, including:

- A determination of the degree to which interoperable emergency communications capabilities have been attained to date and the gaps that remain for interoperability to be achieved;
- An evaluation of the ability to continue to communicate and to provide and maintain interoperable emergency communications by emergency managers, emergency response providers, and relevant government officials

Per these legislative mandates, OEC will report to Congress on key findings from this collection effort. OEC does not plan to publicly release individual jurisdiction/State results publicly. The NECP Performance Report is designed to meet these statutory requirements of Goal 2: By 2011, 75 percent of non-Urban Areas Security Initiative (UASI) jurisdictions are able to demonstrate response-level emergency communications within one hour for routine events involving multiple jurisdictions and agencies.

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.

OEC will use the information gained through the reports to track progress that States are making in implementing milestones and demonstrating goals of the NECP, as required through the Homeland Security Act of 2002, 6 U.S.C 573 SEC 1803. Information regarding demonstration of Goal 2 of the NECP will measure the ability of counties or county-equivalents to demonstrate response-level emergency communications within one hour for routine events involving multiple jurisdictions. The data collected will be used to assess the one-time demonstration of NECP Goal 2 based on after action reports.

Statewide Interoperability Coordinators (SWICs) or Statewide Communications Interoperability Planning (SCIP) points of contact (police, fire, EMS, emergency managers, dispatchers, radio operators, government workers, etc.) will be responsible for collecting this information from their respective counties or county-equivalents within their State. SWICs will complete and submit the report directly to OEC through unclassified electronic submission. All information gathered will be maintained in OEC files. These questions represent critical indicators for jurisdiction to achieve interoperability communications during an incident, planned event, or real world event.

OEC believes that this collection will generate benefits for the States, including a better understanding of the level of interoperability across their State, and will offer to work with the States on how to leverage their State-specific results. Further, in States where counties do not respond, OEC coordinate with those States on an individual outreach strategy to increase participation.

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 collection of information is electronic. Respondents will receive the instrument through an email from OEC. Final reports will be sent to NPPD OEC via email at NECPgoals@hq.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.

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 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 OEC does not collect this information it will not be able to carry out key statutory responsibilities of the office— identifying States' progress in implementing goals and milestones of the National Emergency Communications Plan, as mandated under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 101 et seq.

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 secrets, 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 date 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 in response to the PRA statement associated with the collection over the past three years] 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 NECP Performance Report is a newly proposed form. The two comment periods for the proposal will last 60 days and 30 days respectively. OEC will consider all public comments that it receives on the proposed rule, including comments on the information collection aspects of the proposed rule, during the comment period.

60 Day Federal Register Notice: 14 January 2011 (Volume 76, Number 10), Page 2700.
There were 0 comments received.

30 Day Federal Register Notice: 20 April 2011 (Volume 76, Number 76), Page 22115-22116.
There were 0 comments received.

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

There is no offer of monetary or material value for this information collection.

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

No assurance of confidentiality is provided to respondents. However, per the Implementing Recommendations of the 9/11 Commission Act of 2007 (6 U.S.C 579(m)), the OEC Director may make redactions that are determined to be necessary to protect classified or other sensitive information. OEC does not anticipate that classified or other sensitive information will be provided through this information collection. Further, information protected by the Privacy Act of 1974 will be kept private to the extent allowable by law.

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.

There are no questions of 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.**

OEC estimates that designated SWICs and SCIP points of contact will complete the reports and collect information regarding Goal 2 of the NECP from each county or county-equivalent points of contact (police, fire, EMS, emergency managers, dispatchers, radio operators, government workers, etc.) within their State. The total time required for the SWIC or SCIP point of contact to complete the NECP Performance Report amounts to 30hours, including clerical time. For an estimated 56 responder per hour, the burden is 1680 (30hrs x 56 respondents) hours. At a rate of \$24.42 per hour¹, the dollar value of the total annual burden hours associated with the existing elements of this information collection equals \$41,025.60.

Instrument	Respondents	# of Respondents	Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage(in dollars)	Total Annual Burden (in dollars)
NECP Performance Report	Statewide Interoperability Coordinators or SCIP points of contact	56	1	30	1680	\$24.42	\$41,025.60

13. Provide an estimate of the total annual [non-hour] 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-**

¹ This hourly rate is an average hourly wage calculation based on Bureau of Labor Statistics (BLS) from May 2008 for numerous occupations of persons who attend OEC events, including the following: Medical and Health Services Managers; Emergency Management Specialists; Network and Computer Systems Administrators; Network Systems and Data Communications Analysts; Electrical and Electronic Engineering Technicians; Emergency Medical Technicians and Paramedics; First-Line Supervisors/Managers of Police and Detectives; First-Line Supervisors/Managers of Police and Detectives; First-Line Supervisors/Managers of Fire Fighting and Prevention Workers; First-Line Supervisors/Managers; Protective Service Workers (All Other); Fire Fighters; Police and Sheriff's Patrol Officers; Sales Representatives (Wholesale and Manufacturing, Technical and Scientific Products); Communications Equipment Operators (All Other); Reservation and Transportation Ticket Agents and Travel Clerks; Police, Fire, and Ambulance Dispatchers; Dispatchers (Except Police, Fire, and Ambulance); Legal Secretaries; Medical Secretaries; Secretaries (except Legal, Medical, and Executive); First-Line Supervisors/Managers (of Mechanics, Installers, and Repairers); Radio Mechanics; Telecommunications Equipment Installers and Repairers (except Line Installers); US Government Employee (GS-13, Step 5, averaged across locality and CONUS).

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 [including filing fees paid]. 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 is no submission or filing fee associated with this collection. As all forms are completed and sent via email to the NECP Goals Inbox at NECPgoals@hq.dhs.gov. There is no associated printing or mailing costs.

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.

Based on internal review, OEC personnel estimate that it takes approximately 4 hours to review NECP Performance Reports. An average base salary of \$104.07/hour for contract support staff and Program Analysts Grade 13 step 5 was used for these calculations.

56 NECP Performance Report x 4 hours/per report= 224 hours

224 hours x \$104.07 = \$ 23,311.68

Total Cost to the Government = \$23,311.68

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

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.

All States and territories have until September 30, 2011 to submit their reports. Because OEC has deemed the information collection as sensitive national security information, it will not release individual State data or publish a report for statistical or other purposes that compares the progress of one or more States with any other State in implementing the NECP.

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.

OEC 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 Submissions," of OMB Form 83-I.

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