

## Supporting Statement for Paperwork Reduction Act Submissions

### Title: Statewide Communication Interoperability Plan (SCIP) Template and Annual Progress Report

OMB Control Number: 1670-0017

#### Supporting Statement A

##### 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, National Protection and Programs Directorate, Office of Cybersecurity and Communications, Office of Emergency Communications (OEC), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 571 et seq., is required, pursuant to 6 U.S.C. § 572, to develop the National Emergency Communications Plan (NECP), which includes identification of goals, timeframes, and appropriate measures to achieve interoperable communications capabilities. The Statewide Communication Interoperability Plan (SCIP) Template and Annual Progress Report are designed to meet and support these statutory requirements and will replace the SCIP Implementation Report, which was cleared in 2010 in accordance with the Paperwork Reduction Act of 1995.

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 from the SCIP Template and Annual Progress Report to track the progress 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. § 572. The SCIP Template and Annual Progress Report will provide OEC with broader capability data across the lanes of the Interoperability Continuum, which are key indicators of consistent success in response-level communications.

In addition, the SCIP Template and the Annual Progress Report will assist states in their strategic planning for interoperable and emergency communications while demonstrating each state's achievements and challenges in accomplishing optimal interoperability for emergency responders. Moreover, certain government grants may require states to update their SCIP Templates and Annual Progress Reports to include broadband efforts in order to receive funding for interoperable and emergency communications.

Statewide Interoperability Coordinators (SWICs) will be responsible for collecting this information from their respective stakeholders and governance bodies, and will complete and submit the reports directly to OEC through unclassified electronic submission.

In 2010, OEC submitted the SCIP Implementation Report for review and clearance in accordance with the Paperwork Reduction Act of 1995. The SCIP Implementation Report was approved in 2010. The SCIP Template and Annual Progress Report will replace the SCIP Implementation Report and will streamline the information collected by OEC as well as simplify reporting measures for each state's SWIC.

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 SCIP Template and Annual Progress Report may be submitted through unclassified electronic submission to OEC by each state's SWIC. In addition to being able to submit their respective SCIP Template and Annual Progress Report via email to [oece@hq.dhs.gov](mailto:oece@hq.dhs.gov), states will have the option of completing and submitting their reports via an online tool that is currently under development.

There is no change to the information being collected. The only proposed change to the collection is that an online option is being added. States will be able to log in to the SCIP online tool and complete and submit their respective SCIP Template and Annual Progress Report directly through the online tool portal. The SCIP online tool will mirror both the SCIP Template and Annual Progress Report in terms of output and is designed to shorten and facilitate reporting efforts for each state's SWIC by streamlining the information collected.

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 other form and, therefore, is not duplicated elsewhere. The SCIP Template and Annual Progress Report will replace the SCIP Implementation Report which was cleared in accordance with the Paperwork Reduction Act in 2010 and will expire in September of 2013.

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.

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

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 OEC does not collect this information it will not be able to carry out its key statutory responsibilities, which include identifying states' progress in implementing goals and milestones of interoperable emergency communications as outlined in the NECP.

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.
- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.
- (c) Requiring respondents 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.
- (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.
- (f) Requiring the use of a statistical data classification 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.
- (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.

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

The SCIP Template and Annual Progress Report are newly proposed reports that will replace the SCIP Implementation Report, which was cleared in accordance to the Paperwork Reduction Act in 2010. The two comment periods for the proposal lasted 60 days and 30 days respectively.

OEC considered all public comments received on the proposed rule, including comments on the information collection aspects of the proposed rule, during the comment period.

	<b>Date of Publication</b>	<b>Volume Number</b>	<b>Number</b>	<b>Page Number</b>	<b>Comments Addressed</b>
<i>60-Day Federal Register Notice:</i>	August 16, 2013	78	159	50075	1
<i>30-Day Federal Register Notice</i>	April 15, 2014	79	72	21253	1

OEC received one comment during the 60-Day comment period, which was deemed a non-comment and no response was necessary.

During the 30-day comment period, OEC received one comment, which was an endorsement from a Deputy Sherriff from the State of Georgia. OEC responded to this comment, by thanking the Deputy Sherriff for submitting comments regarding the changes to the Statewide Communications Interoperability Plan Template and Annual Progress Report, as well as the additional information provided regarding the Georgia Interoperability Network (GIN) functions and capabilities.

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.

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. However, OEC makes no assurances of confidentiality.

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 a sensitive nature.

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.

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.

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.

OEC estimates the total time required for each state’s SWIC to complete the SCIP Template and the Annual Progress Report amounts to 10 hours, including clerical time. Since OEC will conduct annual SCIP Template revision workshops to assist states with the drafting of their new SCIP, only three burden hours will be dedicated to completing the SCIP Template and seven burden hours will be dedicated to completing the Annual Progress Report.

There is one SWIC per state or territory; therefore there are 56 SWICs within the United States and territories. To determine the burden hour cost for the SCIP Template, OEC multiplied the total number of respondents (56 SWICs) by three burden hours resulting in 168 total annual burden hours. At a rate of \$51.64 per hour, which is an average hourly wage calculation based on the Bureau of Labor Statistics (BLS) from February 2013 for a state-level management occupation, multiplied by 168 total annual burden hours, the dollar value associated with the existing elements of the SCIP Template equals \$8,675.52.

To determine the annual burden hour cost for the Annual Progress Report, OEC multiplied the total number of respondents (56 SWICs) by seven burden hours resulting in 392 total annual burden hours. At a rate of \$51.64 per hour, which is an average hourly wage calculation based on the BLS from February 2013 for a state-level management occupation, multiplied by 392 total annual burden hours, the dollar value associated with the existing elements of the Annual Progress Report equals \$20,242.88.

Adding the SCIP Template’s total annual respondent cost to the Annual Progress Report’s total annual respondent cost equals \$28,918.40.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Report Name	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
States and territories’ SWICs	SCIP Template	56	1	3	168	\$51.64	\$8,675.52

States and territories' SWICs	Annual Progress Report	56	1	7	392	\$51.64	\$20,242.88
Totals		56	1	10	560	\$51.64	\$28,918.40

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: (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 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 to 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 reports are completed via email or online, 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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Based on internal review, OEC personnel estimate it takes approximately four hours to review each state's revised SCIP Template and Annual Progress Report. An average base salary of

\$104.07 an hour for contract support staff and Program Analysts Grade 13 step 5 was used for these calculations. This hourly wage rate was determined by calculating the average hourly rate of contract support staff working within OEC and the hourly rate for Program Analysts Grade 13 Step 5 according to the Office of Personnel and Management, then multiplying the hourly wage rate by the total annual burden hours resulting in the total annual cost.

Cost Category	Report Name	Hours for Design/ Administration	Hours per Report	Number of Reports	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
Total Capital and Start-Up Cost	SCIP Template	0	0	0	0	0	\$0
Total Operation and Maintenance Cost	SCIP Template	0	1	56	56	\$104.07	\$5,827.92
Total Capital and Start-Up Cost	Annual Progress Report	0	0	0	0	\$0	\$0
Total Operation and Maintenance Cost	Annual Progress Report	0	3	56	168	\$104.07	\$17,483.76
Total		0	4	56	224	\$104.07	\$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. 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.

In addition to being able to submit their respective SCIP Template and Annual Progress Report via email to oec@hq.dhs.gov, states will have the option of completing and submitting their reports via an online tool. There is no change to the information being collected. The only proposed change to the collection is that an online option is being added. There has been no increase or decrease in the estimated

annual burden hours and cost previously reported for this information collection to the Federal Government; however, there has been an increase in annualized cost to respondents of the information collection for the burden hours. The previously approved SCIP Implementation Report used an average hourly wage calculation of \$24.42 based on the BLS from 2008 for numerous occupations of personnel who attend OEC events, such as local first responders who previously were responsible for completing the SCIP Implementation Reports. The SCIP Template and Annual Progress Report will be completed by each state's SWIC and therefore, the current information collection uses an average hourly wage calculation of \$51.64 based on the BLS from 2013 for a state-level management occupation, which is the occupation category assumed to be best aligned to a SWIC. Taking the hourly wage calculation of \$51.64 and multiplying it by 560 (10 burden hours times 56 SWICs) produces a total annual burden cost of \$28,918.40.

Respondents are assisted with completion and submission of the SCIP Template and Annual Progress Report.

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, 2014, to submit their SCIP Templates and Annual Progress Reports. The results of the information collection for individual States will be publicly available; however 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. Instead, OEC will develop an aggregate report that presents a national perspective on state achievements in implementing interoperable emergency communications. The national summary report will also identify gaps in capabilities that have evolved or remain unchanged as a result of the implementation.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain 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.