

**SUPPORTING STATEMENT FOR
REGIONAL EQUIPMENT AND CAPABILITIES EXCHANGE
OMB Control No.: 1601-NEW
COLLECTION INSTRUMENT(S): Phone, electronic and written questionnaire, email**

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 Joint Analysis Center (JAC), of the Operation Support Division, is responsible for providing awareness of the Global Nuclear Detection Architecture (GNDA), and functions as a central point of the GNDA providing awareness of nuclear threats to the Domestic Nuclear Detection Office (DNDO). The JAC plans to implement a Regional Equipment and Capabilities Exchange (RECE) to identify and compare existing information referencing the domestic nuclear radiological detection capabilities of all participating stakeholders.

The circumstances that make the RECE necessary is the need for a database that accurately reflects the current R/N detection capabilities federal, state, tribal, territorial, and local (FSTTL) stakeholders.

The RECE will recognize a standard process and procedure that the JAC facilitates to ensure a collaborative and coordinated data collection methodology is followed for fidelity of information. The successful implementation of the RECE will aid DNDO in achieving specific objectives mandated in National Security Presidential Directive (NSPD)-43/Homeland Security Presidential Directive (HSPD)-14, and codified in Title 6, United States Code (USC) § 592. Attached is the HSPD14/NSPD43, please reference the following sections within NSPD-43 / HSPD-14:

Subject: Domestic Nuclear Detection

(1) (b) Continue to enhance the effective integration of nuclear and radiological detection capabilities across Federal, State, local, and tribal governments and the private sector for a managed, coordinated response;

(2) (b) Enhance and coordinate the nuclear detection efforts of Federal, State, local, and tribal governments and the private sector to ensure a managed, coordinated response;

(2) (f) Support and enhance the effective sharing and use of appropriate information generated by the intelligence community, law enforcement agencies, counterterrorism community, other government agencies, and foreign governments, as well as provide appropriate information to these entities; and

DNDO needs the information to be collected by the RECE to enhance and coordinate the rad/nuc detection efforts of Federal, State, local and tribal governments, and to effectively share the resources information with all interested entities.

Although not legal justification to collect information, the 2010 GNDA Strategic Plan goals are provided as additional information that serves as examples for how this collection effort supports internal DNDO initiatives.

The RECE directly relates to the following specific goals within the 2010 GNDA Strategic Plan:

Goal 3: Communicate – Exchange relevant data, by receiving information from and disseminating information to relevant authorities and the general public, as appropriate.

Goal 4: Coordinate – Ensure that stakeholders with GNDA functions minimize gaps and unintended overlaps in roles and responsibilities, including through collaboration and cooperation.

Additionally, the RECE helps DNDO meet DHS’ lead and supporting roles in the following 2010 GNDA Strategic Plan Objectives:

Objective 4: Assist state, local, and tribal governments in detecting and reporting on any unauthorized nuclear and radiological materials within their jurisdictions.

Objective 5: Develop or enhance the federal interior detection architectures and strategies.

Objective 7: Receive information from, and disseminate information to relevant authorities and the general public.

Objective 8: Ensure that Stakeholders with GNDA functions minimize gaps and unnecessary overlaps in roles, responsibilities, and activities.

Objective 9: Ensure that the GNDA can adapt and react in response to changes in technology, protocols, and adversary capabilities.

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.

Information collected is the type used in the ordinary course of business (official business Points of Contact; names, addresses, emails, office phone number to call.) The purpose of the RECE form (DHS Form 10089) is to collect and warehouse relevant data for federal, state, tribal, territorial, and local (FSTTL) authorities to minimize gaps and unintended overlaps in roles and responsibilities for radiological or nuclear (R/N) detection capabilities. The primary purpose of the RECE Questionnaire form is to collect data on current stakeholder (primarily directed at state and local) radiological or nuclear (R/N) detection equipment inventories and resources to streamline access to a real-time depiction of R/N detection capabilities and serve as a warehouse for the data. Data collected will be available via the Joint Analysis Center Collaborative Information System (JACCIS). The Adobe Active “fillable” form focuses on the specific information regarding the respective R/N detection program plans, assets, and status of equipment. As part of the overall mission of the JAC, the RECE presents an opportunity to extend access to stakeholders with a RND mission, program, or equipment but not reflected in an accessible database

The JAC aims to provide assistance to State or Local entities with limited access to resources as

part of the RECE, and establish a standing collection strategy. Information can be submitted through use of a questionnaire (hard/soft copy transmittal), or scripted phone interviews. The questionnaire will be distributed in compatible file format Adobe PDF Fill-able Form. All emails and phone interviews will not deviate from the scope or content of the DHS Form 10089. Phone interviews will be conducted on an as needed basis for the purposes of non-submittals or to address questions related to answers of information provided within the form.

All data submitted will be processed and stored in a Microsoft Excel spreadsheet for review prior to Joint Analysis Center Collaborative Information System (JACCIS) integration. The RECE will help to accurately reflect the current domestic radiological and detection capabilities within JACCIS. The JACCIS Dashboard provides a secure web interface to collaborate with mission partners and includes a GIS that allows users to view detection information, detectors, situational awareness reports, and other overlays (critical infrastructure, etc.) in a geospatial viewer. Web Service interfaces to other mission partner's systems and content routers provide linkages to detection assets around the country in real-time.

The information collected will be used to provide a more accurate or real-time depiction of the GNDA.

- 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.**

Information can be submitted through use of a questionnaire (hard/soft copy transmittal), email DNDO.JAC2@HQ.DHS.GOV or phone interviews 1-877-363-6522. Use of these three methods of information submittals provides flexibility to the targeted collection audience which may have limited access to technological collection. All data submitted will be processed and stored in an excel spreadsheet, saved in a designated folder within a non-public DHS network share drive folder. Following review of spreadsheet information, data will be integrated into JACCIS in accordance with agreed distribution or sharing regulations; each questionnaire participant will be encouraged to acquire a JACCIS account, and point of contact information for JACCIS account acquisition are included within DHS Form 10089 RECE Questionnaire Directives.

- 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.**

Information already available cannot be used or modified for use because it extremely dated, and lacks the specificity required for accurate accountability. To provide real-time depiction of the GNDA, there needs to be accountability of current resources available at all levels. RND equipment varies greatly between States, Territories and Local jurisdictions, and it is often not controlled or regulated by a single entity.

Efforts to identify duplication have included coordination with Federal stakeholders such as FEMA, CBP, and the FBI; each engagement revealed none of these agencies were in possession of a comprehensive complete data source which included specific domestic (United States) R/N detection capabilities for all States, Territories or Local jurisdictions.

In 2007 and 2009 COL Brent Bredehoft Deputy Assistant Director (in 2007/2009) of the Joint Analysis Center (JAC) directed his staff to conduct an informal information data call to federal entities only. In 2007 State and Local data was collected by the FBI (2006/2007) and provided to the JAC. Neither data collection was for JACCIS, but a plan was developed to put data collected in JACCIS after receiving. This information was neither consistent nor comprehensive and largely inaccurate since much of the information was haphazardly compiled with limited distribution. Additionally the FBI has not updated or made available a revised version of the 2006/2007 data call.

Additionally the RECE is organizing and analyzing relevant data from domestic Preventative Radiological Nuclear Detection (PRND) reports, specifically the National Capabilities Effort (NCE), but many of these NCE reports are extremely dated (greater than 5 years old), do not provide definitive identification details regarding equipment, therefore there is no way to de-conflict with existing equipment data. The NCE reports were a contracted effort through Defense Threat Reduction Agency (DTRA), and due to proprietary limitations when distributed to DNDO were not accompanied by the related raw data collection. Additionally, the NCE reports were created through informal collection techniques, and are largely inconsistent.

Lastly, in the years since the NCE reports and JACCIS informal data calls many States, Territories and Local jurisdictions have made significant advancements and or efforts towards acquiring R/N detection capability. With that said, State, Territories and Local jurisdictions are not subjected to any standing reporting requirement regarding R/N detection equipment or capabilities, which precludes DNDO or any other Federal Agency from providing a real-time and accurate accountability to decision-makers regarding available domestic R/N detection assets.

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 collection of information will not impact small businesses or 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.

Furnishing this information is voluntary; however, failure to furnish the requested information may prevent the completion of R/N detection equipment inventories, impede capabilities assessments and ability to identify R/N detection vulnerabilities. Without access to a database of this information federal decision makers could be significantly hindered when attempting to allocate resources during a GNDA related threat incident.

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 questionnaire, 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.**

There are no special circumstances that would cause any of the above mentioned situations.

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.**

A 60 Day Federal Register Notice soliciting for public comments was published on Tuesday, July 1, 2014 at 79 FR 37337. No comments were received.

A 30 Day Federal Register Notice soliciting for public comments was published on Wednesday,

October 22, 2014 at 79 FR 63139. No comments were received.

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

There is no payment of gift offered to respondents for the collection of information.

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

Authority associated with this collection: Title XIX of the Homeland Security Act of 2002, Section 1902(a)(2), codified at 6 U.S.C. 592(a)(2).

Purpose: The U.S. Department of Homeland Security (DHS), Domestic Nuclear Detection Office (DNDO) has responsibility to “enhance and coordinate the nuclear detection efforts of federal, state, local, and tribal governments and the private sector to ensure a managed, coordinated response.” The Regional Equipment and Capabilities Exchange (RECE) seeks to collect and exchange relevant data with federal, state, tribal, territorial, and local (FSTTL) authorities to minimize gaps and unintended overlaps in roles and responsibilities for radiological or nuclear (R/N) detection capabilities. RECE is collecting contact information in order to distribute it to necessary points of contact (POCs), and to perform various administrative tasks. DHS will use this information to provide authorized individuals access to or interaction with the Joint Analysis Center Collaborative Information System (JACCIS).

Routine Uses: In general, DHS will use this information to distribute contact information to relevant POCs, provide authorized individuals access to JACCIS, and perform various administrative tasks. DHS may share this information on a case-by-case basis as required by law, or necessary for a specific purpose as described in the DHS/ALL – 002 Department of Homeland Security General Mailing Lists and Other Lists System of Records Notice (73 FR 71659), which is available online at www.dhs.gov/privacy.

Disclosure: There is no assurance of confidentiality provided to respondents. There will be no collection of trade secret or business proprietary information. Furnishing this information is voluntary; however, failure to furnish the requested information may prevent a user from contributing radiological or nuclear detection information to RECE. This could cause a hindrance when attempting to allocate resources during a global nuclear detection architecture related threat incident.

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 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 questionnaires 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**

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total Annual No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
S/L/T/T official (Fire, police, HAZMAT)	RECE Questionnaire .pdf	3	1	3	1	3	\$27.78	\$27.78
Federal and Contract	RECE Questionnaire .pdf	15	1	15	1	15	\$58.15	\$872.25

or support								
S/L Working Group Participants	RECE Questionnaire .pdf	84	1	84	1	84	\$30.00	\$2520.00
Total		102		102		102		\$3420.03

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 costs imposed on the respondents for compliance with this collection of information.

- 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.**

The cost to the Federal Government would involve the time of 2x partial Federal Employees amounting to approximately 5% of a GS-15's salary (5% X \$140000 = \$7000) and 15% of a GS-13's salary (15% X \$100000 = \$15000). Additionally time will include participation of up to 2x SETA government contractors equating to 50% of average salary of the designated SETA contractor (\$95000 X 2 = \$190000 * 50% = 95000). The total cost to the federal government will be \$117,000.00

Other occupational expenses, such as equipment, overhead, and support staff expenses, would have occurred without this collection of information requirements and are considered normal operating expenses.

- 15. Explain the reasons for any program changes or adjustments reporting 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.**

Data remains OUO/LES and is not published.

- 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.**

DHS is not seeking an approval to display the expiration date. The expiration date, upon approval, will be displayed.

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

NOT APPLICABLE