Supporting Statement for Paperwork Reduction Act Submissions

Title: Technical Assistance Request and Evaluation

OMB Control Number: 1670-0023

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 Office of Emergency Communications (OEC), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 571 et seq., as amended, provides emergency communications-related technical assistance at no charge to State, regional, local, and tribal government officials. To receive this technical assistance, stakeholders must submit a request form identifying their priorities. In order for OEC to assess the value of the services it provides through technical assistance, an evaluation form is also requested of those receiving technical assistance.

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 uses the Technical Assistance Request Form to identify the number and type of technical assistance services needed by the State, territory, local, and tribal agencies. This information enables OEC to plan and align resources accordingly. OEC considers each request based on the priority indicated by the State, as well as the anticipated impact of the service offering on the implementation of the Statewide Communications Interoperability Plan (SCIP) and the applicability to National Emergency Communications Plan (NECP). The evaluation form is completed by stakeholders at the completion of OEC technical assistance services and enables OEC to assess the quality of technical assistance services provided and in a holistic fashion measure the value of the services. The information collected through these evaluations is used by OEC for continued improvement planning. The following forms are completed by State, territory, local, and/or tribal government employees and collected through unclassified electronic or manual submission:

<u>DHS Form 9043 – Technical Assistance Request Form</u>

OEC uses the Technical Assistance Request Form (DHS Form 9043) to collate requests for technical assistance and evaluate the impact of requests on the attainment of the NECP goals, objectives, and initiatives. These request forms are completed by statewide interoperability coordinators or their designees at the start of the technical assistance review cycle, and on an as needed basis when out-of-cycle.

DHS Form 9042 – Technical Assistance Evaluation Form

OEC uses the Technical Assistance Evaluation Form (DHS Form 9042) to conduct a review of the effectiveness and adequacy of technical assistance services provided to State and local officials for interoperable and operable communications. These evaluation forms are submitted by the TA point of contact for the event at the completion of technical assistance services.

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.

Approximately 95 percent of request and evaluation forms are submitted electronically by logging into the portal at http://www.publicsafetytools.info, and selecting TA/SCIP Catalog in the green section on the lower left hand corner of the screen. From there, users are able to select the appropriate form, ether the Technical Assistance (TA) Requests (DHS Form 9043) and/or the TA Evaluation forms (DHS Form 9042) to complete for submission. In the event that a paper form is needed, users may compete the forms and email to TAevaluations@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 specific to the OEC Technical Assistance program and as such is not otherwise collected in any form and 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.

This information collection does not impact 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 effectively carry out a key statutory responsibility of the office, which is to provide technical assistance services to State, regional, local, and tribal government officials. In addition, without this collection, 6 U.S.C.§ 571(c)(6). OEC will be unable to gather sufficient information for quality assurance or quality improvement purposes.

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.

	Date of Publication	**Volume #**	**Number #**	**Page #**	**Comments Addressed**
60Day Federal Register Notice:	December 10, 2014	79	237	73328	0
30-Day Federal Register Notice	July 2, 2015	80	127	38222	0
30-Day Federal Register Notice (Corrected)	July 29, 2015	80	145	45226	0

OEC received no comments from outside agencies regarding these forms. During the past 3 years we have not received any inquiries from outside agencies regarding this information collected and since the information is inherent to the OEC technical assistance process, we know of no relevant outside consultation sources. OEC will again solicit comments from outside sources during this renewal process and is prepared to respond to their concerns

OEC conducts two working sessions each year with representatives from State, regional, local, and tribal government to discuss the technical assistance program, to include the process and content of the technical assistance request and evaluation forms.

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.

While there are no assurances of confidentiality, information is protected by the Privacy Act of 1974 and is kept private or anonymous to the extent allowable by law.

The currently adjudicated National Protection and Programs Directorate (NPPD), Office of Cyber Security & Communications (CS&C), Office of Emergency Communications (OEC) National Emergency Communications Plan (NECP) Privacy Threshold Analysis (PTA). This PTA introduces the Communication Assets Survey and Mapping (CASM) tool, and updates and replace previously adjudicated PTAs for the NECP Statewide Communications Interoperability Plan (SCIP); Communications Unit Leader (COML); and the OEC Technical Assistance Request and Evaluation (TARE), and rolls their activities up under the larger NECP.

Because the activities include the collection of contact information of emergency response personnel at all levels of government, and across disciplines, DHS has adjudicated this PTA to be considered privacy sensitive and requires a Privacy Impact Assessment (PIA) and System of Records Notices (SORN) coverage. A new PIA and SORNs are NOT required and the NECP activities can be covered by the existing DHS-Wide General Contacts List PIA and DHS/ALL-002 - Department of Homeland Security (DHS) Mailing and Other Lists System (SORN), and DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) SORN.

The forms included in this adjudication, include the fillable electronic copies of the Technical Assistance forms discussed in this PTA which are available on line at: www.publicsafetytools.info.

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:
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 that stakeholders (police, fire, EMS, emergency managers, dispatchers, radio operators, government workers, etc.) will request and evaluate technical assistance services. Based on discussions with stakeholders the total time required to complete the Technical Assistance Request Form and Technical Assistance Evaluation Form amounts to 25 minutes for each form, including clerical time. Therefore, the total annual burden associated with the proposed elements of this collection is 51 minutes. For an estimated 2,056 respondents, the burden is 863.52 hours. At a rate of $28.95 per hour[1], the dollar value of the total annual burden hours associated with the existing elements of this information collection equals $24,998.90.

[1] This hourly rate is an average hourly wage calculation based on Bureau of Labor Statistics (BLS) from 2012 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).

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
State & Local Officials	Technical Assistance Request Form	56	1	.42 hours (25 minutes)	23.52	28.95	680.90
Trainees	Technical Assistance Evaluation Form	2000	1	.42 hours (25 minutes)	840	28.95	24,318.00
Total		2,056	1	.84 hours (50 Minutes)	863.52	28.95	24,998.90

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 applying to participate in OEC events. As all forms are completed via email or in person, 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.

Cost Category	Form Name	Hours for Design/ Administration	Hours per Report	# of Reports	Total Annual Burden (Hours)	Aver-age Hourly Wage Rate	Total Annual Cost
	Technical Assistance Request Form	Renewal	.16	56	9	56.01*	504.09
	Technical Assistance Evaluation Form	Renewal	.16	2,000	320	56.01*	17,923.20
Total				2056	329	56.01*	18,427.29

* GS 13/10 in DC Area as of 2014

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.

There have been no changes in the annual burden hours since our previous submission; however, there has been a 1.0 % increase in the estimated annual cost burden to the Federal Government (Item 14) due to the increases in Federal salaries during the past three years.

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 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.