SUPPORTING STATEMENT
U.S. Department of Commerce
National Telecommunications and Information Administration
Community Connectivity Initiative
Self-Assessment Tool
OMB Control No. XX

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The National Telecommunications and Information Administration (NTIA) launched BroadbandUSA in January 2015 in response to demand from communities that realized broadband access and use are vital to their economic development, innovation, education, and healthcare needs. BroadbandUSA provides technical assistance, guidance, and resources to communities across the country that want to expand their broadband capacity and promote broadband adoption. BroadbandUSA brings stakeholders together to solve problems, contribute to emerging policies, link communities to other federal agencies and funding sources, and address barriers to collaboration across agencies.

In March 2015, President Obama created the Broadband Opportunity Council (Council), an interagency collaboration among 25 federal agencies co-chaired by the Departments of Commerce and Agriculture, to determine what actions the federal government could take to eliminate regulatory barriers to broadband deployment and to encourage investment in broadband networks and services.[1] The Community Connectivity Initiative is one of NTIA's commitments outlined in the Council's report released in September 2015.[2]

The purpose of the Community Connectivity Initiative is to support communities with tools and resources to attract broadband investment and promote meaningful use. NTIA and the National Economic Council conducted outreach to more than 200 stakeholders and communities to seek input on the implementation of the Community Connectivity Initiative. The initial findings of that outreach resulted in collaborators and communities assisting in the creation of the framework for the community connectivity self-assessment tool.

The questions developed for the community connectivity self-assessment tool reflect extensive input from stakeholders in communities, businesses, and nonprofits across America. Throughout 2016, NTIA conducted more than 20 webinars and workshops where individuals and groups served as collaborators in shaping the Community Connectivity framework, assessment, and online tool. That stakeholder input is the foundation of Community Connectivity Initiative.

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[1] The White House, Office of the Press Secretary, *Presidential Memorandum – Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training* (May 23, 2015), available at https://www.whitehouse.gov/the-press-office/2015/03/23/presidential-memorandum-expanding-broadband-deployment-and-adoption-addr.

[2] *Id*. at 19. The report tasked NTIA, in collaboration with the National Economic Council, to "convene stakeholders to design and launch a community connectivity index."

The objectives of the Community Connectivity Initiative are to: (1) support communities as they convene, assess, and act to promote local priorities and advance broadband access, adoption, policies, and use; and (2) increase the number of communities actively assessing connectivity impacts and investing to improve broadband outcomes. The Community Connectivity Initiative includes three resources for communities, including the community connectivity framework, an online self-assessment tool, and resources that support local planning and action. The community connectivity framework provides a structure to engage local stakeholders in conversations about broadband access and community priorities. The online self-assessment tool will provide local leaders with a framework for assessing broadband needs in their communities. The tool will enable them to record the findings and integrate the assessments with national datasets on community broadband. Upon completion of the self-assessment tool, communities will receive a report that combines input from the self-assessment tool with other data sources, along with resources that they could use to improve their broadband capabilities.

The proposed information collection would be voluntary for state, local, and tribal governments. The tool would ask communities to answer questions regarding broadband access and assets (Access), digital inclusion and skills (Adoption), and community issues (Community). NTIA will use the information collected through the online assessment tool to support communities working to accelerate broadband deployment, deepen broadband adoption, strengthen local policies, and use broadband to advance local priorities. Through this effort, the Community Connectivity Initiative will produce improved broadband planning assets for communities, thereby increasing the number of communities actively investing to improve broadband access and digital inclusion.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The specific information covered by this information collection package consists of the community connectivity self-assessment tool, its framework, and questions.

The community connectivity self-assessment tool collects input across three major categories: access, adoption, and community.

The access category includes four elements: broadband access, mobile access, provider engagement, and public assets. The adoption category includes adoption and use, digital inclusion, digital skills, and devices. The community category contains the following four sub-categories: leadership, community priorities, stakeholder engagement, and policy environment.

Each of the sub-categories is represented in the community connectivity self-assessment tool as separate modules. Each module consists of a series of questions related to the sub-category.

The primary purpose of the tool is to support local broadband planning efforts. We anticipate that communities will complete the community connectivity self-assessment tool, build a local plan, and reassess their planning efforts based on their local needs and goals. Through this tool, the Community Connectivity Initiative will produce improved broadband planning assets for

communities, thereby increasing the number of communities actively investing to improve broadband access and digital inclusion.

NTIA is not planning to disseminate the information collected but may later disseminate an analysis of the aggregate information collected in order to inform policies and research related to broadband access, adoption, and use. When NTIA decides to disseminate the information, it will comply with all applicable Information Quality Guidelines.

NTIA will maintain the electronic data on an NTIA server. NTIA will maintain the integrity of the electronic data by safeguarding it consistent with acceptable standards of operation. NTIA follows the Federal Information Security Management Act (FISMA) and ensures its systems and data are protected (regarding confidentiality, integrity, and availability). NTIA's Chief Information Officer (CIO) is the Authorizing Official for NTIA. At this time, NTIA's CIO assesses the online tool and data to be collected at a FISMA Low categorization that will have, at a minimum, FISMA Low controls implemented. Prior to implementing the online self-assessment tool, an A&A (Assessment and Authorization) will be completed and NTIA's CIO will sign an authorization to operate (ATO).

3. <u>Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.</u>

The Community Connectivity Initiative self-assessment tool will be an online tool.

4. <u>Describe efforts to identify duplication.</u>

The Community Connectivity Initiative self-assessment tool incorporates data from federal data sources such as the following:

- Federal Communications Commission 477 provider data
- FCC 477 data, summarized to adoption levels by FCC
- U.S. Census Digital Nation Supplement to Current Population Survey with additional Internet questions
- U.S. Census Current Population Estimate
- U.S. Census American Community Survey
- U.S. Census American Community Survey
- U.S. Census Business Survey
- U.S. Census 2010 Survey

In order to eliminate duplication, NTIA designed the tool using existing data from the above-named data sources, which will make it accessible to the users.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize the burden.</u>

The community connectivity self-assessment tool and the collection of information is primarily intended for state, regional, local, and tribal government organizations and their planning teams,

which may include other groups such as non-profit organizations and local businesses. The primary method used to minimize the respondents' burden was to incorporate data from existing data sources. This eliminated the need to ask users additional questions. Participation in this tool is voluntary.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

NTIA designed the community connectivity self-assessment tool based on nearly 18 months of stakeholder engagement, during which stakeholders endorsed the need for such a tool and provided feedback on the framework. Without the tool, communities that lack resources or expertise in broadband planning will be hampered in taking action to improve their broadband capabilities or increase broadband investment. This will disproportionately affect rural communities who have the greatest need for broadband. In addition, NTIA, through Broadband USA, could not effectively support communities working to accelerate broadband deployment, deepen broadband adoption, strengthen local policies, and use broadband to advance local priorities without the use of the tool. The tool allows NTIA to scale its efforts to support the growing need for broadband planning support in communities across America.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

This information collection is consistent with OMB guidelines.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

NTIA published a Federal Register Notice on June 28, 2016 to solicit public comment on the Community Connectivity Initiative self-assessment tool process pursuant to the Paperwork Reduction Act. NTIA did not receive public comments on this published notice.

The questions in the community connectivity self-assessment tool reflect extensive input from stakeholders in communities, businesses, and nonprofits across America. Throughout 2016, NTIA conducted more than 20 webinars and workshops where individuals and groups served as collaborators in shaping the Community Connectivity Initiative framework, online self-assessment tool, and resources. That stakeholder input serves as the foundation of the Community Connectivity Initiative.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

NTIA will not provide gifts or payments to respondents.

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

Although NTIA will not purposely collect sensitive or confidential information through the online self-assessment tool, NTIA will protect any confidential and proprietary information from public disclosure to the fullest extent authorized by applicable law, including the Freedom of Information Act, as amended (5 U.S.C. 552 *et seq.*), the Trade Secrets Act, as amended (18 U.S.C. 1905 *et seq.*), and the Economic Espionage Act of 1996, as amended (18 U.S.C. 1831 *et seq.*).   NTIA will inform users that information collected will be subject to the Freedom of Information Act.

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 collected information does not contain any questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

NTIA estimates a burden of 12 hours per recipient to complete the online self-assessment tool.

> Number of Respondents: 500
> Frequency of Response: Annually
> Total Number of Responses Annually: 500
> Estimated Number of Hours Per Response: 12
> Estimated Total Annual Burden Hours: 6,000

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Other than respondent cost associated with the estimated burden of 6,000 hours (see A.12 above), the total additional annual cost burden to respondents is expected to be negligible. Total capital and start-up costs are insignificant because respondents would not need new technology or capital equipment to prepare responses to the online self-assessment tool. Consequently, NTIA expects the total cost of operating and maintaining the technology and capital equipment to be insignificant. NTIA also expects purchases of services to complete the information collection to be insignificant.

14. Provide estimates of annualized cost to the Federal government.

The community connectivity self-assessment tool is integral to the BroadbandUSA mission and the cost associated with operating and maintaining the tool is a part of the core budget. The cost to the federal government for this information collection will include: (1) NTIA program staffing to provide technical assistance; (2) IT support to include staff, software, hardware, maintenance, and upgrades; and (3) other related expenses. NTIA estimates that the cost to the federal government for operating and maintaining the tool is approximately $200,000 annually.

15. <u>Explain the reasons for any program changes or adjustments.</u>

This is a new collection, and there are no program changes or adjustments.

16. <u>For collections whose results will be published, outline the plans for tabulation and publication.</u>

NTIA is not planning to publish the information collected but may later publish an analysis of the aggregate information collected in order to inform policies and research related to broadband access, adoption, and use.

<u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.</u>

The standard PRA information will be displayed on the online self-assessment tool.

17. <u>Explain each exception to the certification statement.</u>

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection of information will not employ statistical methods.

Attachments:
- 60-Day *Federal Register* Notice