Supporting Statement for Paperwork Reduction Act Submissions

Title: The Department of Homeland Security, Office of Emergency Communications

SAFECOM Nationwide Survey

OMB Control Number: 1670-NEW

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.

Response…
In 2006, Congress passed Public Law 109-295, which created the Office of Emergency Communications (OEC) headed by a Director of Emergency Communications. Responsibilities of the Director include assisting the Secretary in developing and implementing a program to support and promote the ability of emergency response providers and relevant government officials to continue to communicate in the event of natural disasters, acts of terrorism, and other man-made disasters; and ensure, accelerate, and attain interoperable emergency communications nationwide.

6 U.S.C. §571(c)(4) requires the DHS Secretary through the OEC Director to conduct extensive, nationwide outreach to support and promote the ability of emergency response providers and relevant government officials to continue to communicate in the event of natural disasters, acts of terrorism, and other man-made disasters. In order to perform this statutory regulation it is important to understand the variety of technology being used today.

Additionally, 6 U.S.C. § 573 of the United States Code requires the DHS Secretary to conduct a baseline assessment of the first responder emergency communications capabilities at least every five years.

These authorities in addition to DHS's responsibilities through Executive Order 13618 in the area of national security/emergency providers' communications require a renewed examination of baseline emergency communications 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.

Response…

The DHS/NPPD/OEC will conduct the SAFECOM Nationwide Survey, a web-based survey. The purpose of the survey is to gather information to assess available capabilities, identify gaps and needs for emergency response providers to effectively communicate during all types of natural or man-made hazards. The DHS/NPPD/OEC will use the information collected to complete a statutorily mandated assessment and share the data with all stakeholders. In order to ascertain this information, the SNS will deploy four similar surveys across the nation addressing emergency response entities at each level of government: Federal, State and Territorial, Tribal, and local. The SNS is built on a foundation of core elements identified by OEC and its stakeholders as "must haves" in order to achieve open and secure communications operability, interoperability and continuity. These elements are interdependent critical success factors that must be addressed to plan for and implement public safety communications capability. As such, these elements are *Governance, Standard Operating Procedures, Training and Exercises, Technology, Usage and Security*. The survey will encompass questions regarding each major element in order to determine a jurisdiction's level of operability, interoperability and continuity and thus their overall emergency communications capability level. Governance questions will pertain to matters related to leadership, decision making groups, agreements, funding and strategic planning. The element of Standard Operating Procedures will focus on questions related to procedures, doctrine, and practices. Training and Exercises questions will focus on needs, scope, frequency, execution and lessons learned. The Technology element questions are centered on infrastructure, functionality, performance, and redundancy. Usage questions will address frequency of use, end user proficiency, and resource capacity. The last element, Security, will contain question on identification, protection, detection, response, and recovery.

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.

Response…

OEC intends to allow electronic submission to reduce the burden on respondents including web-based surveys and assessment tools i.e. Survey Monkey. Our target audience, first responders, are frequently interrupted and have variable schedules. Electronic submission will ensure the maximum response rate while also permitting respondents to complete the survey at a time of their own choosing. We will also offer two alternative forms. An Adobe PDF-fillable form which can be returned via email to sns@hq.dhs.gov; and a paper copy that will be mailed directly to the respondent(s) requesting a hard copy and returned either via a prepaid enveloped through the U.S. Postal Service to DHS – OEC, ATTN: Ron Hewitt c/o Eric Runnels, 245 Murray Lane, SW, Mailstop 0613, Washington, DC 20598-0613; scanned and emailed to sns@hq.dhs.gov; and/or faxed to DHS – OEC, ATTN: Eric Runnels at (703) 705-6130. We anticipate that .5% of respondents will request a paper version of the survey, which is about 75 surveys.

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.

Response…

There was a predecessor survey completed in 2006 that received PRA approval and was since discontinued. The subject matter of the baseline assessment differs from its previous approved collection because of technological, policy, and governance changes in the field of emergency communications. Thus, new goals, metrics and collection requirements make prior collection tools inadequate for current needs.

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.

Response…

This collection will impact local and tribal responders. Use of electronic submission should assist in minimizing impact of said 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.

Response…

DHS/OEC has a statutory requirement to conduct this collection. Failure to do so will result in non-compliance with the law. The collection of data from the surveys will inform the next iteration of the National Emergency Communications Plan in 2019 which lays the groundwork for emergency communications planning nationwide. The assessment will aid in prioritizing programmatic and funding needs for federal, state, local and tribal public safety agencies.

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.

Response…

a. N/A

b. It is anticipated that respondents will have an excess of a month to complete it.
c. N/A
d. N/A
e. N/A
f. N/A
g. To avoid triggering privacy concerns the survey will be conducted on an anonymous basis. The aggregate data will be available to other agencies upon request.
h. This collection will not require responders to submit proprietary trade secrets and other confidential information.

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.

OEC will work with the SAFECOM organization, with which it has a statutory role; the National Council of Statewide Interoperability Coordinators (NCSWIC), and other relevant stakeholder associations. OEC will utilize regular SAFECOM and NCSWIC meetings, which it hosts, and other available opportunities for this purpose.

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.

OEC will work with the SAFECOM organization, with which it has a statutory role; the National Council of Statewide Interoperability Coordinators (NCSWIC), and other relevant stakeholder associations. OEC will utilize regular SAFECOM and NCSWIC meetings, which it hosts, and other available opportunities for this purpose.

	Date of Publication	**Volume #**	**Number #**	**Page #**	**Comments Addressed**
60Day Federal Register Notice:	Thursday, April 27, 2017	82	80	19380	2
30-Day Federal Register Notice	Friday, August 4, 2017	82	149	36417	0

DHS received comments from two stakeholders indicating an appreciation for public outreach. DHS appreciates the comments and has not made any adjustments to the collection in relation to the comments.

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

Response…
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.

Response…
There are no assurances of confidentiality for this collection. This collection is not affected by the Privacy Act and is not impacted by a PIA or SORN.

No questions will be asked that may jeopardize the privacy of any respondent. Respondents will remain anonymous throughout the collection. Therefore, this collection is not impacted by the Privacy 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 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.

Response…
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.
Response…

The Office of Emergency Communications (OEC) is required by statute (6 U.S.C. § 573) to conduct an assessment on State, local, and tribal governments that defines the emergency communications needs for emergency response providers and relevant government officials. Therefore, the respondent's universe will include:

- State/Territorial Level government entities/agencies that have a role in emergency response, federally recognized Tribal Nations, and first responder entities, to include law enforcement, fire, emergency medical service, and public safety answer point(s), at the local level of government across the United States and Territories
- OEC has calculated the information collection's population universe as a whole to be *56,683. Broken down per the following:*
  - State/Territories=224 (56 states, territories and District of Columbia x 4 responses. Four responses are counted, one per each of the four targeted disciplines)
  - Tribal Nations=567[1]
  - Local=55,892 (The population data source for the local level is the National Public Safety Information Bureau Database,[2] whose directories contain comprehensive listings for law enforcement, fire, and EMS agencies and public safety answering points in the 50 U.S. states and the District of Columbia. Additionally, the National Geospatial Agency's Homeland Security Infrastructure Program [HSIP] Gold database was used for law enforcement, fire, EMS agencies and public safety answering points in the U.S. Territories)
- OEC estimates the total number of respondents to be 15,008. Our estimates per level of government are broken down as follows:

Level of Government	Number of Respondents
State/Territories	224
Tribal Nations	567
Local	14,217 (with an estimated response rate of 25%)
Total	**15,008**

- Total Frequency of Response: Once every five years (6 U.S.C. § 573 requires DHS through the OEC Director to conduct the survey no less than every five years)
- Total Annualized number of respondents: 15,008/5 = 3,001.6 rounded up to 3,002 respondents per year
- Total Annual hour burden: 3,002 x 0.5 (30 minutes equals 0.5 hours) = 1,501 hours burdened per year (the time burden of 30 minutes is based on the 2006 *SAFECOM National Interoperability Baseline Survey.*[3]

DHS will be using the formula: **(Mean Hourly Wage Rate) x (Benefit Multiplier)**

[1] Source: U.S. Department of Interior. Bureau of Indian Affairs. Tribal Leaders Directory. Website: https://www.bia.gov/index.htm

[2] Source: National Public Safety Information Bureau Database: Website: http://www.safetysource.com/lists/

[3] Source: *2006 SAFECOM National Interoperability Baseline Survey* Report. Website: http://www.npstc.org/resourceCD/2006%20National%20Interoperability%20Baseline%20Survey.pdf.

This formula determines the mean, fully-loaded hourly wage rate for each discipline. To do this, OEC counted the total number of agencies/departments that aligned to each discipline across the population universe to determine the portion/percentage of the *56,683 that should be aligned to each discipline for the purposes of determining the overall burden.* The total number of agencies /departments OEC used were data set entries listed by the Bureau of Indian Affairs and the National Public Safety Information Bureau plus the 224 state/territorial-level disciplinary responses:

Discipline	Percentage of Population
Law Enforcement	20%
Fire	42%
Emergency Medical Services	34%
Public Safety Answering Points	4%

For the purposes of these calculations, DHS is using data from the Bureau of Labor Statistics regarding the Mean Hourly Wage rate for each discipline. The Benefit Multiplier was designated as 1.462 for each discipline. The source-compensation factor is calculated using the BLS Economic News Release with December 2016 data on Employee Compensation. Accordingly, the source-compensation factor was derived by applying the following formula: Total compensation divided by Wages and salaries = compensation factor (i.e. $34.90 total compensation ÷ $23.87 in wages and salaries = 1.462 compensation factor).

In addition, as example to illustrate how the multiplier is applied to a public safety discipline specifically, the fully-loaded hourly wage rate for a Fire Department member is $34.68 ($23.72 BLS base rate x 1.462 compensation factor = $34.68[4]). This process is illustrated for all disciplines in Table A.12, and information sources for base pay by public safety discipline are cited in footnotes 5, 6, 7, and 8 below.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	No. of Respondents Annualized	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Law Enforcement[5]	614	1	0.5	307	$43.06	$13,219.42
Fire Department[6]	1249	1	0.5	625	$34.68	$21,675.00
Emergency Medical Services[7]	1007	1	0.5	504	$24.91	$12,554.64

[4] Source: Bureau of Labor Statistics (2015). *Firefighter Occupational Employment and Wages, May 2015*: Website: https://www.bls.gov/oes/2015/may/oes332011.htm

[5] Source: Bureau of Labor Statistics (2015). *Occupational Employment and Wages, May 2015 Police and Sheriff's Patrol Officers.* Website: https://www.bls.gov/oes/2015/may/oes333051.htm (29.45 *1.462=43.06*307=13,219.42)

[6] Source: Bureau of Labor Statistics (2015). *Occupational Employment and Wages, May 2015 Fire Fighters*. Website: https://www.bls.gov/oes/2015/may/oes332011.htm (23.72*1.462=34.68*624= 21,640.32)

[7] Source: Bureau of Labor Statistics (2015). *Occupational Employment and Wages, May 2015 Emergency Medical Technicians and Paramedics.* Website: https://www.bls.gov/oes/2015/may/oes292041.htm (17.04*1.462=24.91*504=12,554.64)

Public Safety Answering Points[8]	132	1	0.5	66	$28.11	$1,855.26
Totals	**3002**			**1501**		**$49,304.32**

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.

Response…

There is no recordkeeping, capital, start-up, or maintenance costs associated with this information collection.

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.

[8] Source: Bureau of Labor Statistics (2015). *Occupational Employment and Wages, May 2015 Police, Fire, and Ambulance Dispatchers.* Website: https://www.bls.gov/oes/2015/may/oes435031.htm (19.23*1.462=28.11*66=1,855.26)

Response…

Based on internal review, OEC personnel estimate that one GS-15, Step-5 will spend approximately 3 minutes (0.05 hours) per survey for design and administration; one GS-14, Step-5 will spend approximately 3 minutes per survey for design and administration; and one GS-13, Step-5 will spend approximately 9 minutes (0.15 hours) per survey for design and administration. In addition, one GS-13 will spend approximately 15 minutes (0.25 hours) for survey analysis.

The hourly rates for the Washington, DC locality were obtained from the FY 2017 federal General Schedule (GS). GS-13, Step-5 is $107,435 * 1.462 = $157,069.97/2080 = $75.51 fully-loaded wage rate. GS-14, Step-5 is $126,958 * 1.462 = $185,612.60/2080 = $89.24 fully-loaded wage rate. GS-15, Step-5 is $149,337 * 1.462 = $218,330.70/2080 = $104.97 fully-loaded wage rate.[9]

The cost for Survey Monkey is $1020 for the duration of testing, administering, and analyzing the survey.

Total Estimated Annual Cost to the Government = $**121,059.36**. This process is illustrated in Table A.14.

Table A.14: Annual Cost to the Government

Cost Category	Hours for Design / Administration per Survey	Hours per Survey Analysis	Annual Number of Surveys	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
GS-15	0.05	0	3002	150	$104.97	$15,745.50
GS-14	0.05	0	3002	150	$89.24	$13,386.00
GS-13	0.15	0.25	3002	1201	$75.51	$90,687.51
Survey Monkey	N/A	N/A	N/A	N/A	N/A	$1,020.00
Postal Service	**Total Number of Paper Surveys (0.5% of the Total No. of Respondents Annualized)**	**Cost of Postage (Send and Return per 1 Survey)**	**Total Annual Postage Cost**	**Printing Cost Per Survey ($0.01 per sheet of paper in the survey)**	**Total Annual Printing Cost**	
United States Postal Service	15	$14.40	$216.00	$0.29	$4.35	$220.35
					Total Cost	**$121,059.36**

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

[9] Source: U.S. Office of Personnel Management. 2017. *Pay and Leave: Salaries and Wages 2017 General Schedule Washington-Baltimore-Arlington, DC-MD-VA-WV-PA*. Website: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB.pdf.

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.

Response…
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.

If appropriate for public distribution (e.g., no sensitive information when aggregated, etc.), OEC will publish its reports resulting from collection through its website and, when required by statute, through direct distribution to Congress through the DHS Office of Legislative Affairs. OEC intends to utilize statistical sampling and analysis of emergency communications stakeholder community based upon region, locale size, jurisdiction, and other relevant factors.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

Response…
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.

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