

October 19, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – 0137

Title: Emergency Notification System (ENS)

Form Number(s): None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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. Provide a detailed description of the nature and source of the information to be collected.

FEMA’s Office of Response & Recovery (OR&R) owns and operates the Emergency Notification System (ENS). The ENS, designated by FEMA Directive 262-3 as the agency solution for all notification and alerts activities, sends electronic notifications and relays messages, whether critical in nature, routine, or for testing purposes with appropriate authorization, to DHS employees and contractors, as well as emergency response personnel. In accordance with Executive Order 12656, Presidential Policy Directive 40, and Federal Continuity Directive (FCD)-1, all DHS organizational components must have in place a viable Continuity of Operations Planning (COOP) capability and plan that ensures the performance of their essential functions during any

emergency or situation that could disrupt normal operations. An effective ENS solution is a critical part of this plan.

The National Response Framework (NRF) also requires proactive notification and deployment of federal resources in anticipation of or response to all hazards, threats, and emergencies. In accordance with the NRF and other directives as noted above, ENS utilizes electronic communications devices such as phone, text, and email messages, to share important electronic information with FEMA and other DHS emergency response personnel in the aftermath of a scheduled exercise or disaster and prompts immediate action to resolve or mitigate the all-hazard situation.

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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

ENS is an unclassified, web-based commercial off-the-shelf (COTS) emergency notification and personnel accountability suite known commercially as *Communicator NXT* which is produced by Cassidian Communications (<http://www.cassidiancommunications.com/notification-systems/>). The software provides the ability to electronically notify individuals and large groups of people in a very timely manner.

Emergency Notification System (ENS) Typical Transaction

DHS employees may perform electronic imports and collect, maintain, and update their respective users' contact information electronically, which includes name, user ID, login, email addresses and phone numbers. Either the FEMA Operations Center (FOC) Director, the Mobile Emergency Response Support (MERS) Operations Center (MOC), or Regional Operations Center (ROC) designates a Point of Contact (POC), based on operational requirements, for each DHS component and Federal agency. When users login to the ENS to enter or update their information, FEMA provides a privacy notice before the login screen. The FOC Director signs a Memorandum of Understanding (MOU) with each participating component, which maintains a separate ENS database.

The FOC provides training for each POC on the verbal privacy notice, which the POCs are required to give to those individuals who provide their contact information for the ENS. Each POC signs the Rules of Behavior. Once the POCs determine which employees to include in the ENS, they either manually enter the Personal Contact Information (PCI) via the contact screen, into the ENS or import the PCI via an electronic .csv file. The FOC conducts electronic imports for large groups. For FEMA and Federal Law Enforcement Training Centers (FLETC) employees, the ENS sends an electronic

message to each individual who is added to the System, indicating that he or she has become a “roster user.” Each entity (i.e., the POC, region or MOC) manages the contacts and data according to its operational procedures and guidelines. The FOC provides training to these entities to “stay within their lanes” to avoid disrupting or altering the operational roles of the other entities. When employees leave their respective agencies, the POCs delete their data from the system via the contact screen.

If an emergency affects a particular DHS component, the leadership of that component may choose to activate ENS scenarios according to its COOP or operational plan and as required by the situation. Every FEMA employee is subject to regular and recurring emergency management responsibilities, though not every position requires routine deployment to disaster sites. The location and circumstances surrounding an incident help determine which FEMA component or office, usually the FOC, the MOC, or the ROC, will activate a scenario within the ENS. The activation entails sending electronic information, alerts, and instructions intended for a specific audience or group for a specified event such as COOP or evacuation. Once activated, the ENS sends the users detailed electronic instructions on how to respond via a variety of devices, and the System tracks whether or not each user has acknowledged receipt of the message. Users respond by pressing “1” on their phones when instructed to do so, or by replying “YES” to the e-mail or text message.

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.

For ENS purposes, either recipients or their respective POCs must manage and maintain the accuracy of their own PCI via the ENS Contact screen. When users access the ENS to update their information, FEMA provides a privacy notice prior to logging in. Designated administrators, creators, and other users may have system rights to view or update the PCI of others under their command.

The primary users of the ENS software are the FOC personnel, DHS, and component POC’s. These users are trained and have administrative privileges to create, disable, and delete accounts. They can also create and activate scenarios and reports. The secondary users consist of individuals within the department, first responders, and emergency managers. These secondary users only have access to change their contact information through a web-based front end. FOC personnel, DHS, and component POC’s who administer user privileges are personnel who meet the requirements for access to DHS/FEMA networks.

The ENS is located at the FOC at the Mount Weather Emergency Operations Center (MWEOC), which enters into Memoranda of Understanding (MOUs) with each participating DHS component in order to outline the roles and responsibilities of FEMA and the respective components. The FEMA Alternate Operations Center East (FAOC-E) in Thomasville, Georgia contains a secondary, back-up system, and the FEMA Alternate Operations Center West (FAOC-W) in Denver, Colorado houses a tertiary backup system.

Users access the system through the web interface (<http://ens1auth.dhs.gov/>). You must be within the FEMA/DHS network to access this page. Users only have the ability to edit their own data when in the system with the exception of the few ENS Administrators.

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 form, and therefore is 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 have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA 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.

Without this data collection, the following problems will occur:

FEMA is committed to ensuring all organizational components are operational and ready to respond in the event of an emergency, major disaster, or threat to national security. The decision to activate the ENS will be made by a component's appropriate authorizing official and in accordance with component policy and procedures. The Secretary of Homeland Security or designee has the authority to activate scenarios impacting all DHS components. If an emergency affects an individual DHS component, the leadership of that component may make the decision to activate its individual scenarios as required by the situation. For example, if an emergency occurs that affects only FEMA Headquarters, the FEMA Administrator or Deputy Administrator can direct activation of the FEMA Headquarters Continuity of Operations Plan (COOP).

If an emergency affects a particular DHS component, the leadership of that component may choose to activate ENS scenarios according to its COOP or operational plan and as required by the situation. Every FEMA employee is subject to regular and recurring emergency

management responsibilities, though not every position requires routine deployment to disaster sites. The location and circumstances surrounding an incident help determine which FEMA component or office, usually the FOC, the MOC, or the ROC, will activate a scenario within the ENS. The activation entails sending electronic information, alerts, and instructions intended for a specific audience or group for a specified event such as COOP or evacuation. Once activated, the ENS sends the users detailed electronic instructions on how to respond via a variety of devices, and the System tracks whether or not each user has acknowledged receipt of the message. Users respond by pressing “1” on their phones when instructed to do so, or by replying “YES” to the e-mail or text message. Without the ENS in place, alerting emergency teams to respond to a catastrophic disaster, for example, would be extremely unorganized and difficult at best. It would be quite time consuming to personally call or email or text each team member on all their various devices. Further, it would nearly impossible to track the results of all those attempted notifications.

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.

A 60-day Federal Register Notice inviting public comments was published on June 20, 2017, 82 FR 28083. No comments were received from the public. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on September 18, 2017, 82 FR 43554. No comments were received. See attached copy of the published notice included in this package.

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.

FEMA hosted an ENS user group meeting in February 2011 for components using the system. FEMA sent invites out to other agencies that were interested in using ENS. ENS is a web-based Commercial Off-the-Shelf (COTS) emergency notification and personnel accountability suite known as Communicator NXT which is produced by Cassidian Communications, who also attended the meeting. The ENS Program Manager discussed the current users, provided an overview of how and what ENS is used for, explained how the back-up and data sync works between to secondary and tertiary sites, and described ENS best practices. Cassidian spoke about the product and what is coming in the future. The Security Officer spoke about current security issues with ENS. The ENS Administrative team talked about Short Message Service (text messages SMS), and Survey Module capabilities. Lastly, FEMA opened the meeting to an open discussion among the attendees. Since then FEMA has not had a user group meeting. FEMA has created a SharePoint site for internal usage within FEMA. There is also a DHS level SharePoint site in which users can post comments. FEMA provides training slides on both sites.

In Fiscal Year 2013, FEMA FOC budgeted for an outside analysis to be completed on ENS. The purpose of this Statement of Objective (SOO) was to provide an independent and objective analysis of the ENS capacity threshold. This baseline assessment which was conducted from 10/13 – 8/14 provided the FOC with statistical data upon which to make educated decisions regarding capacity and performance planning. The results of the analysis indicated that the ENS is capable of meeting existing contact objectives however, there were several recommendations which could improve efficiency. Most of the recommendations were implemented but a few were not due to resources (funding and personnel), and time constraints.

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.

FEMA consults twice a year with Federal, State, local governments to discuss ENS. These consultations involve discussions regarding the nature of information needed by FEMA to manage the ENS system. Partners offer comments and suggestions about their reporting practices. FEMA staff review and adjudicate all comments, questions, and inquiries received and consider recommendations to improve ENS.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on July 6, 2017.

The Emergency Notification System (ENS) is a privacy sensitive collection requiring Privacy Impact Assessment, PIA coverage and SORN coverage. This collection is covered by PIA, DHS/FEMA/PIA – 036, Emergency Notification System (ENS), approved by DHS on April 7, 2014. The system requires a Privacy Notice which serves a similar purpose to the Privacy Act Statement. The SORN coverage is DHS/FEMA-004, General Information Technology Access Account Records System of Records, November 27, 2012, 77 FR 70792.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question 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 for each collection instrument (separately list each instrument and describe information as requested). 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.

FEMA has estimated that approximately 500 respondents will respond to the ENS. There will be approximately 20 responses for a total of 10,000. It is estimated to take 0.01666 hours (1 minute) to respond. The total annual burden is estimated to be 10,000 responses x 0.01666 hours (1 minute) per response = 167 burden hours.

FEMA has estimated that approximately 200 respondents' accounts entered and populated with contact information in ENS. There will be approximately 20 responses for a total of 4,000. It is estimated to take 0.0833 hours (5 minutes) to set up an account. The annual burden is estimated to be 4,000 responses x 0.0833 hours (5 minutes) per response = 333 burden hours.

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 an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied

by 1.46 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

| Estimated Annualized Burden Hours and Costs | | | | | | | | |
|--|--|--------------------|---------------------------------|------------------------|-------------------------------------|--------------------------------|-----------------------|------------------------------|
| Type of Respondent | Form Name / Form Number | No. of Respondents | No. of Responses per Respondent | Total No. of Responses | Avg. Burden per Response (in hours) | Total Annual Burden (in hours) | Avg. Hourly Wage Rate | Total Annual Respondent Cost |
| Business or other for-profit; Federal Government | Emergency Notification System (ENS) Response Time / No Form | 500 | 20 | 10,000 | 1 minute (0.01666) | 167 | \$28.82 | \$4,812.94 |
| Business or other for-profit; Federal Government | Emergency Notification System (ENS) Initial Set-Up / No Form | 200 | 20 | 4,000 | 5 minutes (0.0833) | 333 | \$28.82 | \$9,597.06 |
| Total | | 700 | | 14,000 | | 500 | | \$14,410.00 |

• Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics website <https://www.bls.gov/oes/current/oes435031.htm> the occupational employment wage rate category 43-5031, Police, Fire, and Ambulance Dispatchers (May 2016), is estimated to be \$28.82 (\$19.74 x 1.46 = \$28.82) per hour including the wage rate multiplier. The estimated burden hour cost to respondents (Emergency Personnel) is \$14,410.00 annually.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing 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.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no record keeping, 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.

Annual Cost to the Federal Government

| Item | Cost (\$) |
|---|---------------------|
| Contract Costs [Describe] See maintenance support below. | 0 |
| Staff Salaries* [One GS 12, step 1 employees spending approximately 8 hours annually for this data collection] $\$30.05 \times 1.46 = \$43.87 \times 8 \text{ hrs.} = \350.96 (includes a 1.46 multiplier to reflect a fully-loaded wage rate) | \$350.96 |
| Facilities [cost for renting, overhead, etc. for data collection activity] N/A | 0 |
| Computer Hardware and Software [cost of equipment annual lifecycle] | 0 |
| Equipment Maintenance [cost of annual maintenance/service agreements for equipment] For a support maintenance agreement with the vendor Cassidian. Annual maintenance (\$173,000) Contract # is: HSFE50-13-P-0108 | \$173,000 |
| Travel N/A | 0 |
| Printing [number of data collection instruments annually] | 0 |
| Postage [annual number of data collection instruments x postage] | 0 |
| Other | 0 |
| Total | \$173,350.96 |

* Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate. Hourly basic wage rate by grade and step (\$30.05) comes from OPM's Salary Table 2017-GS, located at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

| Itemized Changes in Annual Burden Hours | | | | | | |
|--|---|----------------------|------------|---|------------------|------------|
| Data collection Activity/Instrument | Program Change (hours currently on OMB Inventory) | Program Change (New) | Difference | Adjustment (hours currently on OMB Inventory) | Adjustment (New) | Difference |
| Emergency Notification System (ENS) Response Time / No Form | | | | 167 | 167 | 0 |
| Emergency Notification System (ENS) Initial Set-Up / No Form | | | | 333 | 333 | 0 |
| Total(s) | | | | 500 | 500 | 0 |

Explain:

There are no changes to the annual hour burden previously reported and there has been no change to the information being collected.

Itemized Changes in Annual Cost Burden

Explain:

There is no cost burden for this 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.

There are no outline plans for tabulation and publication of data for this information collection.

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

This collection does not seek approval to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.