

Supporting Statement for Paperwork Reduction Act Submissions

Title: Statewide Communication Interoperability Plan (SCIP) Template and Annual SCIP Snapshot

OMB Control Number: 1670-0017

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 Department of Homeland Security, National Protection and Programs Directorate, Office of Cybersecurity and Communications, Office of Emergency Communications (OEC), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 571 et seq., is required, pursuant to 6 U.S.C. § 572, to develop the National Emergency Communications Plan (NECP), which includes identification of goals, timeframes, and appropriate measures to achieve interoperable communications capabilities. The Statewide Communication Interoperability Plan (SCIP) Template and Annual SCIP Snapshot Report are designed to meet and support these statutory requirements.

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 will use the information from the SCIP Template and Annual SCIP Snapshot to track the progress States are making in implementing milestones and demonstrating goals of the NECP, as required through the Homeland Security Act of 2002, 6 U.S.C. § 572. The SCIP Template and Annual SCIP Snapshot will provide OEC with broader capability data across the lanes of the Interoperability Continuum, which are key indicators of consistent success in response-level communications.

In addition, the SCIP Template and the SCIP Snapshot will assist States in their strategic planning for interoperable and emergency communications while demonstrating each State's achievements and challenges in accomplishing optimal interoperability for emergency responders. Moreover, certain government grants may require States to update their SCIP Templates and SCIP Snapshot to include broadband efforts in order to receive funding for interoperable and emergency communications.

Statewide Interoperability Coordinators (SWICs) will be responsible for collecting this information from their respective stakeholders and governance bodies, and will complete and submit the SCIP Snapshots directly to OEC through unclassified electronic submission.

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.

The SCIP Template and Annual SCIP Snapshot may be submitted through unclassified electronic submission to OEC by each State's SWIC. In addition to being able to submit their respective SCIP Template and Annual SCIP Snapshot via email to SCIP@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 not collected in any other form and, therefore, is not duplicated elsewhere. A review of reginfo.gov revealed other State reporting requirements; however, no other collection related to reporting interoperable communications capabilities.

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/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 carry out its key statutory responsibilities, which include identifying States' progress in implementing goals and milestones of interoperable emergency communications as outlined in the NECP.

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.

The two comment periods lasted 60 days and 30 days respectively. OEC considered all public comments received.

	Date of Publication	Volume Number	Number	Page Number	Comments Received
<i>60-Day Federal Register Notice:</i>	Friday, December 1, 2017	82	230	56985	0
<i>30-Day Federal Register Notice</i>	Wednesday, February 28, 2018	83	40	8688	0

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.

OEC does not anticipate that classified or other sensitive information will be provided through this information collection. Further, information protected by the Privacy Act of 1974 will be kept private to the extent allowable by law. However, OEC makes no assurances of confidentiality.

Based on the Privacy review, the collection does not collect PII and is not impacted by a SORN or PIA.

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 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.

OEC estimates the total time required for each State's SWIC to complete the SCIP Template and the Annual SCIP Snapshot amounts to 6 hours, including clerical time. Since OEC will conduct

annual SCIP Workshops to assist States with updating their new SCIP, only one burden hour will be dedicated to completing the SCIP Template and one burden hour will be dedicated to completing the Annual SCIP Snapshot.

There is one SWIC or individuals fulfilling SWIC duties per State or territory; therefore there are 56 SWICs within the United States and territories. To determine the burden hour cost for the SCIP Template, OEC multiplied the total number of respondents (56 SWICs) by 3 burden hour resulting in 168 total annual burden hours. To estimate the cost of this collection, NPPD uses the mean hourly wage of state-level management occupation of \$47.14¹. NPPD then applies a load factor of 1.4639 to this average wage to obtain a fully loaded average hourly wage of \$69.01.² At a fully loaded wage of \$69.01, multiplied by 168 total annual burden hours, the dollar value associated with the existing elements of the SCIP Template equals \$11,594.

To determine the annual burden hour cost for the Annual SCIP Snapshot Report, OEC multiplied the total number of respondents (56 SWICs) by 3 burden hour resulting in 168 total annual burden hours. To estimate the cost of this collection, NPPD uses the mean hourly wage of state-level management occupation of \$47.14³. NPPD then applies a load factor of 1.4639 to this average wage to obtain a fully loaded average hourly wage of \$69.01.⁴ At a fully loaded wage of \$69.01, multiplied by 168 total annual burden hours, the dollar value associated with the existing elements of the Annual SCIP Snapshot Report equals \$11,594.

Adding the SCIP Template’s total annual respondent cost to the Annual SCIP Snapshot Report’s total annual respondent cost equals \$23,188.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Report Name	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
States and territories’ SWICs	SCIP Template	56	1	3	168	\$69.01	\$11,594
States and territories’ SWICs	Annual SCIP Snapshot Report	56	1	3	168	\$69.01	\$11,594

¹ <https://www.bls.gov/oes/2016/may/999201.htm#11-0000>

² Load factor based on BLS Employer Cost for Employee Compensation, as of June 9, 2017. Load factor = Employer cost for employee compensation (\$35.28) / wages and salaries (\$24.10) = 1.4639 <https://www.bls.gov/news.release/ecec.nr0.htm>

³ <https://www.bls.gov/oes/2016/may/999201.htm#11-0000>

⁴ Load factor based on BLS Employer Cost for Employee Compensation, as of June 9, 2017. Load factor = Employer cost for employee compensation (\$35.28) / wages and salaries (\$24.10) = 1.4639 <https://www.bls.gov/news.release/ecec.nr0.htm>

Totals		56	1	6	336		\$23,188
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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 this collection. As all reports are completed via email, 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.

Based on internal review, OEC personnel estimate it takes approximately three hours to review each State’s revised SCIP Template and Annual SCIP Snapshot. To estimate the burden of this collection on the government, NPPD multiplies the hour burden by the fully loaded hourly wage of a GS-13 Step 5 employee. Per the Office of Personnel Management, a GS-13 Step 5 in the Washington, D.C metro area has an hourly wage of \$51.48⁵. Multiplying this wage by the load factor of 1.4639⁶ provides us with a fully loaded wage of \$75.36. Multiplying this fully loaded wage by the annual burden of 168 hours results in an annual burden of \$12,660. This is presented in Table 3.

Table 3: Government Burden

Cost Category	Report Name	Hours for Design/ Administration	Hours per Report	Number of Reports	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
Total Operation and Maintenance Cost	SCIP Template	0	1	56	56	\$75.36	\$4,220
Total Operation and Maintenance Cost	Annual SCIP Snapshot Report	0	2	56	112	\$75.36	\$8,440
Total		0	3		168		\$12,660

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

⁵ A GS-13 Step 5 in the DC area has an annual salary of \$107,435. Dividing by 2087 yields an hourly wage of \$51.48. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB.pdf>

⁶ Load factor based on BLS Employer Cost for Employee Compensation, as of June 9, 2017. Load factor = Employer cost for employee

compensation (\$35.28) / wages and salaries (\$24.10) = 1.4639 <https://www.bls.gov/news.release/ecec.nr0.htm>

changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

OEC streamlined its annual SCIP reporting process to obtain standard data to understand progress and challenges in emergency communications planning. OEC replaced the lengthier Annual Progress Report with the SCIP Snapshot (“Snapshot”) as a reporting mechanism for States and territories for submitting SCIP progress, achievements and challenges. The data collected is based on calendar year reporting. The SCIP Snapshot also includes sections for States and territories to report on the status of governance structures, progress towards SCIP goals and initiatives, and overall successes and challenges in advancing interoperable emergency communications. This Snapshot Reporting has reduced the burden time from 7 hours to 3 hour.

As result of all the changes, the total burden estimates for the collection have reduced by 4 burden hours per response, 224 total annual burden hours, and \$5,730 total annual burden cost (from \$28,918 to \$23,188). Also, the government burden and cost has been reduced by 1 hour per response, 56 annual burden hours, and \$14,871 (from \$23,311 to \$12,660).

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.

All States and territories have to submit their Annual SCIP Snapshots. The results of the information collection for individual States will be publicly available; however because OEC has deemed the information collection as sensitive national security information, it will not release individual State data or publish a report for statistical or other purposes that compares the progress of one or more States with any other. Instead, OEC will develop an aggregate SCIP Snapshot Report that presents a national perspective on State’s supporting and advancing interoperable emergency communications. The national summary report will also identify gaps in capabilities that have evolved or remain unchanged as a result of the implementation.

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.