

## Supporting Statement for Paperwork Reduction Act Submissions

**Title:**

**OMB Control Number: 1670-NEW**

### **National Counter-Improvised Explosive Device Capabilities Analysis Database 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.

Under the Homeland Security Presidential Directive-19: *Combating Terrorist Use of Explosives in the United States (HSPD-19)*, the Department of Homeland Security (DHS) was mandated to have a regularly updated assessment of domestic explosives-related capabilities. It required DHS to expand its National Capabilities Analysis Database, which is now known as the National Counter-Improvised Explosive Device Capabilities Analysis Database (NCCAD). Currently, the President's Policy Directive-17: *Countering Improvised Explosive Devices (PPD-17)* reaffirms the 2007 Strategy for Combating Terrorist Use of Explosives in the United States. It provides guidance to update and gives momentum to our ability to counter threats involving improvised explosive devices (IEDs).

Over the past 10 years, incidents involving IEDs has increased worldwide. This highlights the existing threat of IED attacks by terrorists, transnational criminal organizations, and individuals domestically that have radical political, environmental, or international viewpoints. IEDs have been used in the theater of war, mass transit systems overseas, in global aviation plots (December), assassination attempts against political leaders, and other attempts here within the United States. They have also been used to threaten our ability in the secure movement of goods in accordance with the National Strategy for Global Supply Chain Security (print cartridge).

The NCCAD provides State, local, tribal and territorial law enforcement stakeholders a method to identify their level of capability to prevent, protect, mitigate, and respond to an IED threat. It also provides Federal stakeholders an overarching view of the Nation's collective counter-IED capabilities. This is critical information particularly during IED threats, planning for large events, etc.

HSPD-19 statute is attached. PPD-17 is restricted from public review. All requests for distribution should be faxed to the NSS Senior Director for Records and Access Management at (202) 456-9200.

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.

Information is collected by Office for Bombing Prevention (OBP) personnel and/or contractors working for OBP. These individuals travel to locations across the Nation to gather the requisite information. OBP personnel and/or contractors facilitate initial baseline assessments either face-to-face or via webinar in order to get stakeholders familiar with the NCCAD system, provide clarifying information, and answer questions. Federal, State, local, tribal, and territorial law enforcement personnel with a counter-IED mission assist NCCAD personnel to coordinate a location that contains internet capability for laptops or a computer training room with internet capability, a projector for displaying purposes, and personnel from the four disciplines (bomb squads, explosives detection canine, special weapons and tactics teams (SWAT), and dive units) to take their respective assessment. The OBP facilitator begins by conducting a short brief on the reasons for NCCAD and how it can help them as units.

### NCCAD ASSESSMENTS

There are a total of 56 tasks bundled into specific question sets spread across the four (4) disciplines representing specific tasks encompassing personnel, training, and equipment. The OBP and the NCCAD team used federal requirements (FEMA Resource Typing) to create the overarching list of questions in the question sets. Where there were no requirements, OBP and NCCAD worked with subject matter experts to identify best practices to create the assessments. Subject matter experts and federal/state/local agency representatives collaborated to rank and stack each question and question set in order of importance and priority. At that time, weights were assigned to the questions, which provide the capability calculation for the whole question set.

The first group of questions in the assessment focus on the profile of the unit, i.e., the number of technicians/handlers; primary assignment versus collateral duty assignment; number of IED responses in the past twelve (12) months; number of special events in the past twelve (12) months. The rest of question sets are delineated by task:

- Implement Intelligence/Information Gathering and Dissemination;
- Implement Bombing Incident Prevention and Response Plans;
- Incident Analysis;
- Incident Mitigation;
- Access Threat Area;
- Contain or Mitigate Hazards;
- Conduct Scene Investigations; and
- Maintain Readiness.

Each discipline's questionnaire only includes question sets specific to that discipline. This means that while multiple disciplines may have the same question set title, the questions may not be the same. For example, the SWAT and canine questionnaires both have the question set, Maintain Readiness, however, only the canine questionnaire includes specific questions about leashes, water bowls, and kennels, as equipment needed to maintain readiness. This tailoring allows for a large question pool, while ensuring specificity depending on the discipline being assessed.

The information from each individual unit is collected into the database. Upon completion of inputting the unit information, the program, using the appropriate algorithms, creates a capabilities analysis report for the unit commander. The report identifies current capabilities, existing gaps, and makes recommendations for closing those gaps. Additionally, the NCCAD allows the unit commander to identify the most efficient and effective purchases of resources to close those gaps. At the State, regional, and National-levels, the data is aggregated within the selected discipline and provides a snapshot of the counter-IED (C-IED) capabilities across the discipline. OBP also intends to identify the lowest, highest, median, and average capability levels across units, States, regions, disciplines, and the Nation. This data will be used to provide snapshots of the C-IED capabilities and gaps to inform decision-makers on policy decisions, resource allocation for capability enhancement, and crisis management. Data collected will be used in readiness planning, as well as steady-state and crisis decision support during threats or incidents. NCCAD data will assist operational decision-makers and resource providers in developing investment justifications that support State homeland security strategies and national priorities.

#### NATIONAL INCIDENT MANAGEMENT SYSTEM (NIMS) RESOURCE TYPING ASSESSMENT

The NIMS Resource Typing assessment is a subset of the NCCAD assessment questions which identify the number and type of bomb response teams that a unit has based on its composition. There are seven (7) tasks with a total of 32 questions. Resource Typing Definitions are used to categorize, by capability, the resources requested, deployed, and used in incidents. Measurable standards identifying resource capabilities and performance levels serve as the basis for this categorization. National NIMS resource types support a common language for the mobilization of resources (equipment, teams, units, and personnel) prior to, during, and after major incidents. Resource users at all levels use these definitions as a consistent basis when identifying and inventorying their resources for capability estimation, planning and for mobilization during mutual aid efforts. National NIMS resource types represent the minimum criteria for the associated component and capability.

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.

All responses are collected via electronic means via the virtual assessment program. While the actual data collection is done through the NCCAD database, OBP personnel facilitate the collection of the data by assisting users via a face-to-face discussion or webinar. This is particularly useful for first time users to understand the nuances of the NCCAD system and how they can use their assessment to help justify resource requests and help with steady-state and threat-initiated decision-making. It is NCCAD policy to not accept the questionnaires in paper format. If there is a power outage at the event site or if the website is down due to technical reasons, facilitators have copies of the paper format for stakeholders to continue filling out. Facilitators do not collect these hard copies. Stakeholders keep them to update the electronic assessment when they next access it.

We are cutting down this possibility even more by beginning the utilization of tablets and hotspots for those individuals who do not have laptops or internet access.

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.

NCCAD developers and analysts routinely review NCCAD information for duplication of units. There is no similar information already available to be used or modified for analyzing the counter-IED mission capabilities of Federal, State, local, tribal, and territorial law enforcement in the Nation.

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.

NCCAD collection of information does impact small entities, such as Federal, State, local, tribal and territorial law enforcement entities, with a population of less than 50,000. In order to minimize the impact, NCCAD personnel travel to localities near to or within an acceptable distance to ensure the least travel time needed by law enforcement. Additionally, NCCAD personnel make every effort to conduct all four disciplines' assessments over an eight-hour period, normal work day to minimize law enforcement's time away from their regular day position. Additionally, once NCCAD data is collected, it usually only takes 15-30 minutes to update per year after the initial assessment.

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 the collection of counter-IED mission capabilities is not conducted, there are serious consequences to the ability of DHS and the Federal government, as a whole, to ensure that monies spent to support and enhance counter-IED capabilities across the country are spent effectively and efficiently. This would result in the Federal and State governments spending monies that are more and more limited due to reductions in budgets and require all entities to ensure that any monies spent are spent judiciously.

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.

There are no 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. Respondents are encouraged to update annually at minimum or anytime they acquire new resources (personnel, equipment, and/or training).
- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it. There is no written response due. If the unit does not complete its assessment during the regular NCCAD event, OBP personnel follow up approximately one week later to remind the unit and request the completion of the assessment.
- (c) Requiring respondents to submit more than an original and two copies of any document. NCCAD does not require submission of an original or copies of any documents. The assessment is predominantly completed online and only rarely is it necessary for a unit to complete the written version of the assessment for input into the system later.
- (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years. This program does not require any retention of the written version of the assessment.
- (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. There will be no circumstances that an information collection would be done in connection with a statistical survey that does not produce valid and reliable results.
- (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB. There will never be 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. There is no circumstance this would occur. There is no pledge of confidentiality for respondents.
- (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. Respondents are only capable of seeing their own individual data. Only analysts have the capability of seeing all respondents' individual data. Managers in the system can only see data as assigned to them

based on their need-to-know (Arkansas Homeland Security Advisor can only see Arkansas unit information), including aggregated data.

**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.

	<b>Date of Publication</b>	<b>Volume #</b>	<b>Number #</b>	<b>Page #</b>	<b>Comments Addressed</b>
<i>60-Day Federal Register Notice:</i>	Thursday, August 16, 2018	83	159	40778	0
<i>30-Day Federal Register Notice</i>	Tuesday, November 27, 2018	83	228	60883	0

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

There will be no payment or gift given to respondents.

**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, DHS/OBP applies the following, with respect to information/systems security and privacy:

An individual point of contact (POC) is limited to accessing only the information specific to the unit for which that individual has been granted access. For example, a POC for bomb squad unit X can only access the unit-specific information for bomb squad unit X. If a POC is in control of more

than one unit, for example, a Sheriff that is both the bomb squad commanders and SWAT commander, NCCAD has the ability to allow the POC access to both units' information.

State and Region-level managers (HSAs, Regional Planners) can see and access unit-specific and aggregated data from the units ONLY within their area of responsibility (AOR) as designated within NCCAD. This allows them to see the overall C-IED capabilities within their AORs without allowing them access to unit information this is not within their AOR and which they do not have a need to know. They are unable to change any information and access is limited to read-only.

At the National-level, analysts/developers have the potential to see and access all of the information in NCCAD, both aggregated and unit-specific data. For analysts that only compile data for informational purposes, such as incident awareness, access is limited to read-only at both the aggregated data and unit-specific levels. This is critical for identification of C-IED capabilities when drafting policies and during threats or incidents. Analysts who work directly with the units, such as the NCCAD facilitators and OBP personnel, have full access to NCCAD at all levels of data, including the ability to create, modify, and/or delete units and users. NCCAD developers have full access to the source code that drives NCCAD, but strictly read-only access to the data. This allows them to identify any changes to the appearance and usability of NCCAD as they modify the NCCAD system.

This collection is privacy sensitive. The Privacy Impact Assessment associated with this collection is DHS/NPPD/PIA-023, Infrastructure Protection Gateway. The System of Records Notice (SORN) associated with this collection is DHS/ALL-004, General Information Technology Access Account Records System (GITAARS).

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, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. There is no reason the agency would consider these types of questions necessary.

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.

Estimates and justification of burden hours for information collection:

To estimate the burden of the NCCAD requirements, the Department calculates the time and cost associated with the initial response to a full assessment, as well as the annual updates to the full assessment for four groups of respondents: bomb squads; explosive detection canine units; dive units; and SWAT units. We estimate the current population of these groups to be 505 bomb squads, 3000 explosive detection canine units, 300 dive units, and 2400 SWAT units.

The Department estimates that 25% of the population for each group will complete a full assessment for each year of this collection. In addition, we also estimate that 400 of the 505 bomb squads have already completed full assessments. In this collection, we account for the burden for the assessments already completed by the bomb squads as well as the expected full assessments for the three-year period. Table 1 presents the number of full assessments by year for each group.

Table 1: Full Assessments by Year

	Bomb Squad	Explosives Detection Canine	Public Safety Dive Team	SWAT Team	Total
Year 1	426	750	75	600	1,851
Year 2	26	750	75	600	1,451
Year 3	26	750	75	600	1,451
Total	479	2,250	225	1,800	4,754

To calculate the burden associated with completing a full assessment, the department multiplies the number of assessments by the estimated time necessary to complete an assessment. This time burden is then multiplied by the average fully loaded wage of the employee completing the assessment. Based on past experience with the affected population, as well as internal trials completing the assessment forms, the Department estimates that full assessment with take two hours to complete. To calculate the labor costs for the stakeholders completing the assessments, we used the fully loaded hourly wage for Police and Sheriff’s Patrol Officers from the Bureau of Labor Statistics (occupation 33-3051)<sup>1</sup>. The mean hourly wage is \$31.00, which we multiply by a load factor of 1.3977, which is the ratio of total compensation to salaries and wages, to account for benefits. The fully loaded wage is \$43.33. Table 2 presents the hour burden of 9,508 hours and labor cost of \$411,935 for this collection.

Table 2: Full Assessment Cost Burden

<sup>1</sup> <https://www.bls.gov/oes/2017/may/oes333051.htm>



	Respondents	Time Burden (hours)	Total Time Burden	Hourly Wage	Labor Cost
Year 1	1,851	2	3,703	\$43.33	\$160,420
Year 2	1,451	2	2,903	\$43.33	\$125,758
Year 3	1,451	2	2,903	\$43.33	\$125,758
Total	4,754		9,508		\$411,935

Upon completing a full assessment, respondents are expected to file annual updates with the Department. Based on program estimates, we expect 75% of bomb squads that have completed a full assessment to submit an annual update, while 50% of explosive detection canine units, public safety dive teams, and SWAT teams are expected to file annual updates. Table 3 presents the number of respondents expected to submit an annual update.

Table 3: Annual Updates

	Bomb Squad	Explosives Detection Canine	Public Safety Dive Team	SWAT Team	Total
Year 1	300				300
Year 2	620	375	38	300	1,332
Year 3	339	750	75	600	1,764
Total	1,259	1,125	113	900	3,397

To calculate the burden associated with completing an annual update, the department multiplies the number of respondents by the estimated time necessary to update an assessment. This time burden is then multiplied by the average fully loaded wage of the employee completing the assessment. Based on similar experience as with the full assessment, the Department estimates that an annual update will take 30 minutes to complete. To calculate the labor costs for the stakeholders completing the assessments, we used the same wage as above, which is \$43.33. Table 4 presents the annual hour burden of 1,698 hours and annual labor cost of \$73,582 for this collection.

Table 4: Annual Update Cost Burden

	Respondents	Time Burden (hours)	Total Time Burden	Hourly Wage	Labor Cost
Year 1	300	0.5	150	\$43.33	\$6,499
Year 2	1,332	0.5	666	\$43.33	\$28,860
Year 3	1,764	0.5	882	\$43.33	\$38,223
Total	3,397		1,698		\$73,582

The total cost for this collection, complete submissions and annual updates, is \$485,517 (\$411,935 + \$73,582), and an average annual burden of \$161,839 (\$485,517 / 3).

The number of Full Assessment responses are 4,754, with an annual average of 1,585, and the burden hours of 9,508, with an annual average of 3,169. The number of Annual Update responses are 3,397, with an annual average of 1,132, and the burden hours of 1,698, with an annual average of 566.

Therefore, for the collection, the total annual responses are 2,717 (1,585 + 1,132) and the total annual burden hours are 3,735 (3,169 + 566).

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 are no technology or personnel costs incurred by stakeholders to provide input into NCCAD.

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.

The Office for Bombing Prevention currently contracts out for the assessments and analysis portion, as well as the operations and maintenance portion of NCCAD. For the data collection piece (assessments and analysis), the current contract is \$984,665 for two (2) years, the initial base year and an additional option year. This contract supports the use of contract personnel to travel to stakeholder locations and/or hold webinars in order to collect NCCAD data. It also supports the use of subject matter experts to produce analysis regarding the level of counter-IED capability across disciplines, regions, States, and nation-wide.

The second contract is \$1,123,897 for two (2) years, the initial base year and an additional option year. This contract supports the rental and use of development and situation servers at the contractor's location. It also provides for the use of data code developers to update current programming code and create new programming code based on input from the U.S. Government and analysis of NCCAD data. Software purchases are allotted under this contract. NCCAD resides on a U.S. Government server and all costs for hosting are incorporated there. Verisign certification costs approximately \$1,300 per year and is required for every year NCCAD exists in order to maintain its certification and accreditation status.

The annualized government cost for these contracts is \$1,055,581, which we calculate by dividing the value of each contract by the term of the contract and adding the three contract annual values together.

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.

This is a collection in use without an OMB Control Number and is being brought into compliance with the Paperwork Reduction Act.

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.

Results are not collectively published, and no plans exist to collectively publish in the future. All output is made available through the NCCAD website as selectable, automatically-generated reports. No manual compilation is conducted, and only fundamental analytical techniques are used.

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

DHS is not seeking approval to not display the expiration date for OMB approval of the 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.

There are no exceptions being requested.