

Supporting Statement for Paperwork Reduction Act Submissions

Title: Technical Assistance Request and Evaluation

OMB Control Number: 1670-0023

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 Emergency Communications Division (ECD), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 571 et seq., as amended, provides emergency communications-related technical assistance at no charge to State, regional, local, and tribal government officials. To receive this technical assistance, stakeholders must submit a request form identifying their priorities. In order for ECD to assess the value of the services it provides through technical assistance, an evaluation form is also requested of those receiving technical assistance.

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.

ECD uses the Technical Assistance Request Form to identify the number and type of technical assistance services needed by the State, territory, local, and tribal agencies. This information enables ECD to plan and align resources accordingly. ECD considers each request based on the priority indicated by the State, as well as the anticipated impact of the service offering on the implementation of the Statewide Communications Interoperability Plan (SCIP) and the applicability to National Emergency Communications Plan (NECP). The evaluation form is completed by stakeholders at the completion of ECD technical assistance services and enables ECD to assess the quality of technical assistance services provided and, in a holistic fashion, measure the value of the services. The information collected through these evaluations is used by ECD for continued improvement planning. The following forms are completed by State, territory, local, and/or tribal government employees and collected through unclassified electronic or manual submission:

DHS Form 9043 – Technical Assistance Request Form

ECD uses the Technical Assistance Request Form (DHS Form 9043) to collate requests for technical assistance and evaluate the impact of requests on the attainment of the NECP goals, objectives, and initiatives. These request forms are completed by statewide interoperability coordinators (SWICs) or their designees at the start of the technical assistance review cycle, and on an as needed basis when out-of-cycle.

DHS Form 9042 – Technical Assistance Evaluation Form

ECD uses the Technical Assistance Evaluation Form (DHS Form 9042) to conduct a review of the effectiveness and adequacy of technical assistance services provided to State and local officials for interoperable and operable communications. These evaluation forms are submitted by the technical assistance points of contact for the event at the completion of technical assistance services.

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.

Approximately 100 percent of request and evaluation forms are submitted electronically by logging into the portal at <https://www.dhs.gov/ictapscip-resources>. From the website, users are able to select the appropriate form, either the Technical Assistance Requests (DHS Form 9043) and/or the TA Evaluation forms (DHS Form 9042), to complete as a fillable PDF. Each form is then submitted by email to either TARequest@hq.dhs.gov or TAevaluations@hq.dhs.gov, respectively.

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.

A search of reginfo.gov revealed that this information is specific to the ECD Technical Assistance program and as such is not otherwise collected in any form and 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 impact 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 ECD does not collect this information it will not be able to effectively carry out a key statutory responsibility of the office, which is to provide technical assistance services to State, regional, local, and tribal government officials. In addition, without this collection, 6 U.S.C. § 571(c)(6). ECD will be unable to gather sufficient information for quality assurance or quality improvement purposes.

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.

	Date of Publication	Volume #	Number #	Page #	Comments Addressed
<i>60 Day Federal Register Notice</i>	Tuesday, October 9, 2018	83	195	50675 – 50676	0
<i>30 Day Federal Register Notice</i>	Friday, February 15, 2019	84	32	4516 – 4517	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.

While there are no assurances of confidentiality, information is protected by the Privacy Act of 1974 and is kept private or anonymous to the extent allowable by law.

The DHS Privacy Office review finds that this is a privacy sensitive collection requiring a Privacy Impact Assessment (PIA) and System of Records Notice (SORN). The collection is covered by PIA – DHS/ALL/PIA-006 DHS General Contacts List and SORN – DHS/ALL-002 DHS Mailing and Other Lists System, 73 FR 71659 (Nov. 25, 2008).

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 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.

Each year, public-safety stakeholders (e.g., police, fire, EMS, emergency managers, dispatchers, radio operators, and government workers) request and evaluate technical assistance (TA) ser-

vices. These requests are submitted by the SWIC in the form of a Technical Assistance Request Form.

Each year, SWICs from 56 states and territories may submit a Technical Assistance Request Form. ECD estimates that on average, SWICs from 47 states and territories each submit two Technical Assistance Request Forms per year. The Technical Assistance Evaluation Form is voluntary and on average, ECD receives 128 Technical Assistance Evaluation Forms per year.¹ Based on better estimates, the total time needed to complete the Technical Assistance Request Form and Technical Assistance Evaluation Form amounts to 0.42 hours (25 minutes) and 0.08 hours (5 minutes), respectively, including clerical time.

To estimate the burden associated with completing the forms, ECD multiplies the number of forms by the estimated time necessary to complete a form. As shown in Table A.2, ECD estimates that burden to complete Technical Assistance Request Forms amounts to 39 hours per year² and 118 hours over a 3-year period. As shown in Table A.3, ECD estimates that burden to complete Technical Assistance Evaluation Forms amounts to 11 hours per year³ and 32 hours over a 3-year period.

To estimate the labor costs for the respondents (including stakeholders and SWICs), ECD uses the average hourly compensation rate for State and local government workers. ECD used Bureau of Labor Statistics (BLS) data to estimate the average hourly wage rate for State and local government staff for all occupations.⁴ The weighted average hourly wage rate for State and local government workers is \$26.04.⁵ To account for benefits, ECD multiplies this average hourly wage rate by a compensation factor of 1.5966⁶, which is the ratio of total compensation to salaries and wages. The average hourly compensation rate is \$41.57.⁷

To estimate the labor cost for the respondents to complete the forms, ECD multiplies the total annual time burden by the average hourly compensation rate. As shown in Table A.2, ECD estimates the labor cost to complete the Technical Assistance Request Forms amounts to \$1,628.11 per year and \$4,884.34 over a 3-year period. As shown in Table A.3, ECD estimates the labor cost to complete the Technical Assistance Evaluation Forms amounts to \$443.40 per year and \$1,330.20 over a 3-year period.

¹ Based on ECD data of annual submissions from 2014 to 2017.

² 39 hours per year = 47 respondents per year × 2 responses per respondent × 0.42 hours per response.

³ 11 hours per year = 128 respondents per year × 1 response per respondent × 0.08 hours per response.

⁴ BLS. Occupational Employment Statistics. May 2017. National industry-specific and by ownership. All Occupations (00-0000). <https://www.bls.gov/oes/tables.htm>. There are 4,530,380 State government employees that earn an average hourly wage of \$28.49. There are 14,500,490 local government employees that earn an average hourly wage of \$25.27.

⁵ \$26.04 per hour = (4,530,380 State government employees × \$28.49 per hour + 14,500,490 local government employees × \$25.27 per hour) ÷ (4,530,380 State government employees + 14,500,490 local government employees).

⁶ BLS. Employer Costs for Employee Compensation – December 2017. Table 4. Employer Costs per Hour Worked for Employee Compensation and Costs as a Percent of Total Compensation: State and Local Government Workers, by Occupational and Industry Group, December 2017. https://www.bls.gov/news.release/archives/ecec_03202018.pdf. The compensation factor of 1.5966 is estimated by dividing total compensation (\$49.19) by wages and salaries (\$30.81).

⁷ \$41.57 = \$26.04 × 1.5966.

In total, ECD estimates existing elements of this information collection would result in 50 burden hours⁸ and \$2,071.52 in labor costs⁹ per year. These elements would result in 150 burden hours¹⁰ and \$6,214.55 in labor costs¹¹ over a 3-year period.

Table A.2: Estimated Annual Burden Hours and Costs for the Technical Assistance Request Form

Year	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (hours)	Total Time Burden (hours)	Average Hourly Compensation Rate	Total Labor Cost
1	47	2	0.42	39	\$41.57	\$1,628.11
2	47	2	0.42	39	\$41.57	\$1,628.11
3	47	2	0.42	39	\$41.57	\$1,628.11
Total	141			118		\$4,884.34

Note: Totals may not add due to rounding.

⁸ 50 burden hours per year = 39 burden hours per year for the Technical Assistance Request Forms + 11 burden hours per year for the Technical Assistance Evaluation Forms.

⁹ \$2,071.52 in labor costs per year = \$1,628.11 in labor costs per year for the Technical Assistance Request Forms + \$443.40 in labor costs per year for the Technical Assistance Evaluation Forms.

¹⁰ 150 burden hours over 3 years = 118 burden hours over 3 years for the Technical Assistance Request Forms + 32 burden hours over 3 years for the Technical Assistance Evaluation Forms.

¹¹ \$6,214.55 in labor costs per year = \$4,884.34 in labor costs over 3 years for the Technical Assistance Request Forms + \$1,330.20 in labor costs over 3 years for the Technical Assistance Evaluation Forms.

Table A.3: Estimated Annual Burden Hours and Costs for the Technical Assistance Evaluation Form

Year	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (hours)	Total Time Burden (hours)	Average Hourly Compensation Rate	Total Labor Cost
1	128	1	0.08	11	\$41.57	\$443.40
2	128	1	0.08	11	\$41.57	\$443.40
3	128	1	0.08	11	\$41.57	\$443.40
Total	384			32		\$1,330.20

Note: Totals may not add due to rounding.

Table A.4: Estimated Annualized Burden Hours and Costs

	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (hours)	Total Time Burden (hours)	Average Hourly Compensation Rate	Total Labor Cost
TA Request Form	47	2	0.42	39	\$41.57	\$1,628.11
TA Evaluation Form	128	1	0.08	11	\$41.57	\$443.40
Total	175			50		\$2,071.51

Note: Totals may not add due to rounding.

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 applying to participate in ECD events. As all forms are submitted via email, there are 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.

ECD estimates that on average, 94 Technical Assistance Request Forms are submitted per year and 128 Technical Assistance Evaluation Forms are submitted per year. ECD estimates that it would take a GS 13, Step 10 staff member 0.17 hours (10 minutes) to review each form.

To estimate the burden associated with reviewing the forms, ECD multiplies the number of submissions by the estimated time necessary to review a submitted form. As shown in Table A.4, ECD estimates that burden to review the submitted Technical Assistance Request Forms amounts to 16 hours per year¹² and 47 hours over a 3-year period. As shown in Table A.5, ECD estimates that burden to review the submitted Technical Assistance Evaluation Forms amounts to 21 hours per year¹³ and 64 hours over a 3-year period.

To estimate the labor costs for the staff reviewing the submitted forms, ECD uses the average hourly compensation rate for GS 13, Step 10 staff from the DC area. ECD uses Office of Personnel Management (OPM) data that show the average hourly wage rate for a GS, Step 10 staff member from the DC area is \$59.05.¹⁴ To account for benefits, ECD multiplies this hourly wage rate by a compensation factor of 1.6919¹⁵, which is the ratio of total compensation to wages for federal employees. The average hourly compensation rate is \$99.91.¹⁶

¹² 16 hours per year = 94 forms per year × 0.17 hours per form.

¹³ 21 hours per year = 128 forms per year × 0.17 hours per form.

¹⁴ OPM. Pay & Leave: Salaries & Wages. Salary Table 2017-DCB. Incorporating the 1% General Schedule Increase and Locality Payment of 27.10% for the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA. Effective January 2017. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/DCB_h.aspx. The hourly wage for GS 13, Step 10 staff member is \$59.05.

¹⁵ Congressional Budget Office (CBO). Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015. April 2017. <https://www.cbo.gov/publication/52637>. CBO reports that for federal workers (for all levels of education), the average hourly total compensation rate was \$64.80 and the average hourly wage rate was \$38.30 between 2011 and 2015. To estimate the compensation factor of 1.6919, FPS divides the average hourly total compensation rate (\$64.80) by the average hourly wage rate (\$38.30).

¹⁶ \$99.91 = \$59.05 × 1.6919.

To estimate the labor cost for Federal staff to review the submitted forms, ECD multiplies the total annual time burden by the average hourly compensation rate. As shown in Table A.4, ECD estimates the labor cost to review the submitted Technical Assistance Request Forms amounts to \$1,565.21 per year and \$4,695.63 over a 3-year period. As shown in Table A.5, ECD estimates that labor cost to review the submitted Technical Assistance Evaluation Forms amounts to \$2,131.35 per year and \$6,394.05 over a 3-year period.

In total, ECD estimates existing elements of this information collection would result in 37 burden hours¹⁷ and \$3,696.56 in labor costs¹⁸ per year. These elements would result in 111 burden hours¹⁹ and \$11,089.68 in labor costs²⁰ over a 3-year period.

Table A.5: Estimated Annual Federal Government Burden Hours and Costs for the Technical Assistance Request Form

Year	Number of Responses	Average Burden per Response (hours)	Total Time Burden (hours)	Average Hourly Compensation Rate	Total Labor Cost
1	94	0.17	16	\$99.91	\$1,565.21
2	94	0.17	16	\$99.91	\$1,565.21
3	94	0.17	16	\$99.91	\$1,565.21
Total	282		47		\$4,695.63

Note: Totals may not add due to rounding.

Table A.6: Estimated Annual Federal Government Burden Hours and Costs for the Technical Assistance Evaluation Form

Year	Number of Responses	Average Burden per Response (hours)	Total Time Burden (hours)	Average Hourly Compensation Rate	Total Labor Cost
1	128	0.17	21	\$99.91	\$2,131.35
2	128	0.17	21	\$99.91	\$2,131.35
3	128	0.17	21	\$99.91	\$2,131.35
Total	384		64		\$6,394.05

Note: Totals may not add due to rounding.

¹⁷ 37 burden hours per year = 16 burden hours per year for the Technical Assistance Request Forms + 21 burden hours per year for the Technical Assistance Evaluation Forms.

¹⁸ \$3,696.56 in labor costs per year = \$1,565.21 in labor costs per year for the Technical Assistance Request Forms + \$2,131.35 in labor costs per year for the Technical Assistance Evaluation Forms.

¹⁹ 111 burden hours over 3 years = 47 burden hours over 3 years for the Technical Assistance Request Forms + 64 burden hours over 3 years for the Technical Assistance Evaluation Forms.

²⁰ \$11,089.68 in labor costs per year = \$4,695.63 in labor costs over 3 years for the Technical Assistance Request Forms + \$6,394.05 in labor costs over 3 years for the Technical Assistance Evaluation Forms.

Table A.7: Total Estimated Annualized Federal Government Burden Hours and Costs

	Number of Responses	Average Burden per Response (hours)	Total Time Burden (hours)	Average Hourly Compensation Rate	Total Labor Cost
TA Request Form	94	0.17	16	\$99.91	\$1,565.21
TA Evaluation Form	128	0.17	21	\$99.91	\$2,131.35
Total	222		37		\$3,696.56

Note: Totals may not add due to rounding.

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.

The changes to the collection since the previous OMB approval include: updating the web address, adding a submit button to the forms, decreasing the estimated number of responses, decreasing the burden time, and increasing the cost estimates.

The web address, which houses the forms, has been updated from www.publicsafetytools.info to <https://www.dhs.gov/ictapscip-resources>. A submit button was added to each form to offer an easier way for respondents to submit the completed forms electronically. There has been no change to the data collected on the forms.

The decrease in the overall average annual burden and costs to respondents is a result of change in the agency estimates after a review of historical data collected. The Department has also updated the wages and compensation factors used to calculate the burden to both the respondents and the government.

For the Technical Assistance Request Form, the estimated annual number of responses increased from 56 to 94. This adjustment results in an increase in the annual burden to respondents by 16 burden hours and an increase in the annual burden to the government by 7 burden hours.

For the Technical Assistance Evaluation Form, the estimated annual number of responses decreased from 2,000 to 128. The estimated burden time per response decreased from 25 minutes to 5 minutes. These adjustments result in a decrease in the annual burden to respondents by 829 burden hours and a decrease in the annual burden to the government by 299 burden hours.

As result of all the changes, the total annual burden estimates for the collection decreased by 814 annual burden hours and \$22,927.39 in annual burden cost for respondents. For the government, the annual burden hours decreased by 292 hours and the annual government cost decreased by \$14,730.73.

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.

This information collection will not be published for statistical purposes.

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 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.

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