

Supporting Statement for Paperwork Reduction Act Submissions

Title: Communications Assets Survey and Mapping (CASM) Tool

OMB Control Number: 1670-NEW

Supporting Statement A

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Department of Homeland Security (DHS) Cybersecurity and Infrastructure Security Agency (CISA) Emergency Communications Division (ECD), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 571 et seq., as amended, is required, pursuant to 6 U.S.C. § 572, to develop and maintain the Nationwide Emergency Communications Plan (NECP). The vision of the NECP is to ensure emergency response personnel can communicate as needed, on demand, and as authorized. To achieve this vision, ECD provides the Communications Assets and Survey Mapping (CASM) tool. The CASM tool is the primary resource nationwide for the emergency communications community to inventory and share asset and training information for the purpose of planning public safety communications operability and interoperability.

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.

DHS provides the Communications Assets Survey and Mapping (CASM) Tool as a secure and free nationwide database to contain communications capabilities for use by Federal, State, Local, Territorial, and Tribal (SLTT) emergency personnel. CASM allows Federal employees and SLTT Statewide Interoperability Coordinators (SWIC) to inventory emergency communication equipment and resources. The information entered is voluntary and used by SWIC to support tactical planning and coordination during emergencies. DHS does not utilize the information entered into CASM. DHS only provides, maintains, and stores the information entered in the CASM database and only has administrative access to the information entered.

CASM Registration

To get access to the CASM Tool, users click on the “Request New Access” link on the CASM login page (<https://casm.dhs.gov/>). The registration requires that users enter their name, contact information, reason for their access request, type of data to access, and access level. Once entered, the access request is routed to their organization’s approving authority. Once the organization’s approving authority vets and authorizes the access request, the user account is automatically created and users are notified via an auto-generated email.

CASM Modules

The CASM consists of voluntary modules related to the different types of capabilities. There is a module for Assets, which contains information about emergency equipment, the equipment capabilities and location. There is a Personnel module, which contains personnel name, contact information and information about their Communications Unit (COMU) training. The Personnel module allows SWICs to tracking their personnel's COMU training.

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 information is collected via electronic means. The CASM registration and database tool is available online via <https://casm.dhs.gov/>. Users can also access and enter information via the CASM Resource Finder mobile app.

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 provide this database, emergency personnel will not be able to share inventory of emergency equipment and assets, which reduces the ability to prepare for, communicate and respond during emergencies.

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>	Thursday, April 18, 2019	84	75	16276	0
<i>30-Day Federal Register Notice</i>	Friday, August 2, 2019	84	149	37906	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) and SORN – DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (Nov. 27, 2012).

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:

- 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.
- 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.
- 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.

DHS estimates that stakeholders (i.e., SLTT emergency personnel including police, fire, EMS, emergency managers, dispatchers, radio operators, government workers, etc.) enter equipment and training capabilities into the CASM tool. Each SLTT appoints a single point of contact for emergency response coordination called a Statewide Interoperability Coordinator (SWIC).

Therefore, it estimated that there can be a total of 56 respondents for the CASM registration and tool.

DHS estimates that it takes a SWIC approximately 0.08 hours (5 minutes) to complete the request to register for the CASM tool. DHS estimated the total time required to enter information into the CASM modules is approximately 0.5 hours (30 minutes) per submission.

To estimate the labor costs for the respondents (including stakeholders and SWICs), DHS uses the average hourly compensation rate for State and local government workers. DHS used Bureau of Labor Statistics (BLS) data to estimate the average hourly wage rate for State and local government staff for all occupations.¹ The weighted average hourly wage rate for State and local government workers is \$26.04.² To account for benefits, DHS multiplies this average hourly wage rate by a compensation factor of 1.5966³, which is the ratio of total compensation to salaries and wages. The average hourly compensation rate is \$41.57.⁴

Therefore, the total annual burden associated with the proposed elements of this collection is 0.58 hours (35 minutes) per response. For an estimated 56 respondents, the burden is 341 hours per year. At a rate of \$41.57 per hour, the dollar value of the total annual burden hours associated with the existing elements of this information collection equals \$14,161.

Table A.12: Estimated Annualized Burden Hours and Costs

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (hours)	Total Annual Burden (hours) D = A × B × C	Average Hourly Compensation Rate	Total Annual Respondent Cost
	A	B	C=A x B	C		E	F = D × E
CASM Registration	56	1	56	0.08	5	\$41.57	\$193.99
CASM Modules	56	12	672	0.5	336	\$41.57	\$13,967.14
Total	56		728		341		\$14,161.13

Note: Totals may not add due to rounding.

¹ 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.

² \$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).

³ 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).

⁴ \$41.57 = \$26.04 × 1.5966.

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 recordkeeping, capital, start-up, or maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The annual cost of this collection to the Federal Government is estimated to be \$2.2 million. The annual cost of this collection is based on the CASM-related portion of the overall contract for Technical Assistance (TA) program. Approximately 12 percent of the TA contract provides funding for the CASM Help Desk and CASM Database Maintenance.

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 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.

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.