

Supporting Statement for Paperwork Reduction Act Submissions

Title: SAFECOM Membership Questionnaire

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.

Response...

On November 16, 2018, Congress passed Public Law 115–278, to amend the Homeland Security Act of 2002 (6 U.S.C. 101 et seq.), enacted and authorized the Cybersecurity and Infrastructure Security Agency (CISA) of the Department of Homeland Security (DHS). Statue 4173 §(f)(3) under title XVIII mandated CISA to construct the Emergency Communications Division as one of three components. Furthermore, Statue 4173 §(f)(3) calls for the Emergency Communications Division to be headed by the Assistant Director. Statue 4175 §(c)(1)(2) (6 U.S.C. 571 note.) re-designated the Office of Emergency Communications to become the Emergency Communications Division, headed by the Assistant Director. In accordance with Statue 4179 §1801 (6 U.S.C. 571)(b) title XVIII, the Assistant Director for the Emergency Communications Division is required to report to the Director of CISA. Section 2202 (6 U.S.C. 652)(b)(1) specifies for the head of CISA to be re-designated as the Director, who is required to report to the Secretary of the Department of Homeland Security.

CISA enhances public safety interoperable communications at all levels of government to help partners across the country develop their emergency communications capabilities. Working with stakeholders across the country, CISA conducts extensive, nationwide outreach to support and promote the ability of emergency response providers and relevant government officials to continue to communicate in the event of a natural disaster, act of terrorism, or other man-made disaster. Public Law 109-296, Title VI, §671(b), Title XVIII, §1801(c)(2) mandates DHS through CISA to administrate and manage SAFECOM, a state, local, tribal, and territorial stakeholder-driven public safety communications program. In an effort to resolve major communications issues identified during the September 11, 2001, terrorist attacks, SAFECOM was created as a Presidential E-Government Initiative to improve interoperability, allowing emergency responders to communicate more effectively before, during, and after emergencies and disasters.

Through collaboration with emergency responders and elected officials across all levels of government, SAFECOM works to improve emergency response providers' inter-jurisdictional and interdisciplinary emergency communications interoperability across local, regional, tribal, State, territorial, international borders, and with Federal government entities. SAFECOM works with existing Federal communications programs and key emergency response stakeholders to address the need to develop better technologies and processes for the coordination of existing communications systems and future networks.

The SAFECOM Membership Questionnaire is an internal SAFECOM document disseminated only to active SAFECOM Members. SAFECOM uses the Questionnaire to identify membership gaps, obtain updated information on SAFECOM's membership body (e.g., public safety communications experience, accolades, acquired skills/certifications, etc.), update SAFECOM marketing materials, and to assist SAFECOM when responding General Accounting Office (GAO) inquiries.

6 U.S.C. §652 (c)(1) requires the Director to lead cybersecurity and critical infrastructure security programs, operations, and associated policy for the CISA, including national cybersecurity asset response activities.

6 U.S.C. §652 (c)(2) requires the DHS Secretary through the CISA Director to coordinate with Federal entities, including Sector-Specific Agencies, and non-Federal entities, including international entities, to carry out the cybersecurity and critical infrastructure activities of the Agency.

6 U.S.C. §652 (c)(10) requires DHS through CISA to carry out cybersecurity, infrastructure security, and emergency communications stakeholder outreach and engagement and coordinate that outreach and engagement with critical infrastructure Sector-Specific Agencies.

These authorities in addition to DHS's responsibilities through Executive Order 13618 in the area of national security and emergency providers' communications require a renewed examination periodically by SAFECOM to ensure its membership is indicative of the national public safety communications community.

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.

Response...

The DHS/CISA/ECD will disseminate the SAFECOM Membership Questionnaire to active SAFECOM Members as a fillable PDF document. SAFECOM intended to use the Questionnaire to examine its Membership body, identify membership gaps obtain updated information on SAFECOM's membership body (e.g., public safety communications experience, accolades, acquired skills/certifications, etc.), update SAFECOM marketing materials, and to assist SAFECOM when responding General Accounting Office (GAO) inquiries.

SAFECOM is one of the first organizations to bring together elected and appointed officials, representatives from public safety associations, and emergency responders in the field to

promote governance, best practices, and lessons learned related to emergency communications. It is imperative for SAFECOM's Membership to consist of public safety communications stakeholders representing all public safety disciplines, jurisdictions, and

SAFECOM has created key documents such as the Interoperability Continuum, the Statement of Requirements (SoR) for baseline communications and interoperability standards, the Statewide Communication Interoperability Plan (SCIP) Methodology, and the National Emergency Communications Plan (NECP) to assist emergency responders nationwide with improving communications and interoperability. SAFECOM's accomplished, diverse, and knowledgeable Membership was critical in the development and promotion of the aforementioned documents; providing public safety practitioner oversight, expertise, guidance, and best practices.

The Questionnaire will encompass eight interdependent sections of questions. The SAFECOM Internal Membership section requests each Member to provide their name, state of residence, and the number of hours per month he/she contributes SAFECOM led initiatives (e.g., conference calls and deliverable development). SAFECOM consists of public safety association representatives and at-large members. The Association Representative Information section pertains to public safety associations represented in SAFECOM. Association Representatives serving in SAFECOM are asked to provide the name of their Association, approximate Association size, Association contact, and addition Association point-of-contact (POC) information. At-large members are instructed to skip to the next section. Public Safety Service section will focus on questions related to each Member's public safety and first responder career. Members are asked to designate their current public safety status (i.e., active, retired, other), to identify their public safety discipline(s), to provide level of government for current employment (e.g., state, local, tribal, territorial, federal), to provide years of service, to list current agency and agency's contact information, to provide a brief description on their current role and responsibilities, to select the population range that best describes the population of your current organization's jurisdiction serviced, to indicate the number of public safety personnel employed at your current organization, to indicate the number of responses your current organization responds to each year, and if current position entails collaborating with Tribal Nations. The Volunteer Experience section asks Members to provide details on their volunteer experience. The Public Safety Experience section asks Members to identify the public safety events he/she responded to throughout their career, and to identify the communications technology he/she has used. The Education section focuses on the education (e.g., which is an optional question), proficiencies, and professional certifications. External Conference Attendance section focuses on Member's experience at public safety conferences as well as their interest in representing SAFECOM in the future at a conference. The final section focuses on Members public safety usage.

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.

Response...

CISA intends to allow electronic submission to reduce the burden on respondents including the use of an Adobe PDF-fillable form which can be returned via email to SAFECOMGovernance@hq.dhs.gov or uploaded to the Homeland Security Information Network (HSIN), and a paper copy that will be mailed directly to the respondent(s) requesting a hard copy and returned either via a prepaid envelope through the U.S. Postal Service to DHS – CISA, ATTN: Robert Rhoads c/o Ralph Barnett III, 245 Murray Lane, SW, Mailstop 0613, Washington, DC 20598-0613; scanned and emailed to SAFECOMGovernance@cisa.dhs.gov; and/or faxed to CISA ECD – , ATTN: Ralph Barnett III at (703) 705-6130. We anticipate that less than 1% of respondents will request a paper version of the survey, which is about 1-2 surveys.

4. Describe efforts to identify duplication. In Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Response...

There was a predecessor Questionnaire completed by SAFECOM Members in 2016. SAFECOM Membership body has changed significantly since the previous Questionnaire. This includes the addition of new At-Large and Association Members, the addition of Tribal representation, Membership's public safety experience and expertise, as well as other differences due to changing landscape in the field of emergency communications. Thus, new goals, metrics and collection requirements make prior collection tools inadequate for current needs.

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.

Response...

This collection will impact state, local, territorial, and tribal public safety responders and officials. Use of electronic submission should assist in minimizing impact of said 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.

Response...

DHS/CISA has a statutory requirement to conduct this collection. Failure to do so will result in non-compliance with the law. The collection of data from the surveys will inform the next iteration of the SAFECOM developed guidance products and initiatives which lays the groundwork for emergency communications planning nationwide. The Questionnaire will aid in prioritizing programmatic and strategic planning needs for federal, state, local and tribal public safety agencies.

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>	September 25, 2020	85	187	60483	Three comments from two commenters were received.
<i>30-Day Federal Register Notice</i>	March 23, 2021	86	54	15488	No comments

A 60-day public notice for comments was published in the *Federal Register* on September 25, 2020 at 85 FR 60483.¹ In response, three comments from two commenters were received. Two were not germane to the collection of information and the third requested additional information regarding SAFECOM available at <https://www.cisa.gov/safecom>.

A 30-day public notice for comments was published in the *Federal Register* on March 23, 2021 at 86 FR 15488.² In response, there were no comments.

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.

There are no assurances of confidentiality.

This collection is affected by the Privacy Act and is covered by a Privacy Impact Assessment (PIA) and Systems of Records Notice (SORN).

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.

To estimate the burden associated with this collection, CISA multiplies the number of responses and the estimated time needed to respond. Based on subject matter expert elicitation, CISA estimates that there will be approximately 50 total submissions by SAFECOM members, 25 of which will be from SLTT stakeholders and 50 from private sector stakeholders. Each submission

¹ The 60-day notice may be viewed at <https://www.govinfo.gov/content/pkg/FR-2020-09-25/pdf/2020-21188.pdf>

² The 30-day notice may be viewed at <https://www.govinfo.gov/content/pkg/FR-2021-03-23/pdf/2021-05954.pdf>

is estimated to take approximately 15 minutes. To estimate the total compensation rate for each set of respondents, the average hourly wage is multiplied by a benefits multiplier of 1.425.³ The SLTT respondent’s average hourly compensation rate of \$71.71 is based on an average hourly wage rate of \$50.31⁴ multiplied by 1.425. The private sector average hourly compensation rate of \$85.89 is based on an average hourly wage rate of \$60.26⁵ multiplied by 1.425. To estimate the cost, we apply a fully loaded hourly compensation rates for each population to the time required to file a submission.

As shown in Table 2, the estimated cost associated with reporting is \$985.

Table 2: Burden Estimate

Type of Respondent	Number of Respondents	Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Cost
SLTT	25	1	0.25	6.3	\$71.71	\$448.16
Private Sector	25	1	0.25	6.3	\$85.89	\$536.80
Total	50			12.5		\$984.96

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.)

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.

³ BLS. Employer Costs for Employee Compensation – March 2020. Table 1. Employer Costs per Hour Worked for Employee Compensation and Costs as a Percent of Total Compensation: Civilian Workers, by Major Occupational and Industry Group, December 2019. <https://www.bls.gov/news.release/pdf/ecec.pdf> The compensation factor (1.425) is estimated by dividing total compensation (\$34.73) by wages and salaries (\$24.36).

⁴ Bureau of Labor Statistics (BLS). Occupational Employment Statistics. May 2019. Federal, state, and local government, including government-owned schools and hospitals and the U.S. Postal Service, Management Occupations (SOC 11-0000). <https://www.bls.gov/oes/2019/may/999001.htm#00-0000>

⁵ Bureau of Labor Statistics (BLS). Occupational Employment Statistics. May 2019. Cross Industry, Private Ownership Only, Management Occupations (SOC 11-0000). <https://www.bls.gov/oes/2019/may/000001.htm>

CISA estimates the burden on the government of this collection by estimating the time required for CISA personnel to review the submissions. All reports will be reviewed by a GS-14. The burden of the GS labor is estimated by multiplying the fully loaded hourly compensation rate of the employee by the number of hours to review. CISA estimates it will take 15 minutes for each review. The hourly rate for a GS-14, Step 3 is \$66.10⁶, which is multiplied by the load factor of 1.425 for a loaded compensation rate of \$94.21. As shown in Table 3 the estimated cost to the Federal Government is \$1,178.

Table 3: Government Burden

Cost Category	Number of Respondents	Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Cost
GS-14	50	1	0.25	12.5	\$94.21	\$1,177.67

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 **NEW** collection of information.

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.

CISA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

CISA 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.

⁶ GS pay rates are from The annual salary for a GS-14 Step 3 is \$137,491, which is divided by 2080 to obtain the hourly rate. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx>

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