

## **Supporting Statement for Paperwork Reduction Act Submissions**

**Title: SAFECOM Nationwide Surveys Generic Clearance**

**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...*

In 2006, Congress passed Public Law 109-295, which included SEC. 671. EMERGENCY COMMUNICATIONS also known as the ‘21st Century Emergency Communications Act of 2006’. The legislation established the Department of Homeland Security (DHS) Office of Emergency Communications, which was re-designated in 2018 as the Emergency Communications Division (ECD) within the Cybersecurity and Infrastructure Security Agency (CISA), to lead the development and implementation of a comprehensive approach to advancing national interoperable communications capabilities.

The following responsibilities were established:

6 U.S.C. §571(c) requires the DHS Secretary through the ECD Assistant Director to:

(4) conduct 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 natural disasters, acts of terrorism, and other man-made disasters;

(13) develop and update periodically, as appropriate, a National Emergency Communications Plan under section 572 of this title;

(14) perform such other duties of the Department necessary to support and promote the ability of emergency response providers and relevant government officials to continue to communicate in the event of natural disasters, acts of terrorism, and other man-made disasters; and

(15) perform other duties of the Department necessary to achieve the goal of and maintain and enhance interoperable emergency communications capabilities

6 U.S.C. § 572(a) requires the Secretary in cooperation with State, local, and tribal governments, Federal departments and agencies, emergency response providers, and the private sector, develop not later than 180 days after the completion of the baseline assessment under section 573 of this title, and periodically update, a National Emergency Communications Plan.

Lastly, 6 U.S.C. § 573 requires the DHS Secretary to conduct an assessment of Federal, State, local, and tribal governments that defines the range of capabilities needed by emergency response providers and relevant government officials, assesses the current available capabilities to meet such communications needs; identify the gaps between such current capabilities and defined requirements; at least every five years.

These authorities in addition to DHS responsibilities through Executive Order 13618 in the area of national security/emergency providers' communications require a continuous examination of nationwide emergency communications capabilities.

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...*

To meet the statutory requirements of 6 U.S.C. § 573, ECD is mandated to conduct the SAFECOM Nationwide Survey every 5 years to assess evolving capability needs and gaps and track progress against policy initiatives; status of strategic plans; and major industry or market shifts affecting the emergency communications capability.

SAFECOM Nationwide Survey:

CISA ECD will conduct a web-based survey entitled the SAFECOM Nationwide Survey, hereinafter referred to as the SNS. The purpose of the survey is to gather information to assess available emergency communications capabilities and identify gaps and needs for emergency response providers to effectively communicate during all types of natural or man-made hazards. CISA ECD will use the information collected to complete a statutorily mandated assessment and share the data with all stakeholders that have a role in emergency communications. In order to ascertain this information, the SNS will deploy four similar surveys across the nation to various emergency response disciplines at each level of government - federal, state, territorial, tribal, and local. The survey will solicit responses regarding issues affecting the public safety community to determine a jurisdiction's level of operability, interoperability and continuity and thus their overall emergency communications capability level. CISA ECD will analyze the data collected from this general survey to identify major gaps and themes affecting emergency communications across levels of government. Additionally, this analysis informs the development of supplemental surveys tailored to specific needs across the public safety community, as well as future iterations of the Nationwide Baseline Communications Assessment (NCBA) and National Emergency Communications Plan (NECP).

SAFECOM Supplemental Surveys:

CISA ECD will conduct SAFECOM supplemental surveys. The surveys can be conducted as focus groups, in-person interviews, web- and paper-based. CISA ECD will use the information collected to complete statutorily mandated requirements (6 U.S.C. §571(c), 572(a), and 573) and will share the data with all stakeholders with a role in emergency communications. In order to ascertain this information, the SAFECOM supplemental surveys will deploy topic-specific or targeted surveys across the nation to various emergency response disciplines at each level of government: federal, state, territorial, tribal, and local. The surveys solicit responses regarding targeted issues affecting all public safety, emergency response communities and/or specific subsets of the SNS population. CISA ECD will analyze the data collected from these supplemental surveys to identify changing requirements, mitigate risks, and inform the data collected from the 5-year Nationwide Survey.

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...*

ECD will use electronic submission to reduce the burden on respondents including web-based surveys and assessment tools, such as Survey Monkey. Its target audience – mainly first responders -is frequently interrupted, have variable schedules, and frequently work long hours. Electronic submission provides a more user-friendly interface, provides anonymity to the users, ensures the maximum response rate, eliminates paper, printing, and postage costs along with the need for data entry.

We will also utilize alternative submission methods for both the SNS and the supplemental surveys. An Adobe PDF-fillable form which can be returned via email to [sns@cisa.dhs.gov](mailto:sns@cisa.dhs.gov), direct emails with questionnaires attached, an in-person surveys, focus-groups, and a paper copy that will be mailed directly to the respondent(s) requesting a hard copy. The paper copy can be returned either via a prepaid envelope, scanned and emailed to [sns@cisa.dhs.gov](mailto:sns@cisa.dhs.gov), and/or faxed to CISA ECD. We anticipate that .5% of respondents will utilize these alternative submission methods.

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.

*Response...*

A search of reginfo.gov revealed, three other interoperability surveys. The first was the previous Office of Emergency Communications SAFECOM Nationwide Survey and is set to expire in October 2020. The frequency and complexity of emergencies are on the rise during a time when technology is advancing at a faster pace than any other time in history. In order to perform ECD's statutory regulations, it is important to understand the continuously changing requirements of emergency response providers and government officials at all levels of government, evolving risks, and the public safety community's ability to integrate new technologies while also preparing for emergent technologies. As a result, CISA is not renewing the existing clearance and submitting a request for a Generic Clearance to allow for greater flexibility to meet its statutory requirements.

The second was conducted by DHS Science and Technology (S&T) and expired in 2007. The subject matter of the SAFECOM surveys differs from the S&T collection because of technological, policy, and governance changes in the field of emergency communications. Thus, new goals, metrics and collection requirements make prior collection tools inadequate for current needs.

The final survey was conducted by the Department of Justice (DOJ) and expired in 2010. The DOJ survey focused on assessing the effectiveness of their Interoperable Communications Technology Program (ICTP) Grants. The SAFECOM surveys differ from the DOJ survey in that it accesses interoperability capabilities not the ITCP grants.

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 local and tribal first responders. 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...*

ECD has a statutory requirement to conduct the SNS. Failure to do so will result in non-compliance with the law. The collection of data from the SNS and the supplemental surveys will inform the next iteration of the NECP which lays the groundwork for emergency communications planning nationwide. The assessment will aid in prioritizing programmatic and funding needs for federal, state, territorial, 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.

*Response...*

- a. The special circumstances contained in item 7 a. of the Supporting Statement are not applicable to this information collection.
- b. It is anticipated that respondents will have an excess of a month to complete it.
- c. The special circumstances contained in item 7 c. of the Supporting Statement are not applicable to this information collection.
- d. The special circumstances contained in item 7 d. of the Supporting Statement are not applicable to this information collection.
- e. The special circumstances contained in item 7 e. of the Supporting Statement are not applicable to this information collection.
- f. The special circumstances contained in item 7 f. of the Supporting Statement are not applicable to this information collection.
- g. To avoid triggering privacy concerns the survey will be conducted on an anonymous basis. The aggregate data will be available to other agencies upon request.
- h. This collection will not require responders to submit proprietary trade secrets and other confidential information.

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.

*Response...*

	Date of Publication	Volume #	Number #	Page #	Comments Addressed
<i>60-Day Federal Register Notice:</i>	February 17, 2021	86	30	9948	No comments
<i>30-Day Federal Register Notice:</i>	June 23, 2021	86	118	32958	No comments

ECD will work with the SAFECOM organization, with which it has a statutory role; the National Council of Statewide Interoperability Coordinators (NCSWIC), and other relevant stakeholder associations. ECD will utilize regular SAFECOM and NCSWIC meetings, which it hosts, and other available opportunities for this purpose.

A 60-day public notice for comments was published in the *Federal Register* on February 17, 2021 at 86 FR 9948.<sup>1</sup> In response, there were no comments.

A 30-day public notice for comments was published in the *Federal Register* on June 23, 2021 at 86 FR 32958.<sup>2</sup> 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.

*Response...*

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.

*Response...*

There are no assurances of confidentiality provided to the respondents for this information collection. This collection is not privacy sensitive, since there is no Personally Identifiable Information (PII) collected or retrieved. Therefore, this collection is not impacted by the Privacy Act and does not require a Privacy Impact Assessment (PIA) or System of Records Notice (SORN).

<sup>1</sup> The 60-day notice may be viewed at <https://www.govinfo.gov/app/details/FR-2021-02-17/2021-03105>

<sup>2</sup> The 30-day notice may be viewed at <https://www.govinfo.gov/app/details/FR-2021-06-23/2021-13111>

No questions will be asked that may jeopardize the privacy of any respondent. Respondents will remain anonymous throughout the collection. Therefore, this collection is not impacted by the Privacy Act.

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.

*Response...*

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

*Response...*

ECD is required by statute (6 U.S.C. § 573) to conduct an assessment on state, local, and tribal governments that defines the emergency communications needs for emergency response providers and relevant government officials and continuously gauge the evolving state of the capability. Therefore, the respondent's universe will include:

- o State/Territorial Level government entities/agencies that have a role in emergency response, federally recognized Tribal Nations, and first responder entities, to include law enforcement, fire, emergency medical service, public safety answer point(s), and emergency management at the local level of government across the United States and Territories
- o ECD has calculated the information collection's population universe as a whole to be 67,335. *Broken down per the following:*
  - State/Territories=1,913 (56 states, territories and District of Columbia. Responses are counted for each targeted discipline plus field offices with an emergency response component)
  - Tribal Nations=574<sup>3</sup>

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<sup>3</sup> Source: U.S. Department of Interior. Bureau of Indian Affairs. Website: <https://www.federalregister.gov/documents/2020/01/30/2020-01707/indian-entities-recognized-by-and-eligible-to-receive-services-from-the-united-states-bureau-of>

- Local=64,848 (The population data source for the local level is the National Public Safety Information Bureau Database,<sup>4</sup> whose directories contain comprehensive listings for law enforcement, fire, EMS agencies and public safety answering points in the 50 U.S. states and the District of Columbia. Additionally, the Homeland Infrastructure Foundation-Level Data [HIFLD] was used for emergency management agencies in the 50 U.S. states and territories, plus law enforcement, fire, EMS agencies and public safety answering points in the U.S. territories)
- o ECD estimates the total number of respondents to be 41,989. Our estimates per level of government are broken down as follows:

Level of Government	Number of Respondents
State/Territories	1,913
Tribal Nations	574
Local	29,502
Supplemental Surveys	10,000
<b>Total</b>	<b>41,989</b>

- o Total Frequency of Response: Once every five years (6 U.S.C. § 573 requires DHS through the ECD Assistant Director to conduct the survey no less than every five years)
- o Total Annualized number of respondents:  $41,989/5 = 8,397.8$  rounded up to 8,398 respondents per year
- o Total Annual hour burden:  $8,398 \times 0.5$  (30 minutes equals 0.5 hours) = 4,199 hours burdened per year (the time burden of 30 minutes is based on the 2018 SAFECOM Nationwide Survey).

DHS will be using the formula: **(Mean Hourly Wage Rate) x (Benefit Multiplier)**

This formula determines the mean, fully loaded hourly wage rate for each discipline. To do this, ECD counted the total number of agencies/departments that aligned to each discipline across the population universe to determine the portion/percentage of the 67,335 *that should be aligned to each discipline for the purposes of determining the overall burden*. The total number of agencies /departments ECD used were data set entries listed by the Bureau of Indian Affairs, the National Public Safety Information Bureau, and HIFLD plus the 1,913 state/territorial-level disciplinary responses:

Discipline	Percentage of Population
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<sup>4</sup> Source: [National Public Safety Information Bureau Database](http://www.safetysource.com/lists/): Website: <http://www.safetysource.com/lists/>

Law Enforcement	28%
Fire	47%
Emergency Medical Services	8%
Public Safety Answering Points	8%
Emergency Management	9%

For the purposes of these calculations, DHS is using data from the Bureau of Labor Statistics (BLS) regarding the Mean Hourly Wage rate for each discipline. The Benefit Multiplier was designated as 1.425 for each discipline. The source-compensation factor is calculated using the BLS Economic News Release with March 2020 data on Employee Compensation. Accordingly, the source-compensation factor was derived by applying the following formula: Total compensation divided by Wages and salaries = compensation factor (i.e. \$34.72 total compensation ÷ \$24.36 in wages and salaries = 1.4252 compensation factor).

In addition, as example to illustrate how the multiplier is applied to a public safety discipline specifically, the fully loaded hourly wage rate for a Fire Department member is \$37.44 (\$26.27 BLS base rate x 1.425 compensation factor = \$37.44<sup>5</sup>). This process is illustrated for all disciplines in [Table A.12](#), and information sources for base pay by public safety discipline are cited in footnotes 4, 5, 6, 7, and 8 below.

**Table A.12: Estimated Annualized Burden Hours and Costs**

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
Law Enforcement <sup>6</sup>	2351	1	0.5	1176	\$46.32	\$54,449.16
Fire Department <sup>7</sup>	3947	1	0.5	1974	\$37.44	\$73,887.84
Emergency Medical Service <sup>8</sup>	672	1	0.5	336	\$26.61	\$8,940.96
Public Safety Answering Points <sup>9</sup>	672	1	0.5	336	\$30.37	\$10,204.32
Emergency Management <sup>10</sup>	756	1	0.5	378	\$55.07	\$20,816.46
<b>Totals</b>	<b>8398</b>			<b>4199</b>		<b>\$168,298.74</b>

<sup>5</sup> Source: Bureau of Labor Statistics. *Firefighter Occupational Employment and Wages, May 2019*. Website: <https://www.bls.gov/oes/2019/may/oes332011.htm>

<sup>6</sup> Source: Bureau of Labor Statistics (2020). *Occupational Employment and Wages, May 2019 Police and Sheriff's Patrol Officers*. Website: <https://www.bls.gov/oes/2019/may/oes333051.htm> (\$32.50 \* 1.425=\$46.32)

<sup>7</sup> Source: Bureau of Labor Statistics (2020). *Occupational Employment and Wages, May 2019 Fire Fighters*. Website: <https://www.bls.gov/oes/2019/may/oes332011.htm> (\$26.27\*1.425=\$37.44)

<sup>8</sup> Source: Bureau of Labor Statistics (2020). *Occupational Employment and Wages, May 2019 Emergency Medical Technicians and Paramedics*. Website: <https://www.bls.gov/oes/2019/may/oes292041.htm> (\$18.67 \* 1.425=\$26.61)

<sup>9</sup> Source: Bureau of Labor Statistics (2020). *Occupational Employment and Wages, May 2019 Police, Fire, and Ambulance Dispatchers*. Website: <https://www.bls.gov/oes/2019/may/oes435031.htm> (\$21.21 \* 1.425=\$30.37)

<sup>10</sup> Source: Bureau of Labor Statistics (2020). *Occupational Employment and Wages, May 2019 Community Food and Housing, and Emergency and Other Relief Services, Management Occupations (11-0000)*. Website: [https://www.bls.gov/oes/current/naics4\\_624200.htm](https://www.bls.gov/oes/current/naics4_624200.htm) (\$38.64\*1.462=\$55.07)



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.

*Response...*

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.

*Response...*

Based on internal review, ECD personnel estimate that one GS-15, Step-7 will spend approximately 3 minutes (0.05 hours) per survey for design and administration; one GS-14, Step-4 will spend approximately 3 minutes per survey for design and administration; and one GS-13, Step-5 will spend approximately 5 minutes (0.08 hours) per survey for design and administration. In addition, one GS-13 will spend approximately 8 minutes (0.13 hours) for survey analysis.

The hourly rates for the Washington, DC locality were obtained from the FY 2020 federal General Schedule (GS). GS-13, Step-5 is  $\$116,353/2080=55.94 * 1.425 = \$79.73$  fully loaded

wage rate. GS-14, Step-5 is  $\$137,491/2080=66.10 \times 1.425 = \$94.21$  fully loaded wage rate. GS-15, Step-5 is  $\$161,730/2080=77.75 \times 1.425 = \$110.82$  fully loaded wage rate.<sup>11</sup>

The cost for Survey Monkey is \$1,020 for the duration of testing, administering, and analyzing the survey.

Total Estimated Annual Cost to the Government = **\$235,863**. This process is illustrated in [Table A.14](#).

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<sup>11</sup> Source: U.S. Office of Personnel Management. 2020. *Pay and Leave: Salaries and Wages 2020 General Schedule Washington-Baltimore-Arlington, DC-MD-VA-WV-PA*. Website: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf>.

**Table A.14: Annual Cost to the Government**

Cost Category	Hours for Design/ Administration per Survey	Hours per Survey Anal- ysis	Annual Number of Surveys	Total Annual Burden (hours)	Average Hourly Wage Rate	Total Annual Cost
GS-15	0.05	0	8398	420	\$110.82	\$46,535
GS-14	0.05	0	8398	420	\$94.21	\$39,560
GS-13	0.08	0.13	8398	1820	\$79.73	\$145,072
Survey Monkey	N/A	N/A	N/A	N/A	N/A	\$1,020
<b>Postal Service</b>	<b>Total Number of Paper Surveys (0.5% of the Total No. of Respondents Annu- alized)</b>	<b>Cost of Postage (Send and</b>	<b>Total</b>	<b>Printing Cost Per Survey (\$0.01 per sheet of paper in the survey)</b>	<b>Total Annual Printing Cost</b>	
United States Postal Service	42	\$15.84	\$665.28	\$0.29	\$12.18	\$677
	<b>Total Number of Post- cards (85% of the Total Number of Respondents Annualized)</b>	<b>Cost of Postage (Send 1 Postcard per Respon- dent)</b>	<b>Total An- nual Postage Cost</b>	<b>Printing Cost per Postcard</b>	<b>Total Annual Printing Cost</b>	
Government Printing Office	7138	\$0.35	\$2,498.30	\$0.07	\$499.66	\$2,998
<b>Total Cost</b>						<b>\$235,863</b>

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.

Response...

This is a **NEW** collection.

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.

Response...

If appropriate for public distribution (e.g., no sensitive information when aggregated, etc.), ECD will publish its reports resulting from collection through its website and, when required by statute, through direct distribution to Congress through the DHS Office of Legislative Affairs. ECD intends to utilize statistical sampling and analysis of emergency communications stakeholder community based upon region, locale size, jurisdiction, and other relevant factors.

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

*Response...*

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.

*Response...*

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