

Supporting Statement for Paperwork Reduction Act Submissions

Title: The Department of Homeland Security, Office of Emergency Communications

Interoperable Communications and Technical Assistance Program (ICTAP) Training Survey

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...

The National Emergency Communications Plan (NECP) is the Nation's over-arching strategic plan to drive measurable improvements in emergency communications across all levels of government and disciplines. First released in 2008, the plan is periodically updated to reflect the ongoing evolution of emergency communications technologies and processes. In support of the NECP, the Interoperable Communications and Technical Assistance Program (ICTAP) within the CISA Emergency Communications Division (ECD) provides a portfolio of no-cost communications technical assistance (TA) to support the implementation of the NECP, state's and territories' Statewide Communication Interoperability Plans (SCIPs), broadband planning, voice and digital network engineering, training, exercise support, and operational assessment focused on interoperable emergency communications at all levels of government. Technical assistance offered by the ICTAP supports all 56 states and territories and federally recognized Tribal Nations in helping solve a variety of communications interoperability issues, keeping up to date with new technologies, and enhancing governance policies and the management of Communications Unit (COMU) resources.

The purpose of the ICTAP Training Survey is to obtain anonymous feedback regarding several of the training courses offered by the ICTAP. The feedback and experience given by survey respondents will assist the ICTAP in improving, revising, and updating the course materials for future students. The three courses which the ICTAP would like to obtain feedback are for:

- Communications Unit Leader (COML);
- Communications Unit Technician (COMT); and
- Information Technology Service Unit Leader (ITSL)

COML is designed for all state/territory, tribal, regional, and local emergency response professionals and for support personnel with a communications background. It is designed to familiarize these professionals

with the role and responsibilities of a COML under the National Incident Management System (NIMS) Incident Command System (ICS) and to provide hands-on exercises that reinforce the lecture materials. CISA and FEMA Emergency Management Institute (EMI) offer this course jointly as “L0969, NIMS ICS All-Hazards Communications Unit Leader Course.” Under the NIMS ICS structure, a COML is the focal point within the Communications Unit. This course provides DHS-approved and NIMS-compliant instruction to ensure that every state/territory has trained personnel capable of coordinating on-scene emergency communications during a multi-jurisdictional response or planned event.

COML is designed for all state/territory, tribal, regional, and local emergency response professionals and for support personnel with a communications background. It is designed to familiarize these professionals with the role and responsibilities of a COML under the National Incident Management System (NIMS) Incident Command System (ICS) and to provide hands-on exercises that reinforce the lecture materials. CISA and FEMA Emergency Management Institute (EMI) offer this course jointly as “L0969, NIMS ICS All-Hazards Communications Unit Leader Course.” Under the NIMS ICS structure, a COML is the focal point within the Communications Unit. This course provides DHS-approved and NIMS-compliant instruction to ensure that every state/territory has trained personnel capable of coordinating on-scene emergency communications during a multi-jurisdictional response or planned event.

The COMT course provides introductory and refresher training for the NIMS ICS COMT position. It introduces public safety professionals and support staff to various communications concepts and technologies including interoperable communications solutions, LMR communications, satellite, telephone, data, and computer technologies used in incident response and planned events. It is designed for state/territory, tribal, urban, and local emergency response professionals and support personnel in all disciplines who have a technical communications background. Participants develop the essential core competencies required for performing the duties of the COMT in an all-hazards incident, including responsibilities while operating in a local, regional, or state-level All-Hazards Incident Management Team.

In 2018 and 2019, ICTAP introduced the ITSL course, and SAFECOM/National Counsel of Statewide Interoperability Coordinators (NCSWIC) have coordinated with FEMA National Integration Center (NIC) and other organizations focused on public safety communications to establish the best way to integrate the ITSL into the ICS. The ITSL is needed to provide information management, cybersecurity, and application management for the many critical incident/event related functions to include: Incident/Unified Command Post, Incident Communications Centers, and various tactical operations centers, joint information center (JIC), staging areas, and field locations. The ITSL course targets Federal, state/territory, tribal, urban, local, and emergency response professionals, and support personnel in all disciplines with a communications background and an aptitude for and extensive experience in information technology. Specifically, the training course provides an overview of the ITSL components including Communications/IT Help Desk or Unified Help Desk, IT Infrastructure Manager, Network Manager. It covers their roles and responsibilities and provides an in-depth overview with exercises for the ITSL’s major functions, to include ensuring reliable and timely delivery of IT services to participating agencies and officials.

The ICTAP Training Survey will not collect any personal identifiable information (PII) from respondents (emergency communications stakeholders) of the survey. In collecting feedback regarding the ITSL, COML, and COMT courses, the survey will collect what state the respondent lives, where they took the course, did the course provide the information needed, should the course curriculum be updated, and any comments to improve the course material.

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 conduct the Survey, a web-based survey. The purpose of the survey is to gather information from former students to assess and identify training gaps when updating the training. The DHS/CISA/ECD will use the information collected to help refresh and include new training information. In order to ascertain this information, the survey will deploy a survey to all former students across the nation addressing emergency response entities at each level of government: Federal, State and Territorial, Tribal, and local.

The survey will encompass 10 questions regarding the former student's experience, anything that they liked, disliked, or something new that they would like to see incorporated into the refreshed class.

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 intends to allow electronic submission to reduce the burden on respondents including web-based surveys and assessment tools i.e. Microsoft Forms. Our target audience, former students from across the country. Electronic submission will ensure the maximum response rate while also permitting respondents to complete the survey anonymously at a time of their own choosing.

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...

This is a one-time survey.

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 information collection does not have an impact on 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.

Response...

There are no consequences if DHS/CISA/ECD does not do this survey, but it would be great to have feedback from former students when updating the teaching material.

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 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 of the Supporting Statement are not applicable to this information collection.
- d. The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.
- e. The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.
- f. The special circumstances contained in item 7 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.

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.

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
60-Day Federal Register Notice:	February 19, 2021	86	32	10332	No Comments
30-Day Federal Register Notice:	June 23, 2021	86	118	32957	No Comments

ECD will work with around 300 former students for input on each new class for COMT, COML, and ITSL.

A 60-day public notice for comments was published in the *Federal Register* on February 19, 2021 at 86 FR 10332.¹ 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 32957.² 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.

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 for this collection. This collection is not affected by the Privacy Act and is not impacted by a PIA or SORN.

¹ The 60-day notice may be viewed at <https://www.govinfo.gov/app/details/FR-2021-02-19/2021-03404>

² The 30-day notice may be viewed at <https://www.govinfo.gov/app/details/FR-2021-06-23/2021-13107>

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...

It is estimated that it will take each participant 10 minutes to complete the training survey. For 300 respondents annually, the burden is 50 hours. To estimate the cost of this collection, CISA uses the mean hourly wage of “All Occupations” of \$25.72³. CISA then applies a load factor of 1.4597⁴ to this average wage to obtain a fully loaded average hourly wage of \$37.54. The total respondent cost burden for this collection is \$1,877 (50 hours x \$37.54).

Table A.12: Estimated Annualized Burden Hours and Costs

Instrument	Respondents	Responses per Respondent	Burden per Response (hours)	Total Burden (hours)	Loaded Compensation Rate	Cost
ITSL	100	1	0.166666667	17	\$37.54	\$625.72
COML	100	1	0.166666667	17	\$37.54	\$625.72

³ https://www.bls.gov/oes/2019/may/oes_nat.htm The selection of “All Occupations” was chosen as the expected respondents for this collection could be from any occupation.

⁴ Load factor based on BLS Employer Cost for Employee Compensation, as of June 2020 (released on September 17, 2020). Load factor = Employer cost for employee compensation (\$38.20) / wages and salaries (\$26.17) = 1.4597 <https://www.bls.gov/news.release/ecec.nr0.htm>

COMU	100	1	0.166666667	17	\$37.54	\$625.72
Total	300			50		\$1,877.16

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...

CISA estimates that it takes a GS-13 Step-5 approximately 10 minutes to review each submitted survey. The hourly basic rate for the Washington, DC locality was obtained according to General

Schedule (GS) for the Washington DC area. For a GS-13 Step-5, the annual wage is \$116,353,⁵ which we divide by 2,080 hours to obtain an hourly wage rate of \$55.94. The fully loaded wage rate using a 1.4597 multiplier is calculated as \$81.65.

For the GS-13 Step-5, with 20,000 respondents annually processing the Visitor Request form x 10 minutes for design and administration = 3,333 hours.

GS-13 Step 5: 50 x \$81.65= \$4,082.67

Total Cost to the Government = \$4,082.67

Instru- ment	Respondents	Responses per Re- spondent	Burden per Response (hours)	Total Burden (hours)	Loaded Gov- ernment Compensa- tion Rate	Cost
ITSL	100	1	0.166666667	17	\$81.65	\$1,360.89
COML	100	1	0.166666667	17	\$81.65	\$1,360.89
COMU	100	1	0.166666667	17	\$81.65	\$1,360.89
Total	300			50		\$4,082.67

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.

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.

If appropriate for public distribution (e.g., no sensitive information when aggregated, etc.), CISA 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.

⁵ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx>

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...

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.

Response...

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

The information collected by ICTAP will be retained in accordance with NARA General Records Schedule (GRS) 5.3, Item 020 (DAA-GRS-2016-0004-0002) – Employee emergency contact information.