

## Information Collection Request Support Statement: Part A

### National 911 Profile Database

OMB Control No. 2127 - 0679

#### Abstract:<sup>1</sup>

This is a request for extension of a currently-approved information collection. The information to be collected in the National 911 Profile Database includes data voluntarily submitted annually by State, territorial, and District of Columbia 911 agencies to the National 911 Program. The data collected is used to evaluate the status of 911 programs across the country, along with their progress in implementing upgraded and advanced systems and capabilities for emergency responses. The results of the collection and analysis are [posted in an annual report available to the public](#).<sup>2</sup> The information collection in this request for extension continues in the same survey format as used during the last three years. The survey's 56 data elements fall within two major categories: baseline and progress benchmarks.

- “Baseline” data elements (25 data elements) reflect the current status and nature of 911 operations from State to State. These elements are largely descriptive in nature, are intended to provide a general view of existing 911 services across the country, and are grouped within five categories:
  - Total 911 Calls and Call Type (six data elements)
  - Number of Public Safety Answering Points (PSAPs) and Equipment Positions (eight data elements)
  - Emergency Medical Dispatch and Operations (three data elements)
  - Call-Handling Quality Assurance (three data elements)
  - Minimum Training Requirements (five data elements)
- “Progress benchmarks” (31 data elements) reflect the status of State efforts to implement advanced next generation 911 systems and capabilities. As titled, these data elements are largely implementation or deployment benchmarks against which progress can be measured.
  - Planning (four data elements)
  - Procurement (eleven data elements)
  - Transition (three data elements)
  - Operations (four data elements)
  - Maturity Level (nine data elements)

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<sup>1</sup> The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) the purpose of the collection; and (8) if a revision, a description of the revision and the change in burden.

<sup>2</sup> [https://www.911.gov/project\\_national911progressreport.html](https://www.911.gov/project_national911progressreport.html)

There are no changes or adjustments to the burden since the last OMB approval and NHTSA continues to estimate the burden of this collection to be 5,488 hours.

Questions:

- 1. Explain the circumstances that make the collection of information, necessary. Identify any legal and 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 National 911 Program is housed within NHTSA's Office of Emergency Medical Services, which has a mission to provide coordination in assessing, planning, developing, and promoting comprehensive, evidence-based emergency medical services and 911 systems. Pursuant to 47 U.S.C. 942, Coordination of 911, E911, and Next Generation 911 implementation, the National 911 Program exists to coordinate 911 efforts, collect and create resources for State and local 911 agencies, and to oversee a grant program, specifically to upgrade the nation's outdated 911 infrastructure. NHTSA is requesting an extension of this information collection, carried out under 47 U.S.C. 942 (a)(3)(B), to continue to collect and aggregate information from State-level reporting entities that can be used to measure the progress of 911 authorities across the country in upgrading and enhancing their existing operations and migrating to more advanced – digital, Internet-Protocol-enabled – emergency networks. The data will be maintained in a “National 911 Profile Database.” One of the objectives of the National 911 Program is to develop, collect, and disseminate information concerning practices, procedures, and technology used in the provision of 911 services and to support 911 Public Safety Answering Points (PSAPs) and related State and local public safety agencies' 911 technological and operational upgrades. The National 911 Profile Database can be used to follow the progress of 911 authorities in upgrading their existing systems and implementing next-generation networks to more current functionality. This information collection supports NHTSA's mission to save lives, prevent injuries and reduce economic costs due to road traffic crashes by ensuring effective emergency responses to crashes of all nature (i.e., planes, trains, automobiles), and maximizing the chances of survival for crash victims.

- 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.**

The goal of the data collection process is to collect sufficient data and information to formulate a national 911 profile. The data in this national profile has been used and will continue to be used to accurately measure and depict the current status and capabilities of 911 systems across the United States, as well as progress made in implementing advanced technologies and operations – known as Next Generation (NG) 911. Assessments, based upon the data collected, will help draw attention to key roadblocks as well as solutions in NG911 implementation processes. Analysis of the data will also help target possible future activities and resources consistent with

the goals of the program. The information collected will be available in aggregated form to national, Federal, State and local stakeholders in the public safety community.

Under this effort, NHTSA requests reporting entities to voluntarily collect and annually report data indicating their progress in upgrading their existing 911 infrastructure to more advanced systems, utilizing a web-based data collection tool. Reporting entities are State, territorial, and District of Columbia 911 program officials; and the data reported will reflect State-level aggregated data. Where a State statute has not established a State-level 911 program, the authorized entity is the State E911 Coordinator designated under 47 U.S.C. 942(b)(3)(A)(ii).

This information collection involves a maximum of fifty-six (56) respondents, including the fifty States, the District of Columbia, and five U.S. Territories of Guam, American Samoa, Mariana Islands, U.S. Virgin Islands, and Puerto Rico.

The reporting entities are asked to submit data annually relating to their State or territory using a Web-based tool. The 911 authorities who manage the approximately six thousand 911 Public Safety Answering Points (PSAPs) nationwide, and related national, Federal, State and local public safety agencies will be the users of the data.

- 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.**

In order to collect information needed to develop and implement effective strategies that meet the Program's goal of providing leadership, coordination, guidance and direction to the enhancement of the Nation's 911 services, NHTSA utilizes a Web-based, data reporting and collection tool accessible through the website: [www.911.gov](http://www.911.gov).

- 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.**

The National 911 Program facilitates coordination and communication among Federal, State, and local emergency communications systems, emergency personnel, public safety organizations, telecommunications carriers, and telecommunications equipment manufacturers and vendors involved in the implementation of 911 services. There are other entities that have jurisdiction or interest in 911 information and data, but the National 911 Profile Database information collection serves a different purpose from these entities as discussed below.

While the Federal Communications Commission (FCC) does have jurisdiction over private sector entities such as telecommunications service providers and collects some data, the National 911 Program coordinates efforts among private and public entities at the Federal, State and local levels specifically involved with 911 services, and the access to emergency services. While the data collected by the FCC are useful, these limited excursions into issues related to 911 services

do not provide sufficient information to meet the needs of the public safety community for service evaluation and programmatic decision making.

The Emergency Communications Division of the Cybersecurity and Infrastructure Security Agency (CISA) within the Department of Homeland Security collects no data related to the demographic characterization of 911 agencies or their progress in implementing next generation technologies as part of the 911 infrastructure.

The National Association of State 911 Administrators (NASNA) does compile some information from its members that may contribute to the goal of this effort. However, NASNA membership does not include all States, and such collection is ad hoc and not currently part of any organized periodic effort.

The National Emergency Number Association (NENA) likewise periodically collects information and data that may contribute to this effort. However, like NASNA, those efforts are largely ad hoc in nature, and not comprehensive. This proposed collection will not duplicate those efforts.

While such data does exist at State and sub-State levels, no other source of aggregated data exists in any comprehensive way at a national level. Nor is such data readily accessible to the public safety agencies involved across the country.

Overall, the following criteria were applied to determine whether existing information may be duplicative:

- Currency of information – the data must be current in order to have utility for the program purposes described above.
- Nationwide – For the sake of national evaluation, the data involved must comprehensively reflect State and local activity across the country.
- Consistency – For the sake of aggregation and comparison, the data must be consistent with comparable elements.

Therefore, NHTSA assures that the collection of information for the 911 Profile database is not duplicative.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The collection of information has been limited to State reporting entities, and has no impact on small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The technology impacting 911 services continues to evolve substantially. Both public and private sectors have increasingly focused on addressing the need to upgrade and enhance the technology utilized by 911 services across the Nation. In addition, it is essential that emergency

responders are able to coordinate and collaborate with 911 agencies via comprehensive and seamless emergency communication systems as they update their own part of the emergency communications network. Without up-to-date information, the National 911 Program, along with State and local public safety entities would not be able to adequately gauge progress towards implementing more current and advanced 911 systems in any comparative fashion. While the National 911 Program will benefit from this information, it is anticipated that the greatest benefit will accrue to the State and local public safety community faced with the challenge of migrating to the next generation of 911 services and technology as they strive to respond to 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; or**
  - h. requiring respondents to submit proprietary trade secrets, 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.**

There are no special circumstances that require the collection of information to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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 the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views.**

Federal Register Notices: A copy of the Federal Register Notice is provided. The 60 Day Notice appeared in the Federal Register on April 19, 2021 (86 FR 20431). The closing date for comments was June 18, 2021. No comments were received. The 30 Day Notice appeared in the Federal Register on August 25, 2021 (86 FR 47537).

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gifts will be offered to State reporting entities involved in this process.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

No assurances of confidentiality are given by the agency. No personally identifiable information is collected. This program utilizes a secure web-based, data collection utility. As part of adopted program policies and procedures, data reported by each State will only be released subject to provisions of the Freedom of Information Act (FOIA), as amended. Annual summary reports will be available to the public.

**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.**

The data reporting and collection process involved in this request will not contain any questions related to matters that are commonly considered sensitive or private.

**12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.**

NHTSA estimates that submitting responses to the questions included in the proposed survey instrument utilizing the web-based tool requires an average of 98 hours per State entity to collect, aggregate and submit. Estimating the maximum number of respondents at 56 (the fifty States, the District of Columbia, and five U.S. Territories), this would result in a total burden of 5,488 hours (98 hours × 56 respondents).

The total labor costs associated with the burden hours are estimated by finding the average hourly wage and multiplying by the number of burden hours. Respondents will be State,

territory, and tribal government management personnel. To estimate reasonable staff expenses to respond to this information collection, the Agencies reviewed the Bureau of Labor Statistics (BLS) Occupational Outlook Handbook and determined that the Administrative Services Manager description closely aligns with the positions of recipient staff responsible for completing this request. BLS lists the average hourly wage as \$46.45.<sup>3</sup> Further, BLS estimates that State and local government wages represent 61.8% of total labor compensation costs.<sup>4</sup> Therefore, NHTSA estimates the hourly labor costs to be \$75.16 ( $46.45 \div 0.618$ ). The total labor cost based on the estimated burden hours is estimated at \$412,478. The table below provides a summary of the estimated burden hours and the labor costs associated with those burden hours.

Number of Respondents	Annual Hours per Respondent	Average Hourly Compensation	Estimated Annual Labor Cost per Respondent	Total Estimated Annual Burden Hours	Total Estimated Annual Labor Costs
56	98	\$75.16	\$7,365.68	5,488	\$412,478.08 or <b>\$412,478</b>

**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 already reflected in the response provided in question 12.**

There are no capital, start-up, or annual operation and maintenance costs involved in the collection of information. The respondents would not incur any reporting costs from the information collection beyond the time it takes to gather the information, prepare it for reporting and then populate the web-based data collection tool. The respondents also would not incur any recordkeeping burden or recordkeeping costs from the information collection.

**14. Provide estimates of annualized costs to the Federal government. 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 not have been incurred without this collection of information.**

Total estimated cost to the government for maintaining the data reporting and collection process is as follows: Contractor costs associated with collection, analysis, and report development total: \$174,460.37.

This estimate is based on the total cost for contractor supported collection, analysis and report of information obtained in the data collection process (no start-up costs), including a total of 1,129 fully loaded hours distributed among nine labor categories, ranging from \$116.68 to \$256.28 per hour.

<sup>3</sup> May 2019 National Occupational Employment and Wage Estimates by ownership, Federal, State, and local government, including government-owned schools and hospitals and the U.S. Postal Service, at <https://www.bls.gov/oes/current/999001.htm#11-0000> (BLS code 11-3010)

<sup>4</sup> Table 1 at <https://www.bls.gov/news.release/ecec.t01.htm>.

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.**

This is a request for extension of a currently-approved information collection. There are no changes or adjustments to the burden since the last OMB approval, and NHTSA continues to estimate the burden of this collection to be 5,488 hours

**16. For collection 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 as applicable.**

Based on the results of the data annually reported by State reporting entities, NHTSA plans to generate an annual summary report describing the progress of public entities across the country in implementing more advanced 911 systems and services. This report would be made available to public and private entities for use in their program development activities.

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

Approval is not sought to not display the expiration date.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.<sup>5</sup>**

No exceptions to the certification statement are made. The following statement appears on the Table of Contents page of the National 911 Profile Database: Data Dictionary (used as the data collection tool): "A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127 – 0679 (Expiration Date: 08/31/2021). This voluntary information collection gathers data that will be used to evaluate the status of 911 programs across the

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<sup>5</sup> [Specifically explain how the agency will display the OMB control number and expiration date and inform potential respondents of the information required under 5 CFR 1320.8(b)(3); the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.]



country, along with their progress in implementing upgraded and advanced systems and capabilities for emergency responses. We estimate that responding to this information collection will take approximately 98 hours. The results of the collection and analysis will be posted in an annual report available to the public. You may send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., NIO-300, Room W51-312, Washington, DC, 20590.”