

1 Supporting Statement for Paperwork Reduction Act Submission

Incident Communications Activity Report (ICAR)

OMB Control Number: 1670-NEW

Supporting Statement A

A. Justification

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

The Cybersecurity and Infrastructure Security Agency (CISA) Emergency Communications Division (ECD) is mandated by The Cyber Security and Infrastructure Security Act of 2018 (H.R. 3359) to “carry out the emergency communications responsibilities in accordance with title XVIII...and emergency stakeholder outreach and engagement...”

This information collection was requested by ECD stakeholders—including state and local emergency communications professionals—through The Incident Communications Activity Report (ICAR) form. The ICAR was developed with the intention of capturing and documenting the emergency communications activity of any organized incident management command and coordination structure established for an incident, planned event, or exercise.

The Emergency Communications Division (ECD) is a division within the Cybersecurity and Infrastructure Security Agency (CISA) which serves under the direction of the Department of Homeland Security (DHS). ECD coordinates with National Security and Emergency Preparedness (NS/EP) communications stakeholders to enable use of technical assistance and information sharing to reduce Communications system impacts or vulnerabilities.

CISA has authority to perform assessments and evaluations for federal and non-federal entities, with consent and upon request. CISA leverages several different authorities, including but not limited to Presidential Policy Directive – 21 (PPD-21), the National Infrastructure Protection Plan (NIPP) Voluntary Partnership Framework, and Sec. 871 of the Homeland Security Act of 2002. This authority is consistent with the Department’s responsibility to “[c]onduct comprehensive assessments of the vulnerabilities of the Nation’s critical infrastructure in coordination with the SSAs [Sector Specific Agencies] and in collaboration with SLTT [State, Local, Tribal, and Territorial] entities and critical infrastructure owners and operators.”

The Incident Communications Activity Report (ICAR) is intended to capture the emergency communications activity of any organized incident management command and coordination structure established for an Incident, Planned Event, or Exercise. As a result, CISA/ECD wishes

to execute a standard request from the Paper Reduction Act (PRA) to review, analyze, and revise current Incident Communication Activity.

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 information collected will provide on-the-ground data on emergency communications activity of any organized incident management command and coordination structure established for an incident, planned event, or exercise.

The information captured focuses on a number of key areas: incident complexity, command and coordination systems, and all-hazards information and communications technology positions, resources (e.g. voice and data systems, interoperability techniques, and planning references), challenges and general conditions encountered during the incident.

ICAR will be submitted electronically by the emergency responder with overall information and communications technology responsibilities within the identified command and coordination organization, for a reporting period.

This information will inform other jurisdictions on best practices while permitting data-driven decisions on future policy improvements. CISA, in support of the National Council of Statewide Interoperability Coordinators (NCSWIC) and SAFECOM, will collect data through a two-page report to capture the emergency communications activity of any organized incident management command and coordination structure established for an Incident, Planned Event, or Exercise. , CISA's goal is to identify lessons learned to drive strategy and improve existing or offer new technical assistance within the scope of emergency communications activity for Incidents, Planned Events, or Exercises. The ICAR is completed by the person with overall information and communications technology responsibilities with the identified command and coordination organization, for the indicated reporting period. The reporting period is flexible to meet agency or jurisdictional program needs. The report is designed to accommodate a single report for the incident or event duration, or multiple reports for smaller time periods within the same incident or event. State, local, territorial, or tribal communications and public safety technologies communications challenges and best practices will be captured. Public safety communications technologies would include – Cellular, Tactical Information Technology, Emergency Alert Systems, Land Mobile Radio, Satellite, 9-1-1 and emergency communications centers. Collecting and summarizing this data will drive our nationwide response, drive strategy, and goal development—subsequently improving existing and/or offer new Technical Assistance option to stakeholders.

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.

The ICAR is an electronically submitted form to populate the data sets which will be loaded, stored, and analyzed in the Division's data analytics system. Electronic data collection enables an efficient and straightforward submission process to submit, reducing the time and effort for the submitter while also reducing errors.

We will send the ICAR form out using a Microsoft Teams Form link via email. The ICAR form will require a total effort of approximately five minutes for completion. The ICAR form will be completed per incident. The recipients are individuals we deal with on a regular basis and are in constant contact with them. Leveraging the MS Forms and a fillable PDF there will be no printing of forms needed, no preparing and sending emails or memos per incident. Participants will be able to input free form information in addition to a couple drop down type questions which will be asked.

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.

Each ICAR respondent is considered an independent entity. The ICAR is designed for easy completion and all information is optional and/or voluntary. Only applicable and "Yes" responses are captured. Blank fields are assumed no, not applicable, or not being reported. The concept of duplication is not relevant to the ICAR as it remains unique to a singular Incident, Planned Event, or Exercise. CISA/ECD—in support of NCSWIC and SAFECOM—are unaware and unable to collect and/or locate relevant Incident Communications Activity data without implementing the ICAR instrument.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

This collection of information does not have an impact on small businesses and/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.

Opportunity to learn from a unique national pool of stakeholders. ECD wants to collect valuable lessons learned so ECD can better incorporate response coordination best practice efforts into future published work products. Without the collection and sharing of this information agencies/departments who did not appropriately handle response could potentially have significant issues during the next major event. This information will provide ECD stakeholders with valuable lessons learned allowing ECD to use the information for retooling response

coordination for future events. The information collected through the ICAR will inform future policy improvements to ensure relevancy to emergency communications professionals. Consequences include the lack of quantifiable information regarding current state of emergency communications management and coordination to respond and recover from catastrophic events.

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 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.**

- a. All data and information collected in the ICAR instrument is optional and/or voluntary. As a result, a structured reporting cadence—more often than quarterly and beyond—is not required.
- b. All data and information collected in the ICAR instrument is optional and/or voluntary. As a result, a structured reporting cadence—more often than quarterly and beyond—is not required.
- c. The circumstance above does not apply to the ICAR's data and information collection. The report is designed for simple completion. Only applicable and "Yes" responses are captured. Blank fields are assumed no, not applicable, or not being reportable.
- d. The circumstance above does not apply to the ICAR's data and information collection. The report is designed for simple completion. Only applicable and "Yes" responses are captured. Blank fields are assumed no, not applicable, or not being reportable.
- e. The special circumstances contained in item 7e of the Supporting Statement are not applicable to this information collection.
- f. The special circumstances contained in item 7f of the Supporting Statement are not applicable to this information collection.

- g. Existing information protection authorities will protect all data and information collected by the ICAR instrument.
- h. All data and information collected in the ICAR instrument is optional and/or voluntary. The ICAR instrument does not require respondents to submit proprietary trade secret, confidential, or classified information.

8. If applicable, provide a copy and identify the data 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 these comments. Specifically address comments received on cost and hour burden.

	Date of Publication	Volume #	Number #	Page #	Comments Addressed
<i>60-Day Federal Register Notice:</i>	10/20/2022	87	63792	63792-63793	1
<i>30-Day Federal Register Notice</i>	9/5/2023	88	60698	60698-60700	0

A 60-day notice for comments was published in the Federal Register on 10/20/2022. **1** comments were received related to the 60-day notice. Comment has been responded to in the FRN

A 30-day notice for comments was published in the Federal Register on 9/5/2023. **0** comments were received related to the 30-day notice.

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

There is not any payment or gift associated with the ICAR instruments data and information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Name, telephone number, and email are not required and/or mandatory fields within the ICAR. ECD only uses the names, telephone numbers, and emails on the ICAR when they are provided voluntarily to follow-up on data captured within the report. Further, ICAR respondents already interface with ECD on a regular basis and as a result, ECD already maintains their relevant contact information.

The information collected will be housed on secured servers and the information will not be shared with any outside sources besides the generalized congressional report which will not include personal information and adhered privacy.

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 person's form whom the information is requested, and any steps to be taken to obtain their consent.

The ICAR instrument does not contain any questions of a sensitive nature. Only applicable and "Yes" responses are captured in the ICAR instrument. Blank fields are assumed no, not applicable, or not being reported. All information is optional and/or voluntary.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14**

As it is voluntary, ECD does not know the number of potential respondents. ECD estimates the number of respondents based on the current members as part of NCSWIC and SAFECOM. ECD engages 56 state and territory Statewide Interoperability Coordinators (SWICs). ECD estimates that the report evaluation will take less than 5 minutes 0.08 hours to complete per organization. To estimate the total burden, the time required to complete the report is multiplied by the loaded hourly compensation rate for each respondent type. The compensation rates are based on Bureau

of Labor Statistics (BLS) National Occupational and Wage Estimates. We use the following hourly wages for the respondents of this collection. The hourly wage for a fire lieutenant is \$27.09¹, for a fire captain it is \$39.99², for a police lieutenant it is \$33.66³, for a police captain it is \$46.72⁴ for a municipal emergency manager it is \$40.53⁵, and for statewide radio manager it is \$51.40⁶. The BLS mean hourly wage is multiplied by a load factor of 1.45496 to account for non-salary compensation. This load factor is estimated by dividing total compensation by salaries and wages,⁷ and the loaded compensation factors are presented in Table 1, along with the calculations for the burden estimates. CISA estimates a total burden of 37.5 hours for this collection, at a cost of \$2,131.15.

Table 1: Instruments and Breakdown

Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (hours)	Total Time Burden (hours)	Fully Loaded Average Hourly Compensation Rate	Total Cost
Fire Lieutenant	100	1	0.083	8.33	\$39.41	\$328.46
Fire Captain	50	1	0.083	4.17	\$58.18	\$242.43
Police Lieutenant	100	1	0.083	8.33	\$48.97	\$408.12
Police Captain	50	1	0.083	4.17	\$67.98	\$283.23
Municipal Emergency Manager	50	1	0.083	4.17	\$58.97	\$245.71
Statewide Radio Manager	100	1	0.083	8.33	\$74.78	\$623.21

1 Wage for BLS Occupation Code 33-2011 firefighters, <https://www.bls.gov/oes/2020/may/oes332011.htm>

2 Wage for BLS Occupation Code 33-2021 First-line supervisors of firefighting and prevention workers, <https://www.bls.gov/oes/2020/may/oes332021.htm>

3 Wage for BLS Occupation Code 33-3051 police and sheriff's patrol officers, <https://www.bls.gov/oes/2020/may/oes333051.htm>

4 Wage for BLS Occupation Code 33-1012 first-line supervisors of police and detectives, <https://www.bls.gov/oes/2020/may/oes331012.htm>

5 Wage for BLS Occupation Code 11-9161 emergency management directors, <https://www.bls.gov/oes/2020/may/oes119161.htm>

6 Wage for BLS Occupation Code 11-9000 other management occupations, https://www.bls.gov/oes/2020/may/oes_nat.htm#11-0000

7 Civilian load factor based on BLS Employer Cost for Employee Compensation Summary, December 2020, released March 18, 2021. <https://www.bls.gov/news.release/pdf/ecec.pdf> Total compensation (\$38.60)/salaries and wages (\$26.5) = Load Factor (1.45496)

	450			37.5		\$2,131.15
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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: (a) 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 or keep records for the government or (4) as part of customary and usual business or private practices.**

There is no associated capital, collection, printing, or mailing costs for respondents.

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 not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

CISA/ECD estimate that it would cost approximately \$15,000 for a contractor to review the assessment data and create the report. Additionally, CISA assumes that five percent one of a GS-14 (FTE) in the Washington, D.C. area will be required to oversee this effort. The annual salary of a GS-14 Step 3 FTE in the Washington, D.C. area is \$130,698.⁸ CISA/ECD multiplies a load factor of 1.6164⁹ to the annual salary, resulting in an annual cost of \$211,258, 5% of which would be \$10,563. Combining the contractor cost estimate of \$15,000 and 5% of a GS14 Step 3 at \$10,563 results in a total government cost of \$25,563.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

This is a new data and information 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.

CISA will not publish specific itemized report results. The reports will be used to drive internal strategy and goal development

Outline on proposed timing:

- Send out Data Collection Form once approved.
 - o 0 to 140 days collect
 - o 141-154 days collect any additional forms, start analyzing data.
 - o 155-160 days finish analyzing data, present data findings to ECD Leadership.
 - o 161-179 days prepare a subset summary of data based on meeting with ECD leadership and share with NCSWIC and SAFECOM Executive Committees.
- The plan is to keep this ICAR data collection tool open for an extended period allowed.

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.

CISA will display the expiration date for OMB approval of this data and information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

⁸ Office of Personnel Management. Salary Table 2021-DCB. Annual salary for GS-14, Step 3.

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB.pdf>

⁹ State and Local Government load factor based on BLS Employer Cost for Employee Compensation Summary, December 2020, released March 18, 2021. <https://www.bls.gov/news.release/pdf/ecec.pdf>. Total compensation (\$53.47) / Salaries and Wages (\$33.08) = 1.616385

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