

Supporting Statement for Paperwork Reduction Act Submissions

Title: Emergency Response Operations Branch

OMB Control Number: 1670-0027

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: As part of the Government Accountability Office (GAO) Audit 22-104462, CISA Central is currently developing an evaluation feedback form which will capture feedback from owners and operators to determine the usefulness and relevance of the integration and coordination efforts between ESF #2, CISA Central/ERO, and the private sector.

[Critical Infrastructure Protection: CISA Should Assess the Effectiveness of its Actions to Support the Communications Sector | U.S. GAO](#)

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 Emergency Response Operations (ERO) Branch Feedback Form consists of five customer surveys: Emergency Response Operations Communications Analysis Survey; Emergency Support Function (ESF) #2; Emergency Support Function #14; ERO National Coordinating Center for Communications (NCC) - Information Sharing and Analysis Center (ISAC); and National Security Emergency Preparedness (NSEP) Continuity Survey Feedback Form. The purpose of the surveys is to capture stakeholder feedback on shared products to ensure value to recipients and to guide and improve future products and processes. Making a feedback survey available to stakeholders was recently identified as a requirement in a GAO Audit. A link will be provided to the various distribution lists through Microsoft Forms.

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: We will be using Microsoft Forms to collect information that will allow us to leverage the Office365 platform to capture survey data. The data is encrypted and hosted on the cloud

and can be connected to the Power Automate platform for additional capabilities. The forms being digitized also means that forms can be created and disseminated with ease.

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

Response: A search of reginfo.gov revealed that this information is not collected in any form, and therefore is not duplicated elsewhere.

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: Emergency Response Operations has a requirement for making a feedback survey available to stakeholders. Failure to do so will result in non-compliance with the GAO Audit.

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.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

(c) Requiring respondents to submit more than an original and two copies of any document.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (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.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (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.

Response: The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

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

8. Federal Register Notice:

- a. Provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
- b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.
- c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be

circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

| | Date of Publication | Volume # | Number # | Page # | Comments Addressed |
|--------------------------------|---------------------|----------|----------|--------|--------------------|
| 60Day Federal Register Notice: | | | | | |
| 30-Day Federal Register Notice | | | | | |

Response: *a. 30/60 – Day Federal Register Notices-will update after 30/60-day notices publish*
 b/c/d: Not applicable

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: This collection is privacy sensitive due to its collection of personally identifiable information in the form of the respondent’s email and is covered by DHS/ALL/PIA – 006 DHS General Contacts List. The PII collected is also covered under DHS/ALL – 002 Department of Homeland Security (DHS) Mailing and Other Lists System November 25, 2008, 73 FR 71659.

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.

Response: CISA Central provides multiple reports that are distributed to DHS and CISA Senior Leaders, internal partners, and external stakeholders and are requiring to solicit feedback to improve reporting products

will be conducting s 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.

The Emergency Response Operations (ERO) Branch anticipates distributing 400 surveys annually. As this survey is voluntary, ERO assumes that 10 percent of those contacted will complete the survey, for a total of 40 annual respondents. CISA estimates that it will take a respondent 10 minutes (0.1667 hours) to complete this form. To estimate the cost of this collection, CISA multiplies the estimated annual hour burden by the loaded wage rate for all occupations within the United States, based on Bureau of Labor Statistics (BLS) data. According to BLS, the mean hourly wage for all occupations is \$27.07.¹ To account for benefits and other compensation, this wage was multiplied by 1.4127, to produce a loaded hourly wage of \$38.24.² Multiplying the total annual hour burden (6.67) by this loaded hourly wage (\$38.24) provides an estimated annual cost of \$255.

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 |
|-------------------------------|-----------------------|--------------------------|--|--------------------------------|--------------------------|------------|
| ERO Stakeholder Feedback Form | 40 | 1 | 0.17 | 6.67 | \$38.24 | \$255 |

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.)

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

¹ https://www.bls.gov/oes/2020/may/oes_nat.htm#00-0000

² Table 1. Employer Costs for Employee Compensation by Ownership. Private Industry Workers. https://www.bls.gov/news.release/archives/ecec_12162021.pdf. The load factor is estimated by dividing total compensation (\$37.24) by salaries and wages (\$26.36).

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.

Once the surveys have been completed, CISA ERO personnel will review the responses. We estimate that each review will take 10 minutes (0.1667 hours) to complete and will be done by government personnel at the GS-14, Step 4 level. According to the Office of Personnel Management (OPM), the hourly salary for a GS-14 Step 4 in the DC locality pay area is \$66.53³, which we multiply by a load factor of 1.61⁴, for a fully loaded hourly rate of \$107.32. We then multiply the hourly rate by the total number of hours (6.67) to get a total cost to the federal government of \$715.

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

| Instrument | Number of Respondents | Responses per Respondent | Average Burden per Response (in hours) | Total Annual Burden (in hours) | Average Hourly Wage Rate | Total Cost |
|-------------------------------|-----------------------|--------------------------|--|--------------------------------|--------------------------|------------|
| ERO Stakeholder Feedback Form | 40 | 1 | 0.17 | 6.67 | \$107.32 | \$715 |

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 of information.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Response: DHS-CISA Central does not intend to employ the use of statistics or the publication thereof for this information collection.

³ [Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/salaries-and-wages/)

⁴ Load factor based on compensation and salary data for state and local government workers, per the BLS employer cost for employee compensation, September 2021. https://www.bls.gov/news.release/archives/ecec_12162021.pdf

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