

Supporting Statement for Paperwork Reduction Act Submissions

Title: SAFECOM Nationwide Surveys Generic Clearance

OMB Control Number: 1670-0048

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.

In 2006, Congress amended the Homeland Security Act and passed the Post-Katrina Emergency Management Reform Act of 2006 (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. *See* 6 U.S.C. § 571.

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

Further, 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, to 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(a) requires the DHS Secretary, through the Executive Assistant Director for the Emergency Communications Division, to conduct an assessment of Federal, State, local, and tribal governments at least every five years that (1) defines the range of capabilities needed

by emergency response providers and relevant government officials, (3) assesses the current available capabilities to meet such communications needs; (4) identifies the gap between such current capabilities and defined requirements.

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.

To meet the statutory requirements of 6 U.S.C. §573, ECD conducts the SAFECOM Nationwide Survey (SNS) not less than every 5 years to assess nationwide emergency communications operability, interoperability, continuity, and security capabilities at all levels of government. Responses for the most recent iteration of the SNS were collected from May to October of 2023.

SAFECOM Nationwide Survey:

CISA ECD conducts a survey entitled the SAFECOM Nationwide Survey, hereinafter referred to as the SNS. The purpose of the SNS is to gather information from organizations with an operational role in emergency communications 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 uses this information 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 is comprised of a battery of instruments designed and distributed to emergency response disciplines at the federal, state/territorial, tribal, and local (county and municipal) levels of government, as well as the private sector. Methods of administration (questionnaire or interview) and distribution (online web form distributed via email or print forms distributed by mail) are used as appropriate to meet the needs and preferences of various segments of the target population. The SNS solicits responses regarding issues affecting emergency communications to determine a jurisdiction's level of communications operability, interoperability, continuity, and security. CISA ECD analyzes the data collected from this general survey to identify major gaps and themes affecting emergency communications across levels of government. This analysis informs the development of supplemental surveys and information collections tailored to specific needs across the emergency response community, as well as future iterations of the Nationwide Baseline Communications Assessment (NCBA), Biennial Progress Report (BPR), National Emergency Communications Plan (NECP), and other products and initiatives that enable ECD to carry out its statutory responsibilities at 6 U.S.C. §571(c).

SAFECOM Supplemental Surveys:

CISA ECD also conducts SAFECOM supplemental surveys. Supplemental instruments consist of web- and paper-based surveys, as well as other information collection methods such as focus groups and interviews. CISA ECD uses information collected in the supplemental surveys to complete statutorily mandated requirements (6 U.S.C. §571(c), 572(a), and 573) and will share the data with participating stakeholders as appropriate. The SAFECOM supplemental surveys deploy topic-specific or targeted surveys to various emergency response disciplines at the

federal, state, territorial, tribal, and local levels of government, as appropriate, as well as the private sector. The instruments solicit responses regarding targeted issues affecting specific segments of the emergency response community. CISA ECD analyzes the data collected from these supplemental surveys to identify changing requirements, mitigate risks, and help further inform the data collected from the SNS.

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.

For both the SNS and the supplemental surveys, ECD uses multiple data collection techniques to encourage respondents to select a response method that best supports their needs. Many members of the target audience—emergency response providers—work long hours, are frequently interrupted by emergency events, and have variable schedules. To support this operational environment, CISA ECD provides electronic web-based questionnaires using commercial software, such as Qualtrics. When information is collected via online platforms, respondent internet protocol (IP) addresses are collected automatically as response metadata. CISA ECD uses this information to ensure that all responses are unique (one response per responding agency, not individual persons) and valid (all responses are submitted by valid organizations located within the geographic United States and its territories). ECD also distributes printed survey questionnaires to invited participants and conducts direct interviews with some members of the target population (e.g., state officials, federal representatives, tribal leaders) as appropriate.

CISA ECD utilizes a variety of submission methods for both the SNS and the supplemental surveys. For questionnaires, alternate forms include a PDF-fillable form which can be returned via email and a paper copy mailed directly to the respondent(s) requesting a hard copy. The paper copy can be returned either via a prepaid envelope, scanned and emailed, and/or faxed to CISA ECD. For interviews, responses may be collected in-person or virtually, and individually or collectively during conference, working group, or focus group sessions.

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.

A search of reginfo.gov revealed two other interoperability surveys not related to previous iterations of the SNS. The first was conducted by DHS Science and Technology (S&T) and expired in 2007. The second was conducted by the Department of Justice (DOJ) and expired in 2010. Neither of these collections can enable a current assessment of emergency communications capability needs and gaps to satisfy periodic assessment requirements at 6 U.S.C. §573.

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.

This collection will impact small entities, including some local and tribal public safety organizations. Use of multimodal submission methods and conservative question design to collect only relevant and available information will minimize this burden.

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.

Without a survey, ECD cannot obtain the range of information needed to carry out statutory responsibilities. The collection of data from the SNS and the supplemental surveys enables other elements of ECD's statutory mission, including development of the NECP, Nationwide Communications Baseline Assessment report (NCBA), Biennial Progress Report (BPR) stakeholder engagement with FSLTT and private industry partners to promote and attain emergency communications interoperability and continuity nationwide, and other ECD responsibilities enumerated at 6 U.S.C. § 571(c).

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.
 - a. The special circumstances contained in item 7 a. of the Supporting Statement are not applicable to this information collection.
 - b. The special circumstances contained in item 7 b. of the Supporting Statement are not applicable to this information collection.
 - 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. Providing and fulfilling data privacy pledges are a key element in building respondent trust in data collections and ensuring adequate response rates to meet assessment needs. CISA ECD has partnered with CISA OCIO to understand and formalize information security requirements for survey response datasets that define deidentification, anonymization, and aggregation requirements as these pertain to information sharing. Confidentiality pledges provided to SNS respondents will clearly specify what type of information may be shared with partners (e.g., deidentified row-level response data or aggregate response information only). No row-level response data sharing requirements exist in legislative requirements that would prevent ECD from fulfilling this pledge.
- 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.

	Date of Publication	Volume #	Number #	Page #	Comments Addressed
<i>60-Day Federal Register Notice:</i>	8/25/2025	90	162	41400-41402	0
<i>30-Day Federal Register Notice:</i>	11/28/2025	90	227	54732-54733	0

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 to develop the SNS and any supplemental surveys. ECD will utilize regular SAFECOM and NCSWIC meetings, which it hosts, and other available opportunities for this purpose.

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

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.

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).

No questions will be asked that may jeopardize the privacy of any respondent. Respondents will be instructed not to provide PII in response to any question on the instrument, and any PII received will be removed from the results as part of data cleaning, preventing it from ever being included in analysis and archival datasets. 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.

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.

ECD is required by statute (6 U.S.C. § 573(a)) to conduct an assessment on federal, state, local, and tribal governments that defines the emergency communications needs for emergency response providers and relevant government officials. ECD estimates this population to include approximately 103,311 organizations with an operational role in emergency communications, including

- o Federal: 14 Emergency Communications Preparedness Center member departments and agencies¹;
- o State: 56 states and territories, including the District of Columbia;
- o Tribal: 574 federally recognized tribal nations²; and
- o Local Emergency Services Sector (ESS): 102,667 municipal and county emergency services sector organizations, including law enforcement (17,709), fire and rescue (29,888), emergency medical service (21,280), emergency communications center/public safety answering point (ECC/PSAP)(4,600)³, emergency management (9,790), and public works (19,400)⁴;
- o Based on response trends from previous iterations of the SNS, CISA ECD anticipates 100% participation among federal and state respondents and roughly 10% participation among tribal and local respondents. The population for supplemental surveys is not known at this time. Supplemental surveys will be conducted on an as-needed basis to obtain additional information on a specific gap identified in the SNS. Supplemental Surveys will also be utilized to collect information regarding emergency communications capabilities from private sector emergency response providers in critical infrastructure roles which are not yet identified. CISA ECD anticipates narrowly targeted subpopulations for these supplemental surveys with fewer than 10,000 responses across all supplemental surveys.

Anticipated Number of Respondents Per Collection:

Level of Government	Size of Population Times Expected Response Rate
Federal	14 x 100% = 14
State/Territorial	56 x 100% = 56
Tribal	574 x 10% = 57
Local ESS (municipal and county)	102,667 x 10% = 10,267
Supplemental Surveys	10,000
Total	20,394

CISA ECD is required to perform its nationwide assessment not less than every 5 years. To provide adequate information on nationwide communications capabilities and gaps to support emergency communications stakeholders and enable CISA ECD to execute its other responsibilities at 6 U.S.C. §§ 571(c), 572, and 576(c), CISA ECD undertakes assessments of some portions of the target population more frequently than once per 5 years.

¹ Source: <https://www.cisa.gov/resources-tools/programs/emergency-communications-preparedness-center-ecpc>

² Source: U.S. Department of Interior. Bureau of Indian Affairs

³ This value includes regionally consolidated ECC/PSAP and dispatch centers.

⁴ Source: Other than ECC/PSAP https://www.cisa.gov/sites/default/files/publications/NPPD_emergency-services-sector-profile-v3.pdf. ECC/PSAP <https://www.safetysource.com/index.cfm>

Annualized Number of Respondents:

Level of Government	Anticipated Number of Respondents Per Collection Times Number of Collections Per Year
Federal	14 x 1 = 14
State/Territorial	56 x 1 = 56
Tribal	57 x (1/5) = 11
Local ESS (municipal and county)	10,267 x (1/2) = 5,134
Supplemental Surveys	10,000 x (1/5) = 2000
Total	7,215

CISA ECD estimates that questionnaire forms, which will be the primary method of data collection for tribal and local ESS respondents and supplemental surveys, will take approximately 30 minutes to complete. Interviews, which will be the primary method of data collection for federal and state respondents, are expected to take approximately 60 minutes to complete.

Annualized Burden Hours:

Level of Government	Annualized Number of Respondents Times Hourly Burden
Federal	14 x 1 = 14
State/Territorial	56 x 1 = 56
Tribal	11 x 0.5 = 6
Local ESS (municipal and county)	5,134 x 0.5 = 2,567
Supplemental Surveys	2,000 x 0.5 = 1000
Total	3,643

To compute the cost of this hourly burden, CISA ECD multiplies burden by the fully loaded hourly wage rate for each respondent discipline. To compute the fully loaded hourly wage rate for each discipline, the mean hourly wage rate is multiplied by a benefit multiplier: **(Mean Hourly Wage Rate) x (Benefit Multiplier)**. CISA’s Emergency Services Sector Profile⁵ provides the following sector decomposition by discipline.

Discipline	Percentage of Population	Annualized Responses
Fire and Rescue	29,888 / 102,667 = 29.1%	7,215 x 29.1% = 2,100
Law Enforcement	17,709 / 102,667 = 17.2%	7,215 x 17.2% = 1,245
Emergency Medical Services	21,280 / 102,667 = 20.7%	7,215 x 20.7% = 1,495
Public Works	19,400 / 102,667 = 18.9%	7,215 x 18.9% = 1,363
ECC/PSAP	4,600 / 102,667 = 4.5%	7,215 x 4.5% = 323
Emergency Management	9,790 / 102,667 = 9.5%	7,215 x 9.5% = 688

For the purposes of these calculations, DHS is using data from the Bureau of Labor Statistics (BLS) May 2024 Occupational and Wage Statistics Tables’ Mean Hourly Wage rate for each

⁵ Source: https://www.cisa.gov/sites/default/files/publications/NPPD_emergency-services-sector-profile-v3.pdf

discipline.⁶ The Benefit Multiplier was designated as 1.6235 for each discipline, calculated using the June 2025 BLS Economic News Release for Employer Costs for Employee Compensation.⁷ The load factor is estimated by dividing Total Compensation (\$64.00) by Salaries and Wages (\$32.42) = 1.6235.

Table A.1: Estimated Annualized Burden Hours and Costs

Type of Respondent	Annualized Number of Respondents	Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Cost
Fire and Rescue (33-2011)	2,100	1	0.5	1,050	\$30.72 x 1.6235 = \$49.88	\$52,378.96
Law Enforcement (33-3000)	1,245	1	0.5	622	\$36.32 x 1.6235 = \$58.97	\$36,692.62
Emergency Medical Services (29-2040)	1,495	1	0.5	748	\$24.26 x 1.6235 = \$39.39	\$29,451.08
Public Works (49-9071) ⁸	1,363	1	0.5	682	\$25.21 x 1.6235 = \$40.93	\$27,900.59
ECC/PSAP (43-5031)	323	1	0.5	162	\$26.35 x 1.6235 = \$42.78	\$6,914.76
Emergency Management (11-9161)	688	1	0.5	344	\$46.97 x 1.6235 = \$76.26	\$26,232.64
Totals	7,215			3,608		\$179,570.66

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

⁶ Source: Bureau of Labor Statistics. *Occupational Employment and Wage Statistics (OWES) Tables*. <https://www.bls.gov/oes/tables.htm>

⁷ Source: Bureau of Labor Statistics. *Table 3: State and local government workers by occupational and industry group*. https://www.bls.gov/news.release/archives/ecec_06132025.htm

⁸ Wage rate information for “Maintenance and Repair Workers, General” were used to represent this subsector.

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.

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.

CISA ECD utilizes 0.75 full-time equivalent (FTE) federal employees to maintain and analyze SNS response data, ranging from GS12-04 to GS13-10, depending on personnel availability. Using the Washington, DC locality rate in the [2025 General Schedule \(GS\) Salary Table](#), the hourly wage rate of a GS12-04 employee is \$53.45 and the hourly wage rate of a GS13-10 employee is \$75.11. The hourly wages are multiplied by the government load factor of 1.6792. The load factor of 1.6792 is estimated by dividing average total compensation for all levels of education in Table 2-3 (\$75.90) by average wages for all levels of education in Table 2-1 (\$45.20), from the Congressional Budget Office publication [Comparing the Compensation of Federal and Private-Sector Employees in 2022](#). This results in a loaded hourly wage of \$89.75 for the GS12-04 employee and \$126.12 for the GS13-10 employee. The total federal cost of this collection is estimated by multiplying the loaded hourly wage by the 1,560 hours necessary (0.75 FTE or 75% of annual time) to review the submitted forms. For the GS12-04 employee: $\$89.75 \times 1,560 \text{ hours} = \$140,015.35$. For the GS13-10 employee: $\$126.12 \times 1,560 \text{ hours} = \$196,754.97$. Therefore, the estimated cost range is \$140,015.35 to \$196,754.97.

CISA ECD will utilize existing enterprise licenses for Qualtrics to support web-based survey tool design and data collection. These enterprise licenses “float” within the agency and are assigned

as needed to work units performing survey collections and analysis. They do not present a separate direct cost to the Federal Government.

CISA ECD will utilize Governing Printing Office (GPO) and United States Postal Service (USPS) to create and deliver physical invitations to participate in the SNS to local and tribal organizations. CISA ECD anticipates approximately \$28,500 in direct print (\$0.02 per invitation) and postage (\$0.55 per invitation) costs for 50,000 annualized invitations sent.

Total Estimated Annual Cost to the Government = \$168,515.35.

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.

This updated form reflects program changes in the scope, frequency, distribution, and target population of the SNS. The new estimated costs of performing the SNS are substantially similar to previous estimates despite these program changes. Changes and their impacts on the hour and cost burden are described below.

- Expand target population to include Public Works: increased hourly burden by adding new respondents. This change is made to provide complete coverage of the Emergency Services Sector, the sector responsible for most primary delivery of emergency response services.
- Increase frequency of local (municipal and county) survey from once each 5 years to once each 2 years: increased hourly burden by collecting responses more frequently. This change is made to enhance the granularity of nationwide emergency communications capability trends, especially for rapidly evolving topics like cybersecurity and technology.
- Increase physical print mailings: increased direct Federal Government costs by sending more physical mail invitations to participant organizations. This change is made to improve response rates to the SNS caused by email delivery failures.
- Decreased anticipated response rates in burden calculation. This change is made to more accurately reflect true response rates and therefore true respondent burden, based on response trends observed in the most recent iteration of the SNS, executed May to October 2023. This change results in a significant net decrease on the estimated annualized burden.
- Decreased target population at State and Federal level of government and increase collection frequency from once each 5 years to annually. This change is made to reflect an updated distribution plan for State and Federal participants utilizing in-person or virtual interviews with Emergency Communications Preparedness Center (ECPC) member department & agency representatives and Statewide Interoperability Coordinators (SWICs). This method of collecting SNS responses enhances the quality and comprehensiveness of response data and provides more useful programmatic information for federal and state respondents. This change results in a net decrease in respondent burden by significantly reducing the number of responses completed at the state level.

- Decreased number of CISA ECD federal employees estimated to support SNS distribution, data management, and data analysis. This change is made to reflect transformation of the ECD workforce and to more accurately reflect the way in which survey administration is performed (namely, that distribution, collection, record keeping, and analysis effort is not performed on a per-response basis but rather represents an ongoing work assignment). This change results in a decrease in estimated direct costs to the Federal Government, driven mostly by a decrease in the GS level of assigned federal employees.
- **Net impacts of program changes:**
 - **Decreased Estimated Annualized Burden Hours and Costs by \$28,328.59 (from \$207,899.25 to \$179,570.66)**
 - **Decreased Estimated Costs to Federal Government by up to \$108,036.41 (from \$276,551.76 to \$168,515.35, with variation based on GS level of assigned federal employee)**

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 ECD will publish its reports resulting from collection through its website and, if required, through direct distribution to Congress through the DHS Office of Legislative Affairs. CISA ECD does not intend to utilize complex or unusual techniques to analyze SNS data. Qualitative information will be characterized using standard techniques for calculating population proportions and standard errors. Quantitative findings will be derived from qualitative findings using standard techniques for operationalizing qualitative data.

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

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.

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