

# 1 Supporting Statement for Paperwork Reduction Act Submission

OMB Control Number: 1670-NEW

## Statewide Communication Interoperability Plan

### General Instructions

**A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.**

### Specific Instructions

#### 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 Office of Emergency Communications (OEC), formed under Title XVIII of the Homeland Security Act of 2002, 6 U.S.C. § 101 et seq., is responsible for ensuring that activities funded by the Interoperable Emergency Communications Grant Program (IECGP) (6 U.S.C. 579) comply with the Statewide Communication Interoperability Plan (SCIP) for that State required by section 7303(f) of the Intelligence Reform and Terrorism Prevention Act of 2004 (6 U.S.C. 194(f)). Further, under the Implementing Recommendations of the 9/11 Commission Act of 2007 (6 U.S.C. 579(m)), a State that receives a grant under the IECGP must annually submit to the Director of OEC a report on the progress of the State in implementing its SCIP and on achieving interoperability at the city, county, regional, State, and interstate levels. OEC is then required to make these reports publicly available (6 U.S.C. 579(m)). The SCIP Implementation Report Form is designed to meet these statutory requirements.

- 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.**

States applying for IECGP funding will use the SCIP Implementation Report to meet the statutory reporting requirement under the Implementing Recommendations of the 9/11

Commission Act of 2007 (6 U.S.C 579(m)). OEC will use the information received from the States in the SCIP Implementation Report to meet its statutory requirement of making the State reports publically available under Implementing Recommendations of the 9/11 Commission Act of 2007 (6 U.S.C 579(m)). In addition, OEC will use the information gained through the reports to track progress that States are making in implementing milestones and demonstrating goals of the National Emergency Communications Plan, as required through the Homeland Security Act of 2002, 6 U.S.C. § 101 et seq. All information gathered will be maintained in OEC electronic files. The type of information collected provides the current status of States' interoperable communications. The information will be collected electronically via e-mail. The form used is called the Statewide Communication Interoperability Plan Implementation Report. It is one report that has several pages to be completed. There is no additional burden placed on respondents and there is no request for additional information. Once submitted, respondents will receive an email confirmation of receipt. Because OEC has deemed the information in the SCIP Implementation Reports as sensitive national security information, individual submissions by each State and territory will not be released. However, OEC plans to complete and publish a report by the end of Calendar Year 2010 (pending ICR clearance) which will present aggregated nationwide findings summarizing achieved capabilities and remaining gaps at the national level.

A Statewide Interoperability Coordinator (SWIC) from each State and territory will complete the SCIP Implementation Report each year. The universe of respondents will not change from year to year.

OEC does not anticipate any significant changes or revisions to the SCIP Implementation Report from year to year. If significant revisions to the report are needed, OEC will submit a revised ICR package following the normal review/clearance process for OMB. Otherwise, OEC will submit to OMB a change request for non-substantial changes.

- 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 collection of information is solely electronic via e-mail. OEC e-mails the report template to respondents and the respondents will email it back. OEC will provide an email receipt confirmation to the respondent.

- 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.**

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 burden.**

This information collection does not have an 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.**

If OEC does not collect this information it will not be able to carry out key statutory responsibilities of the office—ensuring that States receiving grant funding under the IECGP use such funds in accordance with their Statewide Communication Interoperability Plans; identifying how States receiving grant funding under the IECGP are implementing their SCIPs and improving interoperability across all levels of government; and identifying States’ progress in implementing goals and milestones of the National Emergency Communications Plan.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**\*requiring respondents to report information to the agency more often than quarterly;**

**\*requiring respondents to prepare a written response to a collection of information**

**in fewer than 30 days after receipt of it;**

**\*requiring respondents to submit more than an original and two copies of any document;**

**\*requiring respondents to retain records, other than health, medical, government**

**contract, grant-in-aid, or tax records, for more than three years;**

**\*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;**

**\*requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

**\*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**

**\*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.**

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

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 in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The SCIP Implementation Report is a newly proposed form. The comment period for the proposal will last 60 days, and OEC will consider all public comments that it receives on the proposed rule, including comments on the information collection aspects of the proposed rule, during the comment period.

Apart from the proposed changes, the request and evaluation forms were originally developed internally and the collection was reviewed in detail and approved through the internal structure of OEC and NPPD.

60 Day Federal Register Notice: Tuesday, January 5, 2010 (Volume 75, No. 2), Page 417. There were no comments received.

30 Day Federal Register Notice: Thursday, April 22, 2010 (Volume 75, No. 77), Page 21011. There were no comments received.

**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.**

No assurance of confidentiality is provided to respondents. However, per the Implementing Recommendations of the 9/11 Commission Act of 2007 (6 U.S.C 579(m)), the OEC Director may make redactions that are determined to be necessary to protect classified or other sensitive

information. OEC does not anticipate that classified or other sensitive information will be provided through this information collection. Further, information protected by the Privacy Act of 1974 will be kept private or anonymous to the extent allowable by law.

- 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 sensitive nature.

- 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.**

OEC estimates that designated statewide interoperability coordinators and SCIP points of contact (police, fire, EMS, emergency managers, dispatchers, radio operators, government workers, etc.) will complete the reports if receiving funding under the IECGP. Test participants indicate that the total time required completing the SCIP Implementation Report amounts to 6 hours, including clerical time. Therefore, the total annual burden associated with the proposed elements of this collection is 6 hours. For an estimated 56 respondents per year, the burden is 336 hours. At a rate of \$24.42 per hour<sup>1</sup>, the dollar value of the total annual burden hours associated with

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<sup>1</sup> This hourly rate is an average hourly wage calculation based on Bureau of Labor Statistics (BLS) from May 2008 for numerous occupations of persons who attend OEC events, including the following: Medical and Health Services Managers; Emergency Management Specialists; Network and Computer Systems Administrators; Network Systems and Data Communications Analysts; Electrical and Electronic Engineering Technicians; Emergency Medical Technicians and Paramedics; First-Line Supervisors/Managers of Police and Detectives; First-Line Supervisors/Managers of Police and Detectives; First-Line Supervisors/Managers of Fire Fighting and Prevention Workers; First-Line Supervisors/Managers; Protective Service Workers (All Other); Fire Fighters; Police and Sheriff's Patrol Officers; Sales Representatives (Wholesale and Manufacturing, Technical and Scientific Products); Communications Equipment Operators (All Other); Reservation and Transportation Ticket Agents and Travel Clerks; Police, Fire, and Ambulance Dispatchers; Dispatchers (Except Police, Fire, and Ambulance); Legal Secretaries; Medical Secretaries; Secretaries (except Legal, Medical, and Executive); First-Line Supervisors/Managers (of Mechanics,

the existing elements of this information collection equals \$8,205.12. However, it should be noted IECGP grant recipients are able to use their management and administration portion of their Federal grant award to complete the report.

Table A.12: Estimated Annualized Burden Hours and Costs

Instrument Name	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
SCIP Implementation Report	56	1	6	336	\$24.42	\$8205.12

**13. Provide an estimate of the total annual [non-hour] 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 [including filing fees paid]. 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 submission or filing fee associated with this collection. As all pages are completed

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Installers, and Repairers); Radio Mechanics; Telecommunications Equipment Installers and Repairers (except Line Installers); US Government Employee (GS-13, Step 5, averaged across locality and CONUS).

via email there are no associated printing or mailing costs.

- 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.**

Based on internal review, OEC personnel estimate that it takes approximately 2 hours to review SCIP Implementation Reports. An average base salary of \$104.07/hour for contract support staff and Program Analysts Grade 13 step 5 was used for these calculations.

56 request/evaluation forms package x 2 hours/per report= 112 hours

112 hours x \$104.07 = \$ 11,655.84

**Total Cost to the Government = \$11,655.84**

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

This is a new collection; therefore there is no increase or decrease in the estimated annual burden.

- 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.**

The published FY 2010 Interoperable Emergency Communications Grant Program has established a reporting deadline of September 30, 2010 for States and territories to submit the reports. OEC will not publish the individual submissions of each State and territory. Because OEC has deemed the information in the SCIP Implementation Reports as sensitive national security information, individual submissions by each State and territory will not be released. However, OEC plans to complete and publish a report by the end of Calendar Year 2010 (pending ICR clearance) which will present aggregated nationwide findings summarizing achieved capabilities and remaining gaps at the national level.

- 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.**

OEC 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.**

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

## **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**
- 2. Describe the procedures for the collection of information including:
  - . Statistical methodology for stratification and sample selection,
  - . Estimation procedure,
  - . Degree of accuracy needed for the purpose described in the justification,
  - . Unusual problems requiring specialized sampling procedures, and
  - . Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**
- 3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**
- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

**5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons(s) who will actually collect and/or analyze the information for the agency.**

This collection does not employ statistical methods. Therefore, questions 1 through 5 do not apply.