

INFORMATION COLLECTION SUPPORTING STATEMENT

Pipeline Security Awareness (CD-1) Effectiveness Assessment OMB-1652-NEW January 11, 2008

- 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. (Annotate the CFR parts/sections affected).***

As prescribed by the President in Homeland Security Presidential Directive 7 (HSPD-7), the Department of Homeland Security (DHS) was tasked to protect our nation's critical infrastructure and key resources (CI/KR). Through the National Infrastructure Protection Plan (NIPP), DHS gives guidance and direction as to how the Nation will secure its infrastructure. Furthermore, HSPD-7 and the NIPP assigned the responsibility for infrastructure security in the transportation sector to TSA. To this effect, the NIPP further tasks each sector to build security partnerships, set security goals and to measure their effectiveness. Through its Corporate Security Review (CSR) program, TSA has conducted reviews of numerous pipeline systems in which various aspects of each company's security program are analyzed. Through this review process, TSA has determined that improved security awareness training for pipeline company employees would be useful. The OMB control number assigned to the CSR program is 1652-0036. To increase the security awareness levels across the pipeline industry, TSA plans to develop and distribute a Security Awareness Training compact disk (CD-1) to interested pipeline companies.

In order to measure the effectiveness of CD-1 on raising company security awareness, TSA will solicit voluntary feedback from pipeline companies seeking to utilize the CD-1. TSA will collect the feedback regarding CD-1 performance via an online survey site, managed by TSA. The survey results will be used to guide TSA on future pipeline transportation security initiatives. TSA plans to conduct the data collection over a two- to three-year period, in order to allow for maximum distribution and use of CD-1 throughout the industry, and for participating companies to complete full training cycles.

- 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.***

In order to participate, interested companies may respond to TSA's announcements regarding the CD-1 availability and ordering instructions through all applicable pipeline industry Web sites. The CD-1 training will be available to all pipeline companies upon request to TSA. Participation in the feedback survey will also be voluntary for those pipeline companies that request and receive the CD-1.

TSA will contact the companies who requested and are sent the CD-1 (via the email contact address provided on the CD-1 request form) via email, and request that the companies log on to a TSA-managed secure Web site to provide feedback on the effectiveness of the training.

Respondent companies may respond with feedback in one of two ways: (1) they may choose to submit one subjective, corporate response as to the employee participation levels or effectiveness of the CD-1 (i.e., The CD-1 significantly increased the security awareness levels for a majority of Company X's employees.); or (2) they may provide objective information based on their company's own survey of its employees. For metrics purposes, TSA will also request that participating companies provide the total number of company employees, the number of employees who have completed the CD-1 training, and the numbers of projected employees that will complete the training in the future. In many cases, a single company may own more than one pipeline transmission or local distribution system, thus, a single CD-1 and corresponding effectiveness responses may represent more than one individual pipeline system. In order to discern the total number of pipeline companies utilizing the CD-1, TSA will inquire as to the number of individual pipeline systems that will be using the CD-1, in the event a parent company is requesting the CD. However, because participation in the CD-1 training and providing feedback is voluntary (that is, some companies that may utilize the CD-1 may not provide feedback), TSA metrics will be based solely on companies that provide feedback.

In order for interested companies to submit information, TSA will set up a separate file for each company on the secure Web site into which each company can provide feedback. TSA will provide each company or individual pipeline system with a password in order to access their individual company or system file. Companies/individual systems may access and update the information contained within their file at any time. TSA will use the name of the participating company or point of contact information only for purposes of setting up the company feedback file and for identity verification when companies log into the Web site.

The primary use of this information is to allow TSA to assess the effect of the CD-1 project on raising the baseline level of security awareness within the pipeline industry. The secondary purpose of this information is for TSA to obtain, based on individual company input, an indication of CD-1 user participation and employee participation levels throughout the pipeline industry.

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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]***

In compliance with GPEA, the survey is conducted electronically. A company choosing to participate in the survey will access a TSA Web site/page specifically designed for conducting surveys via the Internet and provide single word or number responses to

approximately ten questions, and then save the document in the company's folder or data space.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.**

TSA is seeking a unique response as to the effectiveness of the CD-1 at raising the security awareness levels of pipeline company employees. Additionally, no centralized training database where similar training information is collected currently exists.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden...**

This collection does not have a significant impact on a substantial number of small businesses.

- 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 this collection were not conducted, TSA would be unable to assess the effectiveness of its security awareness training CD-1.

TSA has opted to conduct this collection electronically, and participating companies may provide or update their feedback at their convenience, which TSA expects to be of minimal burden to each company.

- 7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d) (2).**

This collection will be conducted consistent with the information collection guidelines.

- 8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

TSA spoke with several pipeline companies and none expressed any indication of existing surveys similar in nature to this survey. TSA also consulted the Department of

Transportation (DOT), the primary pipeline regulator for safety, about the existence of training survey programs. DOT informed TSA they do not have or conduct surveys of a similar nature.

As required by 5 CFR 1320.8(d), TSA published a 60 day notice in the Federal Register soliciting comments on the information collection on **January 31, 2007 (72 FR 4526)** and a 30 Day notice in the Federal Register on **December 3, 2007 (72 FR 67944)**.

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

No payment or gift will be provided to respondents.

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

TSA does not provide any assurances of confidentiality to respondents.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No sensitive questions are posed.

12. Provide estimates of hour burden of the collection of information.

Out of approximately 2,200 individual pipeline companies in the United States, TSA estimates that, on an annual basis, an average of 300 companies will provide feedback on the CD-1. TSA estimates the average hour burden per response, per pipeline company or system, will be approximately 20 minutes. Assuming that, on average, a company will provide feedback twice per year, TSA estimates the total annual hour burden will be 40 minutes per pipeline company or system. Therefore, TSA estimates the total annual hour burden will be approximately 200 hours per year for all pipeline industry participants [300 companies X 40 minutes = 200 hours].

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no costs to respondents as a result of this collection

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

In order to manage the survey site and data, there will need to be an electronic information repository. The TSA cost to develop and maintain the web based survey site and associated database is approximately \$1,000. (Based on market research the approximate cost for these

services from a contractor would be approximately \$40,000 for the initial Web page and database set-up, and between \$2,000 and \$3,000 per year for site and database management and reporting)

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 submission; therefore, there are no changes.

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 results will not be published.

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.

Not applicable.

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

No exceptions noted.