

## **Supporting Statement for Paperwork Reduction Act Submissions**

### **Critical Infrastructure/ Key Resources Private Sector Clearance Program (CI/KR PSCP)**

**OMB Control Number: 1670-NEW**

#### **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.

Partnerships between the US Government and the Private Sector at times necessitate the sharing of classified information. The Critical Infrastructure/Key Resources Sector Clearance Program facilitates this sharing by sponsoring security clearances for certain members of each sector based on either their membership on a Sector Coordinating Council (SCC)/association or their job. In order to begin this process, their employment information as well as some Personally Identifiable Information (PII) is collected in order for the applicant to be approved to participate in the clearance program. Their association/SCC membership or employment information is reviewed for approval and their PII is used by the DHS Office of Security Personnel Security Division to input into e-QIP.

The US Government is authorized to ask for this information under Executive Order 12958 (as amended by Executive Order 13292); and Executive Order 12968, which authorize the collection of this information.

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.

#### **CI/KRs Sector Clearance Program Clearance Request Form**

The Critical Infrastructure/ Key Resources Clearance Program (CI/KRsSCP) is designed to provide private sector individuals clearances so that they can be partners with DHS. These partners are subject matter experts within specific industries and have specific knowledge not available within the DHS agency. Private citizens do not receive monetary compensation for their time. Because these individuals are not associated with another federal agency and they must have clearances, DHS has created this program to grant clearances to private citizens. The CI/KR SCP requires individuals to complete a form that initiates the clearance process. The data from these forms make up the Master Roster. The Name, Social Security Number, Date of Birth and Place of Birth are then entered into e-QIP - Office of Personnel Management's secure portal for investigation processing. Once the data is entered in e-QIP by the DHS Office of Security, Personnel Security Division, and Personnel Security Specialists then the applicant can complete the rest of the e-QIP security questionnaire. The CI/KRs Master Roster contains all the

information found on the clearance request form in addition to their clearance info (date granted, level, date non-disclosure agreements signed.) The Administrator of the Master Roster maintains the information so as to track clearance processing and investigation information (date of investigation) and to have the most current contact information for the participants from each sector.

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.

Each applicant fills in their information and emails the form to the appropriate sector specialist.

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.

There is a form being used by the State and Local Clearance Program that asks for the same type of information however it does not have a DHS form number and it is designed specifically for State and Local government individuals. In addition, the DHS Form 9014 gets the process started with the Office of Security so that they get the SF-86 sent out and then passes that on to OPM to get the investigation started. The collection of information is also used for internal purpose, to show auditors why individuals need a clearance and who nominated them.

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 form does not negatively affect small businesses.

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.

The mission of the CI/KRs Sector Clearance Program is to facilitate the clearance process for members of the Private Sector. Information sharing between the Private Sector and the government is critical to protect the nation's resources. There are times when the information or locations discussed or visited may be access restricted. The information collected from each applicant is strictly for the purpose of authorizing the individual to receive that classified information.

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.

The applicant is required to fill this form out once to be approved for participation in the program.

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

Respondents are not required to send a written response regarding this collection.

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

Individuals are not required to submit more than one copy via email.

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

The CI/KR form does not require individuals to retain the record for any specific length of time.

(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.

This collection does not utilize statistical analysis.

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

This collection does not utilize statistical analysis.

(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.

This form does not include a pledge of confidentiality that is not supported by established authority in Section 201 of the Homeland Security Act; Executive Order 12958 (as amended by Executive Order 13292); and Executive Order 12968 which authorize the collection of this information.

(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.

No proprietary or trade information is requested from the individuals.

## 8. Federal Register Notice:

On March 3, 2008, the Department published a 60 Day Federal Register Notice at 73 FR 12746. There were no comments received. On May 15, 2008, the Department published a 30 Day FRN at 73 FR 28127, there were no comments received.

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

No gifts or payments of any kind will be provided to the respondents of this information collection.

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

This form does not include a pledge of confidentiality that is not supported by established authority in statute or regulation.

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 asked on DHS Form 9014.

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.

CI/KRsSCP individuals are required to complete the form once at an average of 10 minutes per response. The annualized cost for all respondents to complete the form is \$2,940.00. The table below shows the annual hourly and cost burden rate.

Table A.12: Estimated Annualized Burden Hours and Costs

Form Name	Form Number	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
CIKR Sector Clearance Program Request	DHS Form 9014	250	1	.1667	42	\$70.00	\$2,940.00

Total		250			42		\$2,940.00
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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.)

There is no record keeping, capital start-up or maintenance cost burden to the respondent 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.

There is no additional cost to the federal government for this information collection. The operational expenses, administrative review and staffing costs are built into the already existing budget for the program office.

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 is a new information collection request.

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.

This information collection will not be published for statistical purposes.

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

The Program office is not seeking this exemption.

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

There are no exceptions to the certification statements identified for this collection.