Supporting Statement for Paperwork Reduction Act Submissions

Title: Protected Critical Infrastructure Information (PCII) Program Survey

OMB Control Number: 1670-NEW

PRA 1670_PCII Program Survey 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.

The Protected Critical Infrastructure Information (PCII) Program was created according to the Critical Infrastructure Information (CII) Act of 2002, the Department of Homeland Security (DHS) to encourage voluntary information sharing by owners and operators of critical infrastructure and protected systems. The PCII Program is implemented by 6 CFR Part 29, Procedures for Handling Critical Infrastructure Information; Final Rule (the Regulation), which was issued in 2006. PCII refers to validated critical infrastructure information not customarily in the public domain and related to the security of critical infrastructure or protected systems, which is voluntarily submitted to DHS for homeland security purposes. The PCII Program offers protection from public disclosure through the Freedom of Information Act (FOIA), State and local sunshine laws, and civil litigation. The PCII Program is administered out of the Infrastructure Information Collection Division (IICD) in the Office of Infrastructure Protection (IP).

The PCII Program helps government analysts, emergency responders, and other homeland security professionals' access data about facilities and systems on which the country depends. The PCII Program Office (PCII PO) is responsible for ensuring compliance with the Regulation's uniform procedures for the handling, use, dissemination, and safeguarding of PCII. In this capacity, the PCII PO oversees a community of stakeholders, including submitters of CII, authorized users of PCII and accredited Federal, State and local entities with homeland security duties. The PCII Program provides standardized training for these stakeholders to become PCII Authorized Users and PCII Officer/PCII Program Manager Designees. To further its mission, the PCII Program requires supporting information from these stakeholders regarding its training programs and overall performance. The information collected by this survey serves this purpose. The survey data collected is for internal PCII PO, IICD and IP use only.

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.

Nationwide demand for PCII Program training will continue as long as Federal, State and local government analysts, emergency responders and other homeland security professional require access to data about the critical infrastructure and systems on which the country depends. To respond to that need, PCII Program training is provided in multiple locations monthly and through individual Web-based training modules.

The PCII Program survey evaluates stakeholder satisfaction with this training. The survey supports data-based decision-making by evaluating quantitative and qualitative data to identify improvements and significant issues based on customers' experience. Obtaining current, fact-based actionable data about training features allows the program to recalibrate its resources to address new or emerging issues and provide more effective PCII training. The survey data collected is for internal PCII PO, IICD and IP use only.

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 PCII Program survey is administered on paper for PCII Office/PCII Program Manager Designee instructor-led sessions, which impacts only a small number of participants (approximately 60 respondents per year). The survey is integrated at the end of the training by instructors handing out the survey form and having participants return it in a sealed envelope back to the instructor. PCII Authorized User Web-based training participants are given a Web link to the survey at the end of the training modules, and are reminded to complete the survey in generic e-mail messages generated by the PCII PO when participants request certificates of completion for the training course. The Web-based version of the survey reduces respondent staff burden of manually administering a survey, accurately collecting data and integrating the survey as part of the training course. Since the survey is part of the course and not a separate activity, response rates are expected to be high. Automation also captures participants' typed comments, eliminating time-consuming transcription and manual inaccuracies.

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 currently 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.

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.

Without this information, the PCII PO's ability to evaluate and improve training and fulfill customer requirements for relevant information on the handling, use, dissemination, and safeguarding of PCII would be reduced, and the risk of misuse, abuse or unauthorized release of PCII might increase.

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.

This information collection is conducted in a manner consistent with the guidelines in 5CFR 1320.5(d) (2).

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.

On March 28, 2008, the Department published a 60 Day Federal Register Notice 73 FR 16696.

There were no comments received.

On June 3, 2008, the Department published a 30 Day Federal Register Notice at 73 FR 31704-31705).

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.

The survey instrument states that the information will be kept private or anonymous to the extent allowable by law. The PCII Program survey does not collect sensitive or proprietary information. It is a voluntary survey, not requiring nor imposing any conditions for participation. Data collected is for internal PCII PO, IICD and IP use only.

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.

During a pretest of the survey instrument is was determined that completion time, depending on the amount of comments, is approximately 8 minutes.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form 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
PCII Officer/PCII Program Manager Designee	PCII Program Training Survey	60	1	.1333	8	$34.83	$278.64
PCII Authorized Users	PCII Program Training Survey	3,000	1	.1333	400	$27.72	$11,088.00
Total		3,060			408		$11,366.64

The average hourly wage reflects varied skill sets including homeland security professionals, submitters of CII, and first responders who would reasonably be expected to complete PCII Authorized User or PCII Officer/Program Manager Designee training. The $34.83/hr hourly wage rate for PCII Officers/Program Managers Designees is based on series 11-9199 State government managers-other. The $27.72 hourly wage rate for Authorized User Training was derived by averaging the mean hourly wage estimates of for typical Authorized User Training participants ($26.82hr. for 33-3051 series, $23.96/hr for 13-1061 series, and $32.38/hr for 33-1021 series). All hourly wages are from Bureau of Labor Statistics Wage Data as of May 2007 (http://www.bls.gov/bls/wages.htm).

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 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 record keeping, 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.

IICD has purchased access to a Web-based survey programming tool, Vovici EFM Feedback, which allows for survey programming, administration, and basic data analysis. The financial costs for collecting information will decrease dependent on the number of surveys automated using this tool. The initial application cost $1,250.00 with an annual $1,000 maintenance fee. However, these fees cover the PCII survey and surveys for other IICD programs. The cost per survey will diminish as the tool is used for other surveys. However, if no other surveys use the application in FY08, the cost will total $2,250.00.

The other cost to the Federal Government will be the salary of the Federal and contract/support staff that design, administer and review this material. The level of staff that design, administer, and analyze the collected materials may vary from a GS-11 to a GS-13 salary. The average hourly wage for GS-11/GS-12/GS-13 personnel from GS Salary tables for 2008 Washington, D.C. area locality pay is $38.74. Estimates are that it takes 40 hours to review, analyze and create each quarterly report (4 reports) and annual report (1 report) and 100 hours for survey design and administration.

Cost Category	Form Name	Hours for Design/ Administration	Hours per Report	Number of Reports	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
Programming tool	PCII Program survey	NA	NA	NA	NA	NA	$2,250
GS 11/12/13 personnel	PCII Program survey	100	40	5	300	$38.74	$11,622.00
Total					300		$13,872.00

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 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.

The PCII program will not publish the PCII Program survey results and they are for internal use only. All survey reporting is internal to IP, IICD, and the PCII PO. Survey results will be used at the IP level for reporting of performance metrics. The PCII Program survey will be analyzed using frequencies and cross tabulations in SPSS statistical software. Weighting will not be performed because population parameters are unknown and data is not estimated to the population. Data is aggregated quarterly and annually to identify areas in need of improvement and identify trends. Data is collected on a continuous basis with surveys administered at the conclusion of each instructor-led or Web-based training session which are scheduled throughout the year or taken on an individual basis.

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

IICD 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.

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