

**Supporting Statement for Paperwork Reduction Act Submissions
Critical Infrastructure Key Resources CIKR Asset Protection Technical Assistance Program
(CAPTAP) Train-the-Trainer Survey**

OMB Control No: 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.

The U.S. Department of Homeland Security (DHS) is the lead coordinator in the national effort to identify and prioritize the country's critical infrastructure and key resources (CIKR). At DHS, this responsibility is managed by the Office of Infrastructure Protection (IP) in the National Protection and Programs Directorate (NPPD). The legal authority for IP comes from the Homeland Security Act of 2002 and Homeland Security Presidential Directive 7 (HSPD-7), Critical Infrastructure Identification, Prioritization, and Protection. IP actively collects and manages infrastructure data and provides tools to Federal, State, local, tribes and territories to enable them to share data and protect their own critical infrastructure.

The Critical Infrastructure Key Resources (CIKR) Asset Protection Technical Assistance Program (CAPTAP) offers State and local first responders, emergency managers, and other homeland security officials training to develop comprehensive CIKR protection programs in their respective jurisdictions; access to the Constellation/Automated Critical Asset Management System (C/ACAMS) tools for using CIKR asset data, prevention and protection information; and incident response and recovery plans to make their communities safer. To ensure that interested parties appropriately advance this mission, C/ACAMS provides CAPTAP Train-the-Trainer (TTT) sessions to State and local government officials to so that they may then train their colleagues through CAPTAP services. The survey measures customer satisfaction with the training provided through the CAPTAP TTT course. The C/ACAMS Program Management Office (PMO) is administered out of the Infrastructure Information Collection Division (IICD) in the Office of Infrastructure Protection (IP). The survey data collected is for internal C/ACAMS PMO, 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.

The survey data collected is for internal C/ACAMS PMO, IICD and IP use only. The C/ACAMS PMO evaluates the CAPTAP TTT customer survey to determine levels of customer satisfaction with the CAPTAP TTT training and areas in need of improvement. The survey supports data-based decision-making because it evaluates quantitative and qualitative data to identify improvements and identify significant issues based on what customers' experience. Obtaining current fact-based actionable data about the training allows the program to recalibrate its resources to address new or emerging issues.

A CAPTAP Service ID number is given to each training session (not an individual) to help identify the training session associated with feedback received through the survey instrument for improving future training events.

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 survey is administered using a Web-based survey tool, Vovici Enterprise Feedback Management (EFM). Automating the CAPTAP TTT survey reduces the 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 survey is not associated with any other collection. However, there is another survey used for the program CAPTAP, which is currently an approved collection. The OMB Control No. for that collection is 1670-0011.

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 collecting information as requested, C/ACAMS PMO will be unable to evaluate and improve CAPTAP TTT training for State and local government instructors.

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.

60 Day Federal Register Notice: Monday, September 14, 2009 (Volume 74, Number 176), Page 47013. There were no comments received.

30 Day Federal Register Notice: Tuesday, December 15, 2009 (Volume 74, Number 239), Page 66371. 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.

CAPTAP TTT does not collect any Personally Identifiable Information (PII). The CAPTAP TTT 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 C/ACAMS PMO, 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.

During a pretest of the survey instrument it was determined that completion time, depending on the amount of comments, is approximately 12 minutes.

The CAPTAP TTT program trains approximately 25 trainees at six sessions annually, or 150 participants per year. The overall burden hours/cost is represented below (150 respondents x 12 minutes = 30 hours).

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
CAPTAP TTT Participants	CAPTAP TTT Survey	150	1	.20	30	\$46.22	\$1,386.60
Total		150			30		\$1,386.60

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.

Participants in the CAPTAP TTT are expected to be State and local government officials in management positions. The Department of Labor reports a median hourly wage of \$46.22 for management occupations.

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 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 CAPTAP TTT 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 60 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	CAPTAP survey	NA	NA	NA	NA	NA	\$2,250
GS 11/12/13 personnel	CAPTAP TTT survey	60	40	5	260	\$38.74	\$10,072.40
Total					300		\$10,072.4

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.

The C/ACAMS PMO program will not publish the CAPTAP TTT survey results and they are for internal use only. All survey reporting is internal to IP, IICD, and the C/ACAMS PMO. Survey results will be used at the IP level for reporting of performance metrics. The CAPTAP TTT 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 CAPTAP TTT training session which are scheduled throughout the year.

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.