

Supporting Statement for Paperwork Reduction Act Submissions

Title: Methodology Technical Implementation (MTI) Functional Survey

OMB Control Number: 1670-NEW

MTI Functional 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 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 Methodology Technical Implementation (MTI) Project Office supports the 18 critical infrastructure and key resource (CIKR) sectors by integrating risk and vulnerability assessment methodologies into automated tools. MTI efforts address the unique needs and requirements of each sector by working with sector partners to develop tailored solutions that enable the identification, analysis, and management of sector-specific security risks. The MTI team collaborates with Sector-Specific Agencies (SSAs), Sector and Government Coordinating Councils (SCCs and GCCs), and divisions within the Department of Homeland Security's Office of Infrastructure Protection. The MTI team also works with sector specialists, risk analysts, private sector individuals, and Federal agency representatives. Efficient and effective use of the MTI tools helps all CIKR sectors nationwide reach their goal of making their sectors safer and provides a way to comply with recommendations in the National Infrastructure Protection Plan (NIPP). To ensure that interested stakeholders achieve this mission, MTI requests opinions and information from users of the tool regarding tool functions and improvements. The MTI Project Office is administered out of the Infrastructure Information Collection Division (IICD) in the Office of Infrastructure Protection (IP). The survey data collected is for internal MTI, 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 MTI project creates automated tools to assist private sector infrastructure owners/operators in the collection and analysis of risk and vulnerability information with the goal of increasing infrastructure protection. Most of the tools are Web-based and the data col-

lected is for the use of the owners/operators to assess their own risks and vulnerabilities and help them better protect their assets from damage or destruction. The users of the tools are private sector owners/operators wishing to assess risks and vulnerabilities to their facilities. The survey has been designed to capture similar data for each of the tools and in administering the survey, users would be stratified based on the tool they use and a sample of those users will be invited to participate in the survey.

The data collected in this survey will be used by the MTI project to improve the user experience with these automated tools to ensure they are a useful resource for private sector owners/operators in protecting infrastructure.

The survey asks users to assess the tools and provide feedback that will assist in improving the tools functionality and reports.

The survey data collected is for internal MTI Project Office, IICD and IP use only. The MTI Project Office will use the results of the Functional Survey to determine levels of customer satisfaction with the MTI tools and prioritize future improvements of key tool functions. The results will also allow the program to appropriate funds cost-effectively based on user need, and cost savings while improving the tool.

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 MTI Functional Survey reduces the respondent burden of responding to a paper survey or a telephone interview. The staff burden of manually administering a survey and accurately collecting data is also reduced. 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 collecting the information as requested, the MTI Project Office would be unable to operate effectively and efficiently because it will not be able to respond to user needs in a timely manner, update tool functionality accordingly, and adjust the applicability to the collection of CIKR 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.
- (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 47010. There were no comments received.

30 Day Federal Register Notice: Tuesday, December 15, 2009 (Volume 74, Number 239), Page 66369. There were no comments received.

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.

The MTI Project Office, working under the NIPP partnership model, will form a MTI working group within each of the sectors to serve as the mechanism for reviewing requirements for the Functional Survey. This group, consisting of an estimated 20 members, will be responsible for reviewing, editing and reporting recommendations back to IP and the MTI Project Office. The MTI sector working groups will have reviewed the survey instrument to ensure the questions are answerable by the user community and cover the appropriate topics.

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 Functional Survey does not collect sensitive or proprietary information. The survey instrument states that the information will be kept private or anonymous to the extent allowable by law. It is a voluntary survey, not requiring nor imposing any conditions for participation. Data collected is for internal MTI Project Office, 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.

MTI Functional Survey participants are MTI tool users and stakeholders in the program. This is expected to be an annual survey, taken only once by an individual in a given year. The number of tool users is expected to increase each year, so estimates are given based on a stratified sample of expected users for each tool over the next three years. The average total annual projected burden hours are 1,375.

During a review of the survey instrument it was determined that completion time, depending on the amount of comments, is approximately 15 minutes.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name	No. of Respondents (sample)	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate*	Total Annual Respondent Cost
MTI users Year 1	MTI Functional Survey	3,700	1	.25	925	\$23.65	\$21,876.25
MTI users Year 2	MTI Functional Survey	5,670	1	.25	1417.5	\$23.65	\$33,523.88
MTI users Year 3	MTI Functional Survey	7,135	1	.25	1783.75	\$23.65	\$42,185.69
Estimated Average Totals		5,502	1	.25	1375		\$97,585.81

* Average hourly wage rate referenced in U.S. Dept. of Labor, Bureau of Labor Statistics (BLS) found at <http://www.bls.gov/oes/>.

The average hourly wage reflects varied skill sets from managers and analysts who would reasonably be expected to use the MTI tools. The \$23.65 hourly wage rate was derived by averaging the mean hourly wage estimates of typical MTI users: Bureau of Labor Statistics/Occupational Employment Statistics series 33-1099/\$22.55 and 13-1061/\$24.75.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 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 2009 Washington, D.C. area locality pay is \$40.60. Estimates are that it will take 150 hours to design and administer the MTI user survey and 300 hours to review, analyze and create a comprehensive quantitative and qualitative report.

Cost Category	Form Name	Hours for Design/ Administration	Hours for Reporting	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
Programming tool	User Survey	NA	NA	NA	NA	\$2,250
GS 11/12/13 personnel	User Survey	150	300	450	\$40.60	\$18,270.00
Total				450		\$20,520.00

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 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 MTI Project Office will not publish the MTI Functional Survey results as they are for internal use only. All survey reporting is internal to IP, IICD, and the MTI Project Office. Survey results will be used at the IP level for reporting performance metrics. The MTI survey will be analyzed using frequencies and cross tabulations in SPSS statistical software. Administration of the survey will take approximately six to eight weeks. Quantitative and qualitative analysis will take approximately 30 days once the survey is closed. Internal reporting will occur approximately 30 days after the start of analysis.

Activity	Timeframe
Select sample	15 days from OMB approval
Administer survey to selected sample	20 days from OMB approval
Analyze results	75 days from OMB approval
Internal survey reporting	105 days from OMB approval

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.