

**Chemical Facility Anti-Terrorism Standards
Request for a Revision to OMB Collection 1670-0007**

The request for a revision to OMB Collection 1670-0007 is based upon the need to update the burden estimates based upon historically collected data as well as minor improvements to the instruments due to maturing of the CFATS regulatory program since its inception in April 2007.

The “Questions” in the location column refer to the questions in Statement A.

Table of Changes:

Location	Old	New
QUESTION #1: Circumstances that make the collection of information necessary.	Early descriptions of the program used in April of 2007.	<ul style="list-style-type: none"> • Improved the text to reflect more recent descriptions of the program • Added a section that outlines the history of the collection since implementation
QUESTION #2: By whom, how, and for what purpose the information is the information to be used	Broad discussion of regulations.	Clarified the scope of this collection in preparation of other information collection associated with this regulatory program.
QUESTION #2 CSAT Helpdesk Instrument	Broad discussion of helpdesk.	Improved clarity about information collected through this instrument.
QUESTION #2 Chemical-terrorism Vulnerability Information Instrument	Instrument was updated through a change request in Nov 08.	Updated to collect additional PII to allow user to access their CVI account.
QUESTION #2 CSAT User Registration Instrument	Broad discussion of User Registration.	Improved clarity about information collected through this instrument.
QUESTION #2 CSAT Top Screen Instrument	Broad discussion of Top Screen.	Improved clarity about information collected through this instrument.
QUESTION #2 CSAT SVA & ASP in lieu of an SVA Instrument	Justification for single collection.	Improved clarity about information collected through this instrument.

Location	Old	New
QUESTION #2 CSAT SSP & ASP in lieu of an SSP Instrument	Justification for single collection.	Improved clarity about information collected through this instrument.
Question #3: Consideration of the use of improved information technology		Minor improvements and clarity to text.
Question #5: Methods to minimize the burden to small business if involved.	Discussion about the use of technology to dynamically generate questions tailored to facility.	Clarified that no unique methods will be used to minimize burden on small businesses.
Question #6: Consequences to the federal program if collection were conducted less frequently	General reference to 6 CFR 27.210 which outlines the regulatory compliance schedule in CFATS.	<ul style="list-style-type: none"> • Reiterates 6 CFR 27.210 • Mentions compliance schedules may be found in an approved Site Security Plans • Clarifies that the department can require a facility to resubmit if the submission has an error or is unacceptable • Clarifies that the department can require the facility to submit new information necessary to re-evaluate the facility
QUESTION #12: Estimates of reporting and recordkeeping hour and cost burdens of the collection of information	Burden estimates based upon regulatory evaluation published in April 2007 and professional judgment of program manager	Burden estimates base upon historical data collected since implementation in April 2007.
QUESTION #14: Estimates of annualized Federal Government costs	Estimate based upon estimates in April 2007	Estimate based upon historical data and current budget projections

Location	Old	New
QUESTION #15: Explain reasons for the change in burden		Burden estimates now based upon historical data collected since implementation in April 2007.