

**SUPPORTING STATEMENT**  
**Chemical Security Awareness Training Program (CSATP)**  
**OMB Control No.: 1670-0009**

**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 security of chemical facilities in the United States has been and is a high concern of the public and governmental agencies. Under Homeland Security Presidential Directive 7 (HSPD-7) (issued December 2003), DHS issued the National Infrastructure Protection Plan (NIPP) on June 30, 2006 (updated March 2009). The NIPP requires Sector-Specific Plans (SSPs), annual reports to the Secretary of Homeland Security, and “several types of informational reports to support efforts to protect CIKR [critical infrastructure and key resources]. They cover subjects such as CIKR common vulnerabilities, potential indicators of terrorist activity, and best practices for protective measures.” (2009 Appendix 3B, p. 151) DHS has developed a Chemical Sector-Specific Plan (CSSP), which includes providing best practice guidance in partnership with the chemical sector.

The Chemical Sector-Specific Agency (SSA), within DHS Sector-Specific Agency Executive Management Office, is seeking improvements in security of CIKR chemical facilities and general chemical facilities through the Chemical Security Awareness Training Program (CSATP) and other actions. Collection of information about the participation in the program, such as number of participants, type of facility, location of facility, percentage completion of the training, is needed for assessing the success of the training program.

- 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.**

*CSATP Registration Information*

The collected information at registration is used to monitor the participation of chemical sector facility employees in the training program as indicators of degree of participation, coverage of participation by sub-sector and location, and success/failure rates in completion, to determine whether corrective or additional actions are needed. The information is used by the Chemical Sector-Specific Agency, within DHS, in partnership with the chemical sector. This collection affects private sector employees.

*CSATP Module Information*

The only information collected in the CSATP Training Module occurs at the completion of the training. The trainee is prompted to enter his/her name in a specific section so that they can receive a certificate of completion from the Chemical SSA

(sample attached). The certificate is then generated once the name is entered and can be printed. The information is only stored on the system during the time in which the certificate is generated. It is deleted thereafter.

### *CSATP Survey Information*

The information collected in the survey portion of the CSATP Training is used to monitor feedback from users of the training. If there are issues in the content of the training or technical issues identified through the survey, this feedback is used by the Chemical SSA to improve the program.

- 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 collection of information in each section of the CSATP involves use of automated, electronic techniques. The burden is greatly reduced, being limited to entry of a few items on web pages (<https://www.chemicalsecuritytraining.com>) during the on-line registration process at the beginning of the training and the CSATP Survey at the end of the training.

- 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 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 burden.**

The collection of the information is already minimal and automated by electronic collection during the process of registration for the training. An additional capability specifically added for small businesses and small entities is the provision of a low-bandwidth (dial-up connection) version of the training for use when high-speed and higher cost internet connection is not available to the general employee.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the information is not collected during registration and the training process, much more costly and cumbersome methods to distribute the training program would be required. These could include production and distribution of software on CDs with printed instructions, with administrative controls on distribution, and filing of periodic reports by large and small businesses. If such information as the location, type of facility and number of employees is not

electronically collected at the time of registration for the training, DHS will be unable to judge the success of distribution, awareness and adoption of the training program though out the chemical sector. A consequence of failure of broad adoption of the training would be a general reduction in the security of chemical facilities and therefore failure to achieve objectives of the National Infrastructure Protection Plan, the Chemical Sector-Specific Plan, and the President's Directive on Homeland Security.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner [inconsistent with guidelines].**

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

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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 Comment Period: A 60-day public notice for comments was published in the Federal Register on August 27, 2010 at 75 FR 52768-69. 0 comments were received.

30 Day Comment Period: A 30-day public notice for comments was published in the Federal Register. 0 comments were 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.**

The information will be kept private or anonymous to the extent allowable by law. CSATP has been included under the Department of Homeland Security General Contact Lists' Privacy Impact Assessment dated June 15, 2007.

- 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 person's form whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of sensitive nature asked.

**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.**

The direct employment of the U.S. Chemical industry is about 850,000 (latest figures, 2009, per publication by the American Chemistry Council). The training program is targeted for the general employee population of the chemical industry manufacturing, distribution and warehousing facilities; for purposes of this analysis, it is estimated that about half of the industry employees are in these facilities and may participate, i.e., about 400,000.

The training is voluntary. In general, there is not a Federal requirement that trainees complete this training annually, although they may do so, or may complete a refresher version.

Information is automatically collected during the registration, training, and survey sessions. Trainees may suspend training before completion, and may later return and log-on to the program to continue training, in as many sessions as suits their individual situation. Therefore, collection of data could take place over several sessions, or could be completed in only one session. Most trainees are expected to complete training in one session.

*CSATP Registration*

The CSATP registration asks the user to provide the following information:

- User ID created specifically to access the training
- Password created specifically to access the training
- Confirmation of the password
- Secret question in case the User ID and/or password are forgotten
- Answer to the secret question
- Company Type (there are six options in the drop-down box)
  - Chemical Manufacturing
  - Petroleum and Coal Products
  - Plastics and Rubber Products
  - User, Supplier, Distributor
  - Transportation or Warehousing

- Other
- Location Size ( there are four options in the drop-down box)
  - 1-25
  - 26-100
  - 101-500
  - 501 or more
- Company Name
- City
- State (All 50 states and the District of Columbia are included in the drop-down box)
- Is your facility covered by the Maritime Transportation Security Act of 2002? (Drop down box with “yes” or “no”)
  - This question is asked because if the drop-down box option “yes” is checked, then it gives the user access to an additional training unit regarding MTSA.

Responses to the information request on the Registration page are estimated to take five (5) minutes to complete.

#### *CSATP Training Module*

The CSATP Training is estimated to take forty (40) minutes to complete.

#### *CSATP Survey*

The CSATP Survey asks the user to provide the following information:

- The course was informative. (User is asked to mark one of the following options)
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree
- The information was relevant to my job.
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree
- The information was presented clearly.
  - Strongly agree
  - Agree
  - Neutral
  - Disagree

- Strongly disagree
- I was able to complete the course with no technical problems occurring.
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree
- The web site responded to my input in a timely manner
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree
- The website interface was user-friendly
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree
- The course exceeded my expectations
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree
- Which version of the training did you take?
  - The low-bandwidth version
  - The high-bandwidth version
  - I'm not sure which version
- Comments. (User is asked to provide any additional comments in the comment box)

Responses to the information request in the Survey section are estimated to take 10 minutes to complete.

Combined, the training and its information collections (Registration: 10 minutes; Training: 40 minutes; Survey: 10 minutes) should take no more than sixty (60) minutes.

**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.**

Using an estimated average general employee cost of \$40.00 per hour, the estimated annualized cost to employers of trainees (assuming that the trainee is paid for their time) is 40 times 1 hour times 400,000 or \$16 million annually.

<b>Instrument</b>	<b># of Respondents</b>	<b>Responses Per Respondent</b>	<b>Average Burden per Response (in hours)</b>	<b>Total Annual Burden (in hours)</b>	<b>Total Annual Burden (in dollars)</b>
CSATP Registration	400,000	1	.17 hours (10 minutes)	68,000	\$2,720,000
CSATP Module	400,000	1	.66 hours (40 minutes)	264,000	\$10,560,000
CSATP Survey	400,000	1	.17 hours (10 minutes)	68,000	\$2,720,000
<b>TOTAL</b>	<b>400,000</b>	<b>1</b>	<b>1.0 (hours) (60 minutes)</b>	<b>400,000</b>	<b>\$16,000,000</b>

**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 not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Estimated annualized cost to Federal Government is \$36,000 total, in two parts:

Expense Type	Expense Explanation	Annual Costs (in dollars)
CSATP O&M	Web hosting cost for bandwidth requirements for 400,000 trainees annually	12,000
	Outside Contractor services in administering website operation and database reporting (20 hours/month x \$100/hour)	24,000

- 15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.**

There are no changes in the information collected. There is no increase in burden on respondents.

- 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.**

DHS does not intend to employ the use of statistics or the publication thereof for this information collection.



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

The Chemical Sector-Specific Agency 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 Submission," of OMB 83-I.**

The Chemical Sector-Specific Agency does not request an exception to the certification of this information collection.