OMB CONTROL No.

SUPPORTING STATEMENT FOR
OFFICE OF INFRASTRUCTURE PROTECTION
STAKEHOLDER INPUT PROJECT
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 Homeland Security Act of 2002 and Homeland Security Presidential Directive 7 (HSPD-7) call for the Department of Homeland Security (DHS) to coordinate the overall effort to enhance the protection of the nation's critical infrastructure and key resources. Specifically, HSPD-7 states DHS "shall establish appropriate systems, mechanisms, and procedures to share homeland security information relevant to threats and vulnerabilities in national critical infrastructure and key resources with other Federal departments and agencies, State and local governments, and the private sector in a timely manner"[1]. DHS designated the Office of Infrastructure Protection (DHS/IP) to lead these efforts. Given that the vast majority of the nation's critical infrastructure and key resources in most sectors are privately owned or controlled, DHS/IP's success in achieving the homeland security mission for critical infrastructure protection and resilience is dependent upon how well critical infrastructure owners and operators and members of the general public understand the key concepts, are aware of their contribution to achieve a shared national goal, participate in public-private partnerships with DHS/IP and the Sector-Specific Agencies (SSAs), and are motivated to take action in improving their infrastructure. DHS/IP has several products, services, and programs and work with partners at the local, state and Federal levels to achieve their mission. However, DHS/IP has never conducted a comprehensive feedback assessment with the full range of its stakeholders to identify their needs and collect their feedback on the effectiveness of these products, services, and programs and on how they can be improved.

Additionally, the authority for the voluntary stakeholder surveys is the Government Performance and Results Act of 1993 (P.L. No. 103-62). "The purposes of this Act are to:···(3) Improve Federal program effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction; and (4) Help Federal managers improve service delivery, by requiring that they plan for meeting program objectives and by providing them with information about program results and service quality. Furthermore, this information collection aligns to the

1 http://www.dhs.gov/xabout/laws/gc_1214597989952.shtm#1

requirements established by the “Government Performance Results Act (GPRA) Modernization Act of 2010” (H.R. 2142) which requires that all federal agencies “establish a balanced set of performance indicators to be used in measuring or assessing progress toward each performance goal, including, as appropriate, customer service, efficiency, output, and outcome indicators.” Also, the Act defines customer service measure as “an assessment of service delivery to a customer, client, citizen, or other recipient, which can include an assessment of quality, timeliness, and satisfaction among other factors.”

DHS/IP is seeking clearance in this information collection request in order to better meet the requirements of GPRA and the Office of Management and Budget (OMB). DHS/IP will use the information collected to obtain feedback from stakeholders and to monitor performance and the achievement of its strategic objectives over time. Specifically, DHS/IP desires to collect information from its stakeholders in order to:

- Provide a baseline for the effectiveness of efforts to improve the security of the nation’s infrastructure;
- Assist in validating and achieving DHS/IP’s strategic and mission area objectives;
- Obtain a better understanding of the evolving infrastructure protection and resilience requirements of DHS/IP’s stakeholders;
- Assess the visibility and awareness of the critical infrastructure protection and resilience mission; and
- Assess the outreach efforts by DHS/IP, sector-specific agencies, and other partners engaged in the infrastructure protection mission.

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 data will be collected via an electronic survey managed by a third-party DHS consultant, who will store and analyze the data collected. The survey will be conducted to collect information on DHS/IP’s stakeholders’ level of satisfaction and assess their knowledge and perception with IP’s current products, services, and programs. IP’s stakeholders targeted for this survey include private industry partners, State and local government partners, and members of the Sector Coordinating Council (SCC); Government Coordinating Council (GCC); State, Local Territorial, and Tribal Coordinating Council (SLTTGCC); and the Regional Consortium Coordinating Council (RCCC).

The information collected will be analyzed to determine areas important to DHS/IP’s stakeholders, assess DHS/IP’s performance in these areas, and develop strategies to better meet their stakeholders’ expectations and achieve DHS and DHS/IP’s strategic goals. The data from the stakeholder surveys will be used in conjunction with data from other sources, such as interviews conducted with DHS/IP's Federal partners, specifically the Sector-Specific Agencies (SSAs), feedback and information received from the various councils (i.e. SCCs, GCCs, Federal Senior Leadership Council, etc.), and data collected via IP's products, services and programs, such as the Regional Resiliency Assessment Program (RRAP). The Stakeholder Input Project, which includes the surveying of IP's non-Federal stakeholders, is a priority of the Assistant Secretary and the scope of the project has already been communicated in various council meetings.

The results and analysis of the stakeholder survey will be used in IP's strategic planning process and will be reported to DHS/IP leadership in order to:

- Gain a baseline regarding whether DHS/IP is achieving its strategic goals;
- Obtain a better understanding of the evolving infrastructure protection needs and requirements of DHS/IP stakeholders; and
- Understand and gauge the satisfaction, effectiveness, and relevance of DHS/IP's communication and information sharing efforts and risk mitigation programs.

Additionally, survey results may drive the development of outcome metrics for DHS/IP's strategic planning efforts, as well as the identification of new initiatives and/or activities to better improve IP's services with its stakeholders.

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**.

Information will be collected through the use of electronic surveys via the worldwide web. The electronic survey will be developed using a web-based survey software with Secure Sockets Layer (SSL) technology. The SSL protocol encrypts the survey link and survey pages during all transmissions between the surveyor and respondents in order to protect user information. The web-based survey will also minimize respondent burden, where it allows the participant to provide information at a time that is convenient to him or her during the open survey period. The web-based survey software will allow for skip logic in the survey, thereby ensuring that respondents only read and respond to the questions that relate to them. Respondents will not need to provide any identifiable information such as name, email address, phone number, or to register when completing the electronic survey. The only information respondents will provide is whether they belong to the private or public sector and which of the 18 sectors defined in the 2009 National Infrastructure

Protection Plan (NIPP) they represent. There is also an optional question to identify the State where they are located. Finally, online surveys do not require any mailing costs or other monetary investment on the part of the participant.

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.**

A review of information collection requests (ICRs) from the Inventory of Approved Information Collections located online at http://www.reginfo.gov was conducted to determine that another similar information collection has not been implemented. Additionally, ICRs that are currently under review within DHS, but not yet forwarded to OMB, were also reviewed. None of the ICRs examined were similar to this information collection request. Based on this review, no other agency is conducting a survey with stakeholders involved in the security, protection, and emergency response of their organization's infrastructure and/or the infrastructure in a geographical area or region to collect their feedback on the effectiveness and their satisfaction with the current infrastructure protection products and services offered by DHS/IP. In addition to researching the REgInfo.gov website, DHS/IP has asked and confirmed with the SSAs that they are not or have not conducted a similar information collection effort.

Given that approved ICRs are added to the RegInfo.gov website on a daily basis, review of the website will continue. To the extent that any newly approved information collection request contains questions or instruments that are relevant to DHS/IP's information collection objectives, DHS/IP will incorporate them accordingly to further reduce the burden on the public. Additionally, all divisions within DHS/IP are aware of and are actively assisting in providing information to make this effort successful.

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 survey instrument associated with this clearance will utilize a web-based survey software and will be tested by various individuals from the DHS/IP staff to ensure that completion timeframes are kept to a minimum in order to minimize the burden on any small business that participates in this information collection effort and reduce the average respondent cost. The survey is voluntary, where the respondent is not obligated to respond.

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 DHS/IP is unable to conduct the information collection efforts associated with this clearance, it will not be able to assess how well it is accomplishing its mission and strategic goals, and will be more limited in its ability to meet the Government Performance and Results Act (GPRA) requirement for measurable performance objectives. Further, DHS/IP will not be able to fully assess the effectiveness of its products and services, measure progress, and implement the feedback loop mechanism that is essential to continuous improvement within the 2009 National Infrastructure Protection Plan's (NIPP) Risk Management Framework. Conversely, the collection efforts associated with this clearance will help DHS/IP better understand their stakeholders' needs, improve its products, services, and programs and, thereby, help DHS/IP remain relevant to its broad base of stakeholders across the 18 infrastructure protection sectors.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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; or**
- **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.**

The special circumstances contained in item 7 of the Supporting Statement are not applicable to any information collection associated with this clearance.

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.

No public comments were received during the 60-day Federal Register Notice (from November 4, 2010 to January 3, 2011) and the 30-day Federal Register Notice (from January 28, 2011 to February 28, 2011).

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Respondents of any information collection associated with this clearance will be informed that their responses shall be kept confidential to the extent allowable by law. In addition, no personal information (i.e., names, addresses) will be collected and no connection will be made between a respondent's identity and a completed questionnaire. There is no Privacy Act information involved with this data collection.

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 from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature will be asked in this survey.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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 desirable. 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.

- **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.**
- **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.**

Table 1 below provides an annualized estimate of the maximum time and cost effort for the information collection associated with this clearance. Average time burdens listed below are based on the result of tests conducted by DHS consultants and DHS/IP staff. Several individuals were timed while taking the survey in order to obtain the average time burden for this instrument. The survey time burdens account for reading and comprehension of instructions, questions, and answer choices, choosing responses, drafting open-ended questions, reviewing responses, and transmitting the completed survey. The result of these tests showed that it takes approximately 20-30 minutes to complete the survey.

The average hourly wage rate below is based on the Bureau of Labor Statistics; Occupational Employment and Wages, May 2008; 11-0000 Management Occupations (Major Group); Median Wage. The median wage has been calculated net of the chief executive wage rate, as the information collection associated with this clearance will not request participation from these stakeholders.

Table 1 - Estimated Respondent Burden for DHS/IP Stakeholder Input Survey

Information Collection Method	Type of Respondent	Form Name	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Surveys	CIKR Operators	Non Federal Stakeholder Input Survey	1800	1	0.5	900	$ 40.89	$ 36,801
	Coordinating Council Members		880	1	0.5	440	$ 40.89	$ 17,992
	First Responders and Local and State Emergency Management		600	1	0.5	300	$ 40.89	$ 12,267
	Totals		3280			1640		$ 67,060

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: (a) 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 or keep records for the government or (4) as part of customary and usual business or private practices**.

There will be no record keeping, capital, start-up, or maintenance costs associated with this survey.

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.

Table 2 below provides an annualized estimate of the cost to the Federal government.

Table 2 - Estimated Cost to the Federal Government

Expense Type	Expense Explanation	Annual Costs
Direct Costs to the Federal Government	DHS Project Manager (GS-15, Step 10 (as of January, 2009), .05 FTE)	$ 6,400
	DHS Program Specialist (GS-13, Step 10 (as of January, 2009), .1 FTE)	$ 9,200
Contractor and Other Expenses	Project Manager (.5 FTE)	$ 100,000
	Consultant (1.5 FTE)	$ 125,000
	Other Expenses	$ 17,500
	Total	$ 258,100

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

This is a new clearance.

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 results of the survey will be used by DHS/IP to analyze their stakeholder's satisfaction with its products, services, and programs and to make improvements. The results will be used for strategic planning purposes, and communications and briefings may be created to communicate the results to its stakeholders via council meetings or Assistant Secretary briefings.

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.

DHS/IP is not seeking approval to not display the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

DHS/IP is not requesting an exception to the certification requirements.

B. Collection of Information Employment Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. **Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

   The respondent universe consists of current or potential users of DHS/IP's products, services, and programs. Specifically, this respondent universe consists of the following:

   - Critical infrastructure and key resource (CIKR) owners and operators, first responders, and/or public sector officials from the following 18 critical infrastructure sectors:

Table 3 – Critical Infrastructure Sectors

Agriculture and Food	Banking and Finance
Chemical	Commercial Facilities
Communications	Critical Manufacturing
Dams	Defense Industrial Base
Emergency Services	Energy
Government Facilities	Healthcare and Public Health
Information Technology	National Monuments and Icons
Nuclear Reactors, Materials, and Waste	Postal and Shipping
Transportation Systems	Water

   - Within these 18 sectors, critical infrastructure owners and operators include private and public sector owners and operators in charge of the day-to-day security and protection of critical infrastructure. First responders and/or public sector officials include state, local, territorial, and tribal governments in charge of implementing the Homeland Security mission, protecting public safety and welfare, and ensuring the provision of essential services to communities and industries within their jurisdiction

The sample population for this information collection effort will be obtained from the following sources:

- Stakeholder contacts from the Protective Security Advisors (PSAs), consisting of approximately 5800 contacts
- Members of the 18 Sector Coordinating Councils (SCCs), 18 Government Coordinating Councils (GCCs), the State, Local, Territorial, and Tribal Government Coordinating Council (SLTTGCC), and the Regional Consortium Coordinating Council (RCCC)
- Stakeholders involved in the SLTTGCC Alliance network
- First responder contacts from the Emergency Services Sector-Specific Agency (SSA)
- Registered users of the Homeland Security Information Network (HSIN)
- Stakeholders contacts from the State Homeland Security Advisors (State HSAs)
- DHS/IP partner association members, where IP coordinates with over 700 associations

The expected response rate for this collection is 20%. The response rate during the first year of this collection effort will serve as baseline for future years and will allow DHS/IP to determine areas where additional focus is required in order to increase the response rate for this effort.

2. Describe the procedures for the collection of information including:

DHS/IP staff or third party contractor will conduct and monitor the Internet survey.

- **Statistical methodology for stratification and sample selection,**
  The sampling frame will be divided by critical infrastructure sector strata and whether they are infrastructure owner/operator or first responder.

- **Estimation procedure,**
  Respondent data will be summarized and no inferences will be made to a larger population.

- **Degree of accuracy needed for the purpose described in the justification,**
  For quantitative information collection efforts associated with this clearance, overall results, to the extent feasible, shall have at least a 95% confidence interval with ±5% margin of error, and important subgroup results shall have at least a 95% confidence interval with ±10% margin of error. Given the survey sample size and response rate, the confidence interval and margin of error will have sufficient statistical power to yield appropriate results.

- **Unusual problems requiring specialized sampling procedures, and**
  Specialized sampling procedures will not be needed for this survey.

- **Any use of periodic (less frequently than annual) data collection cycles to reduce burden**.
  DHS/IP intends to implement this survey biennially.

3. **Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied**.

Participation in the survey is voluntary. To maximize response rates, the following communications will be made:

Communications with general information on the survey sent prior to the survey

- Communication memos to the Sector-Specific Agencies with information on the project and its purpose
- Assistant Secretary speeches to the Federal Senior Leadership Council, SCCs, GCCs, RCCC, and the SLTTGCC regarding the project and the importance of receiving feedback from its stakeholders
- Frequently Asked Questions document provided to PSAs and other DHS/IP employees containing information on the project and how to answer questions regarding the survey
- Communication memos sent to the SCCs, GCCs, RCCC, and the SLTTGCC with information on the project and its purpose

Communications to be sent one or two weeks prior to the distribution of the survey

- Pre-written communication memos to be sent from PSAs to their stakeholders informing them of the survey and its importance and that they will be receiving an email with a survey link within the next two weeks
- Pre-written communication memos to be sent from SLTTGCC executive secretariat to the SLTTGCC Alliance membership informing them of the survey and that they will be receiving an email with a survey link within the next two weeks
- Pre-written communication memos to be sent from DHS/IP’s partner associations to their membership informing them of the survey and that they will be receiving an email with a survey link within the next two of weeks
- Pre-written communication memos to be sent from Deputy State HSAs to their stakeholders informing them of the survey and that they will be receiving an

email with a survey link within the next two weeks

Communications while survey is open for responses

- Email containing instructions and web link to the survey
  - o To track the response rate by stakeholder group, each web link sent to a specific stakeholder group will be different. However, the multiple web links will direct each respondent to the same survey
- Reminder email sent to potential respondents to respond to the survey prior to the closing date

The survey will be monitored as respondents are replying to the survey to determine if more communications are needed to specific stakeholder groups to improve the response rate

Additionally, the design of the survey will include the following approaches to maximize response rates:

- Incorporate skip logic into the survey questionnaire to ensure the respondents only answer questions that relate to them
- Pretest the survey questions with DHS/IP staff
- Pledge confidentiality to the extent allowable by law. No personal information (i.e., names, addresses) will be collected and no connection will be made between a respondent's identity and a completed questionnaire. There is no Privacy Act information involved with this data collection

4. **Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

   The survey has been tested by DHS consultants and DHS/IP staff for ease of comprehension and to test the amount of time to complete the survey. Test results show that the survey takes approximately 20-30 minutes to complete.

5. **Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency**.

The following individuals are providing continued oversight of the statistical aspects of the design and the collection and analysis of the information collected through the survey:

- Cristin Fullem, DHS/IP, 703-235-8147
- Jorge Fraga, JRD & Associates, Inc., 305-662-7228 ext. 303
- Isabel Stillone Behm, JRD & Associates, Inc., 305-662-7228, ext.302