

**SUPPORTING STATEMENT FOR
Biodefense Knowledge Management System
"FORM No. DHS 10043"**

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 Department of Homeland Security Science and Technology Directorate is coordinating the collection of Life Sciences Subject Matter Experts (SMEs) information with the Office of the Director of National Intelligence (ODNI), which operates under the authority of the National Security act of 1947, as amended by the Intelligence Reform and Terrorism Prevention Act of 2004. These authorities charge the ODNI with responsibility to coordinate and rationalize the activities of the Intelligence Community components. The SME information is necessary to understand who can provide scientific expertise for peer review of life science programs. In addition, the directory makes it easier to identify scientific specialty areas for which there is a shortage of Subject Matter Experts (SMEs) with appropriate security clearances.

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.

SME contact information, scientific expertise, and level of education is collected electronically through a web portal developed by DHS S&T and hosted at <https://bkms.llnl.gov/sme>. The SME information is shared with U.S. Government program managers and other members of the biodefense community who have a legitimate need to identify life sciences SMEs. Cleared SMEs are necessary to accomplish scientific reviews and attend topical meetings. Interagency data collection has only been under way for six months. In this timeframe we have provided information from the Directory to two agencies (White House National Security Staff and DTRA) for use in their planning for scientific program reviews.

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 SME Directory uses electronic (web-based) technology to collect, maintain, and transmit SME information. The SMEs have access to their own data and are able to edit and update the information electronically

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.

The National Counterproliferation Center has identified the need for a comprehensive and readily available list of life sciences SMEs that includes security clearance status. In particular, there is no database that contains security clearance information, biological domain expertise, and contact information. Therefore, the SME Directory is being coordinated at the national level to address this need. If a similar database is identified in the future, we will work with the identified collection agent to ensure a cooperative partnership is developed.

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.

This collection of information does not impact small businesses

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.

This database is necessary to identify SMEs who can assist with peer review of individual assessments and scientific programs and who can provide scientific expertise during a perceived biothreat event. In addition, the directory makes it easier to identify scientific specialty areas for which there is a shortage of SMEs with appropriate security clearances. Rapid access to this information is essential for rapid and effective response in the event of a perceived biothreat and to enable efficient and accurate assessment of classified scientific research.

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

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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.

This collection does collect information in any special circumstances.

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.

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

By notice in the **Federal Register** on July 22, 2011 (76 FR 18621), DHS S&T notified the public that it was requesting comments on this information collection. The notice allowed for a 60-day public comment period. No comments were received. DHS S&T

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then by notice in the **Federal Register** on October 26, 2011 (76 FR 27636), notified the public during a 30-day public comment period. No comments were received. Comments from government and contractor personnel both internal to DHS (National Biodefense Analysis and Countermeasures Center and Office of Intelligence and Analysis) and external to DHS (ODNI National Counterproliferation Center) have been solicited on database format and accessibility.

While we are in regular contact with the users and System Owner, no changes have been made to the collection and a formal consultation is not necessary.

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

DHS S&T does not provide payments or gifts to respondents in exchange for a benefit sought.

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

SMEs provide information voluntarily by entering it onto a secure website. Although they have the expectation of privacy, through their participation in the SME Database project SMEs have chosen to make explicit certain information about themselves, including contact information, professional information, and clearance information. However, because information is maintained on secure systems (at For Official Use Only (FOUO) level when collected on an FOUO website, and at TS/SCI when collected on the Joint Worldwide Intelligence Communications System network, respondents can be assured of levels of confidentiality at least equal to that provided by these systems.

The corresponding SORN is the S&T Research, Development, Test and Evaluation SORN. Federal Register: December 9, 2008 (Volume 73, Number 237), Pages 74743-74746. Docket No. DHS-2008-1060. A copy of the SORN can be found at <http://edocket.access.gpo.gov/2008/E8-29059.htm>.

The corresponding PIA is the Contact List PIA, approved by Chief Privacy Office Hugo Teufel on July 15, 2007. DHS PIAs are not published in the Federal Register, however they are published on the DHS public website. The Contact List PIA can be found at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_dhs_lists.pdf.

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

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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 a sensitive nature in this information collection.

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

DHS Form 10043	SME Registration Form
No. of Respondents	4,000
No. of Responses per Respondent	1
Avg. Burden per Response (in hours)	0.25
Total Annual Burden (in hours)	1000
Average Hourly Wage Rate	\$50
Total Annual Respondent Cost	\$50,000

Annual Reporting Burden and Respondent Cost: The total estimated ICR Public

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Burden in hours is 1000. This figure was derived by summing the total annual burden hours from the form. **The total annual number of respondents is 4,000.** This figure was derived by summing the number of respondents for this form.

Public Cost

The estimated annual public cost is \$50,000. This figure was derived by summing the estimated annual respondent costs for all forms.

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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 are no capital or start-up 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.

The estimated annual cost to the federal government in relation to this information collection is \$125,000. This includes the cost of equipment maintenance and the labor to

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maintain the web-portal.

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

There has been no increase or decrease to the number of respondents, responses, or annual hourly burden associated with this collection. In addition, there is no change to the information being collected.

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 S&T 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.

DHS S&T will display the expiration date of OMB approval for 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.

DHS S&T does not request an exception to the certification of this information collection.

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B. Collection of Information Employment Statistical Methods

Not applicable.