**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 historical data collected from January 2009 to December 2011. The revised burden estimates also reflect the growing maturity of CFATS, the removal of CVI Training and Authorization instrument from this collection, the addition of the Request to Improve Program Burden instrument, and the addition of recordkeeping costs.

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. | Descriptions of the program and a brief outline of the history of the information collection | Updated the history of the collection  Added a section about why NPPD is revising the Information Collection |
| **QUESTION #2**  Chemical-terrorism Vulnerability Information Instrument | Original instrument in collection | Removed since it is duplicated in IC 1670-0015 |
| **QUESTION #2**  Request for Information to Improve Program | Not included | Added to enable NPPD to obtain information to revise and improve CSAT to create a more efficient and effective tool for both industry and DHS based on industry engagement |
| **Question #3:**  Consideration of the use of improved information technology |  | The facilities may choose to obtain and submit signatures collected for CSAT users by using E-Signatures |
| **QUESTION #12:**  Estimates of reporting and recordkeeping hour and cost burdens of the collection of information | Burden estimates based upon historical data collected since implementation in April 2007 | Burden estimates based upon historical data collected from January 2009 to December 2011  The burden estimates also reflect the growing maturity of CFATS, the removal of CVI Training and Authorization instrument from this collection, the addition of the Request to Improve program Burden instrument, and the addition of recordkeeping costs |
| **QUESTION #14:**  Estimates of annualized Federal Government costs | Estimate based upon estimates in April 2007 | Revised Estimate |
| **QUESTION #15:**  Explain reasons for the change in burden |  | See answer to Q #12 above |