Supporting Statement for Paperwork Reduction Act Submissions

Title: Protected Critical Infrastructure Information (PCII) Officer Self-Assessment Questionnaire

OMB Control Number: 1670-NEW

Supporting Statement A

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 Protected Critical Infrastructure Information (PCII) Program is authorized by the Critical Infrastructure Information Act of 2002, 6 U.S.C §131 *et seq*., for the Homeland Security (DHS) to encourage voluntary information sharing by owners and operators of critical infrastructure and protected systems. The PCII Program is implemented by 6 CFR Part 29, Procedures for Handling Critical Infrastructure Information; Final Rule (the Regulation), issued in 2006. PCII refers to validated critical infrastructure information not customarily in the public domain and related to the security of critical infrastructure or protected systems, which is voluntarily submitted to DHS for homeland security purposes. The PCII Program offers protection from public disclosure through the Freedom of Information Act (FOIA), state and local sunshine laws, and civil litigation. The PCII Program is administered out of the Infrastructure Information Collection Division (IICD) within the National Protection and Programs Directorate's (NPPD) Office of Infrastructure Protection (IP).

The PCII Program helps government analysts, emergency responders, and other homeland security professionals, access data about facilities and systems on which the country depends. The PCII Program is responsible for ensuring compliance with the Regulation's uniform procedures for the handling, use, dissemination, and safeguarding of PCII. In this capacity, the PCII Program oversees a community of stakeholders, including submitters of Critical Infrastructure Information, authorized users of PCII and accredited Federal, state and local entities with homeland security duties. The PCII Program is required by its authorizing regulation to assist the Officers in overseeing their own accredited PCII programs at the state and local level. *See* 6 CFR 29.4(d). This questionnaire is designed to gather information from PCII Officers that can be used to assess their programs, their compliance with PCII rules and requirements, and the specific needs of their accredited programs. This will help the DHS PCII Program to ensure that PCII is being properly protected and avoid any improper disclosures, which would severely harm the Program, given PCII's voluntary nature.

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 collected in this questionnaire will be used by the PCII Program to assess accredited programs, their compliance with PCII rules and requirements, and to ensure that PCII is being properly protected, so as to avoid any improper disclosures. The data collected is for internal PCII Program and IP use only. The PCII Program will use the results of the PCII Officer Self-Assessment Questionnaire to determine any issues or gaps in compliance with PCII requirements and to identify areas that require additional communication or more in-depth review.

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 questionnaire will be administered via e-mail to reduce the respondent burden of responding to a paper survey or a telephone interview. The staff burden of manually administering a questionnaire and accurately collecting data is also reduced. Providing the questionnaire also captures participants typed comments, eliminating time-consuming transcription and manual inaccuracies. The questionnaire will be e-mailed via the PCII Management System and respondents will submit their completed questionnaires to pcii-info@dhs.gov, the Program's normal inbox for questions and issues.

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 currently collected in any form, and therefore is not duplicated elsewhere. Another survey used for the PCII Program covers PCII Training. The OMB Control No. for that collection is 1670-0012. A survey under review right now would cover broader aspects of program satisfaction among all categories of PCII stakeholders, but would not delve into aspects of program compliance as this questionnaire will.

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.

This information collection does not have an impact on small businesses or other small entities.

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

Without collecting the information as requested, the PCII Program would be unable to perform its mission as laid out in the PCII rule and would be unable to perform internal oversight to ensure that information is being properly protected.

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

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

There are no special circumstances causing information to be collected in this manner.

8. Federal Register Notice:
a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.
b. 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.
c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

	Date of Publication	Volume Number	Number	Page Number	Comments Addressed
60-Day Federal Register Notice:	November 16, 2012	77	222	68795-68796	No comments received
30-Day Federal Register Notice	May 20, 2013	78	97	29375-29376	No comments 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 PCII Officer Self-Assessment Questionnaire does not collect personally identifiable information. Data collected is for internal PCII Program and IP use only. This collection does not require a Privacy Impact Analysis or System of Records Notice.

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

There are no questions of a sensitive nature.

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.
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.

Table A.12: Estimated Annualized Burden Hours and Costs

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
PCII Officer	PCII Officer Self-Assessment Questionnaire	80	1	1	80	$47.64	$3,811.20
Total		80	1	1.	80	$47.64	$3,811.20

The average hourly wage reflects varied skill sets including homeland security professionals, submitters of CII, and first responders who would reasonably be expected to be PCII Officers. The $47.64/hr hourly wage rate for PCII Officers is based on series 11-9199 State government managers-other. All hourly wages are from Bureau of Labor Statistics Wage Data as of May 2009 (http://www.bls.gov/bls/wages.htm).

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The only cost to the Federal Government will be the salary of the Federal and contract/support staff that design, administer and review this material. The level of staff that design, administer, and analyze the collected materials may vary from a GS-11 to a GS-13 salary. The average hourly wage for GS-11/GS-12/GS-13 personnel from GS Salary tables for 2010 Washington, D.C. area locality pay is $41.58. Estimates are that it will take 100 hours to design and administer the PCII Stakeholder Survey and 100 hours to review, analyze and create a comprehensive quantitative and qualitative report.

Cost Category	Form Name	Hours for Design/ Administration	Hours per Report	Number of Reports	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
GS 11/12/13 personnel	PCII Officer Self-Assessment Questionnaire	100	100	1	200	$41.58	$8,316
Total		100	100	1	200	$41.58	$8,316

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

This is a new information request.

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 PCII program will not publish the questionnaire results and they are for internal use only. All survey reporting is internal to the PCII Program and IP.

Administration of the questionnaire will take approximately six to eight weeks. Internal reporting will occur approximately 30 days after the start of analysis.

Activity	Timeframe
Identify Survey Population	15 days from OMB approval
Administer survey to selected population	20 days from OMB approval
Analyze results	90 days from OMB approval
Internal survey reporting	120 days from OMB approval

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

The PCII Program 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 Submissions," of OMB Form 83-I.

The PCII Program does not request an exception to the certification of this information collection.