

Narrative of Changes from Withdrawn CFATS Personnel Surety Program Information Collection Request

Collection Title: CFATS Personnel Surety Program
OMB Control No.: 1670-NEW
Collection Instrument(s): Background Check to Identify Affected Individuals With Terrorist Ties

In June of 2011, the Department submitted an Information Collection Request about the CFATS Personnel Surety Program to OMB.

See http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201105-1670-002. In July of 2012, the Department withdrew the CFATS Personnel Surety Program ICR because the Department's thinking about the CFATS Personnel Surety Program had evolved since the ICR was initially submitted to OMB.

When compared to the Department's last public burden estimates in the June 2011 ICR, the new ICR incorporates several changes. Many of the changes address issues raised by stakeholders during the period of dialogue after the ICR was withdrawn by the Department in July of 2012 but before the publication of the 60-day notice in March of 2013. The changes are:

- Addition of Option 3 (electronic verification and validation of an affected individual's TWIC)
- Limitation to Tier 1 and Tier 2
- Reduction in the number of high-risk chemical facilities to align with current facility estimates rather than continued reliance on outdated expert opinion
- Change in the distribution of the 16 model facility types to align with actual data rather than continued reliance on outdated expert opinion
- Inclusion of a specific burden estimate related to unescorted visitors
- Addition of a capital cost estimate due to Option 3
- A commitment to provide certain users of the CSAT Personnel Surety application the ability to submit records of affected individuals via a web service
- The inclusion of several illustrative examples about how high risk chemical facilities or designees are likely to consolidate RBPS 12(iv) processing, while performing routine background check activities related to those required by RBPS 12(i)-(iii)
- Discussion about individuals that will require access to restricted areas or critical assets without visitor escorts or without the background checks listed in RBPS 12 under exceptional circumstances
- Discussion of alternatives considered but ultimately not selected by the Department

The burden estimate in this ICR, when compared to the June 2011 ICR burden estimate:

- Decreases the estimated number of respondents whose information will be submitted annually to the Department from 1,303,700 to 195,000; and
- Decreases the estimated total annual cost to the public from \$29,704,000 to \$4,844,000.