Supporting Statement for Paperwork Reduction Act Submissions

Title:

OMB Control Number: 1670-0009

Infrastructure Assessments and Training

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 Homeland Security Presidential Directive-7 (HSPD-7) (2003), Presidential Policy Directive-21 (PPD-21) (2013) and the National Infrastructure Protection Plan (NIPP) (2013) (Public Law 107-296) highlight the need for a centrally managed repository of infrastructure attributes capable of assessing risks and facilitating data sharing. To support this mission need, the Department of Homeland Security's (DHS) National Protection and Programs Directorate (NPPD) Office of Infrastructure Protection (IP) is developing the IP Gateway. The IP Gateway contains several capabilities which support the homeland security mission in the area of critical infrastructure (CI) protection.

The purpose of this collection is to gather the details pertaining to the users of the IP Gateway for the purpose of creating accounts to access the IP Gateway. This information is also used to verify a need to know to access the IP Gateway and to verify that all training is performed as necessary for the IP Gateway. In addition, this collection will gather feedback from the users of the IP Gateway to determine any future requirements to be gathered.

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.

This information collection was formerly named Chemical Sector Awareness Training Program. IP has made improvements to include the collection of customer feedback, system registration, and the training registration.

The information gathered will be used by the IP Gateway Program Management Team to assess the current functionality of the IP Gateway as well as identify any further capabilities to be developed. Through this process the IP Gateway will remain a viable solution for the stakeholders.

Due to the ever-evolving nature of the IP Gateway, it is necessary to continually assess the functionality and capabilities of the IP Gateway for future development. This necessitates an ongoing requirements gathering process. The survey to users (whom are identified stakeholders for the IP Gateway) is an ideal way to consolidate feedback and gather un-developed capabilities that would aid in the expansion and functionality of the IP Gateway. This survey would save in cost, time and labor to the Federal Government by facilitating a more efficient requirements gathering process as well as to determine the end users satisfaction with the current capabilities of the IP Gateway.

Below is a list of identified stakeholders for the IP Gateway.

1. Critical Infrastructure Community
2. Protective Security Advisors (PSAs)
3. State Fusion Centers
4. The State, Local, Tribal, and Territorial Governing Coordinating Council (SLTTGCC)
5. State representatives for critical infrastructure
6. Facility owner/operators
7. DHS Components and Sub-components to include:
    a. National Protection and Programs Directorate (NPPD)
    b. Federal Protective Service (FPS)
    c. Cyber Security and Communications (CS&C)
    d. Office of Infrastructure Protection (IP)
        i. Infrastructure Information Collection Division (IICD)
        ii. Sector Outreach and Programs Division (SOPD)
        iii. Protective Security Coordination Division (PSCD)
        iv. National Infrastructure Coordinating Center (NICC)
    e. Transportation Security Administration (TSA)
    f. Office of Health Affairs (OHA)
    g. Sector-Specific Agencies (SSAs)
8. Critical Infrastructure Sectors:
    a. Chemical Sector
    b. Commercial Facilities Sector
    c. Communications Sector
    d. Critical Manufacturing Sector
    e. Dams Sector
    f. Defense Industrial Base Sector
    g. Emergency Services Sector
    h. Energy Sector
    i. Financial Services Sector
    j. Food and Agriculture Sector
    k. Government Facilities Sector
    l. Healthcare and Public Health Sector
    m. Information Technology Sector
    n. Nuclear Reactors, Materials, and Waste Sector
    o. Transportation Systems Sector
    p. Water and Wastewater Systems Sector

9. Chemical Sector Coordinating Council (CSCC) (Members made up from the below associations):
    a. Agricultural Retailers Association (ARA)
    b. American Chemistry Council (ACC)
    c. Chemical Producers and Distributors Association (CPDA)
    d. The Chlorine Institute
    e. Compressed Gas Association (CGA)
    f. CropLife America (CLA)
    g. The Fertilizer Institute (TFI)
    h. International Liquid Terminals Association (ILTA)
    i. Institute of Makers of Explosives (IME)
    j. International Institute of Ammonia Refrigeration (IIAR)
    k. National Association of Chemical Distributors (NACD)
    l. American Coatings Association (ACA)
    m. American Fuel and Petroleum Manufacturers (AFPM)
    n. Society of Chemical Manufacturers and Affiliates (SOCMA)
    o. American Petroleum Institute (API)
10. Army Corp of Engineers

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 collection of information uses automated electronic forms. During the on-line registration process, there is a form to create an account requiring an estimated five minutes or less. The survey is electronic in nature and includes questions that measure the satisfaction of the user as well as a section to capture any improvements that the user would like to see added and/or corrected. It is a voluntary to take the survey and has a link displayed at the bottom of the screen labeled “Provide Feedback”. By clicking on this link, the user is then provided the electronic form for them to complete and submit.

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.

Currently there are no known similar programs or information collections that collect CI facility information pertaining to security and resiliency.

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.

The program and survey do not impact small business 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.

By not collecting this information, the IP Gateway Program could be impacted in its requirements gathering and identification for future development of capabilities to satisfy end users. If the information is not collected automatically during registration and the training process, a much more costly and cumbersome method to distribute the training program would be required. These could include production and distribution of software on CDs with printed instructions, with administrative controls on distribution, and filing of periodic reports by large and small businesses. If such information as the location, type of facility and number of employees is not electronically collected at the time of registration for the training, DHS will be unable to judge the success of distribution, awareness and adoption of the training program. There are no federal/DHS policy issues that would be affected at this time.

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 identified special circumstances at this time that would affect this program or survey.

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 #	Page #	Comments Addressed
60Day Federal Register Notice:	09/22/2015	80	183	57200-57201	0
30-Day Federal Register Notice	02/08/2016	81	25	6530-6531	0

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.

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

The IP Gateway contains a "Privacy Notice" issued by DHS Privacy Office after having gone through a Privacy Threshold Analysis (PTA) and a Privacy Impact Assessment (PIA). These documents are published by DHS Privacy Office and the system must go through reviews with NPPD Privacy on a quarterly basis so that the system continues to comply with all federal guidelines concerning Personally Identifiable Information (PII). There is no assurance of confidentiality. All user information and surveys are for internal use only and are not published to the public.

The collection is covered by the Privacy Impact Assessment (DHS/NPPD/PIA-022) currently under revision; and the System Of Records Notice, DHS/ALL-004 – General Information Technology Access Account Records System (GITAARS), dated November 27, 2012, 77 FR 70792.

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.

The survey does not contain any questions that are sensitive in 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.

The IP Gateway was designed and built to fill the lack of a repository for the Nation's critical infrastructure (CI) community. Examples of users of the CI community include federal, state, and county representatives as well as emergency response personnel, facility owners, and security personnel. To determine the approximate burden, the program performed an internal pilot program to government employees.

The frequency of response is the duration of completion of the registration page information, which requires a maximum of five minutes. Information is automatically collected during the registration and training sessions. Trainees may suspend training before completion, and may later return and log-on to the program to continue training, in as many sessions as suits their individual situation. Therefore, collection of data could take place over several sessions, or could be completed in only one session. Most trainees are expected to complete training in one session. Based on present user use, completion of training is estimated to take an average of 30 minutes (.5 hours).

Using the job category of Emergency Management (job category 11-9161) found at https://www.bls.gov/oes/2015/may/oes_nat.htm, the mean hourly base wage rate is $35.46 or a fully loaded wage rate of $49.64 ($35.46 x 1.4).

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	0	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
State, Local, Tribal, Territorial Government, & Con-	IPG Customer Satisfaction Survey	1000	1	.5 (30 Mins)	500	$49.64	$24,820.00

tractors							
State, Local, Tribal, Territorial Government, & Contractors	IP Gateway Registration	500	1	.5 (30 Mins)	250	$49.64	$12,410.00
Total		1500	1	.5	750	$49.64	$37,230.00

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 is no initial investment to begin surveying users and as it is an automated storage system, there are no identified record keepers.

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.

Using an estimated average federal employee cost of $79,720 per year for a GS 12, Step 1 (Divided by 2080 hours to equal $38.33 base wage rate or a fully loaded wage rate of $53.66), the estimated annualized cost to the Federal Government for processing and reviewing the surveys is 0.5 hours times 1,500 surveys or 750 hours annually, plus one-time expenditure of 1260 hours to design and administration the survey to equal a total of 2,010 hours. Therefore, the government cost is 2,010 hours x $53.66 = $107,856.60.

	Form Name	Hours for Design/ Adminis-tration	Hours per Report	Number of Reports	Total Annual Burden (in hours)	Aver-age Hourly Wage Rate	Total Annual Cost
	Registra-tions and Assess-ments	1260	.5	1500	750	$53.66	$107,856.60
Total		1260	.5	1500	750	$53.66	$107,856.60

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 essentially a new collection. The collection is within the scope of Infrastructure Training and was reinstated to reuse the OMB Control Number (1670-0009).

The changes to the collection include:

1. The title of the collection was updated to reflect the changes to the collection.
    a. Previous Title: Chemical Security Awareness Training Program
    b. Current Title: Infrastructure Assessments and Training
2. The burden has decreased due to the restructuring of the program.
    a. Net change in burden hours: -399,250 hours
3. The registration form and feedback survey have been re-designed, and the previously approved registration form and survey are no longer in use.

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 not be published or used outside of the Program. The information gathered is for internal use only and for identification of requirements.

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 program will display the expiration date for the OMB approval.

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

The program is not requesting an exception.