

Supporting Statement for Paperwork Reduction Act Submissions

Title:

OMB Control Number: 1670-0015

Chemical-terrorism Vulnerability Information 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.

On December 18, 2014, the President signed into law the *Protecting and Securing Chemical Facilities from Terrorist Attacks Act of 2014* (CFATS Act of 2014) (Pub. L. 113-254), which amended the Homeland Security Act of 2002 (Pub. L. 107-296) to reauthorize the Chemical Facility Anti-Terrorism Standards (CFATS) Program and add new provisions, while preserving most of the existing CFATS regulations. The CFATS Act of 2014 provides long-term authorization for the CFATS Program and codified the Department's authority to implement the CFATS Program into the Homeland Security Act of 2002. See 6 U.S.C. § 621 et. seq.

Section 550 of Public Law 109-295 previously provided (and the CFATS Act of 2014 continues to provide) the Department with the authority to identify and regulate the security of high-risk chemical facilities using a risk-based approach. See 72 FR 17688. Section 550 required (and the CFATS Act of 2014 continues to require) that the Department establish risk-based performance standards (RBPS) for high-risk chemical facilities and, under CFATS, the Department promulgated 18 RBPS.

CFATS, 6 CFR Part 27, is the Department's regulation governing security at high-risk chemical facilities. CFATS represents a national-level effort to minimize terrorism risk to such facilities. Its design and implementation balance maintaining economic vitality with securing facilities and their surrounding communities. The regulation was designed to take advantage of protective measures already in place and to allow facilities to employ a wide range of tailored measures to satisfy the regulation's 18 RBPS.

CFATS also establishes, in 6 CFR § 27.400, the requirements that covered persons must follow to safeguard certain documents and other information developed under the regulations from unauthorized disclosure. This information is identified as Chemical-terrorism Vulnerability Information (CVI) and by law receives protection from public disclosure and misuse¹. The statute and regulation authorizing the collection described in this Information Collection Request (ICR) can be viewed at the following websites:

- (1) The *Protecting and Securing Chemical Facilities from Terrorist Attacks Act of 2014*: <http://uscode.house.gov/view.xhtml?path=/prelim@title6/chapter1/subchapter16&edition=prelim>; and
- (2) 6 CFR Part 27, CFATS implementing regulations: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title06/6cfr27_main_02.tpl.

History of the Currently Approved Information Collection

In January 2010, the Department submitted an ICR to OMB for six instruments. This request was approved by OMB on March 2010 and the collection was set to expire on September 30, 2014.

In March 2013, the Department submitted an ICR extension to OMB, without change, for the same six instruments. This request was also approved by OMB on September 13, 2014 and the collection expiration was extended until September 30, 2017.

Presently, the Department requests that OMB extend this information collection for an additional three years, with revisions, to modify the burden of one instrument (CVI Authorization). In addition and based upon the results of a recent reevaluation of each instrument, the Department proposes to remove the remaining five instruments that are currently authorized under this collection. This proposal is based upon a review of the historical use of each instrument and a determination by the Department that it has no need to continue to routinely collect information under these instruments.

Reasons for Revisions

The Department requests that OMB extend this information collection with the following revisions:

- A reduction of the overall total annual operating cost to the Federal Government for this collection from \$731,800 to \$492,927 based on the projected costs for Government Full-time Equivalent (FTE) salaries that is reflected in the Office of Personnel Management's (OPM) 2017 General Schedule Locality Pay Table.
- Removal of the following instruments: (1) Determination of CVI; (2) Determination of a "Need to Know" by a Public Official; (3) Disclosure of CVI Information; (4) Notification of Emergency or Exigent Circumstances; and (5) Tracking Log for CVI Received from this collection. As required by 5 CFR § 1320.5, the Department reevaluated the continued need for each instrument in this collection. This evaluation resulted in a finding that, historically, these instruments have been used rarely. In addition, the Department expects that in many instances when the Department may need or want to collect information regarding emergency and/or unauthorized disclosure of CVI, the collection would not be covered by the Paperwork Reduction Act (PRA) because the information would be collected during the conduct of an investigation involving specific individuals or entities. See 44 U.S.C. 3518(c)(2) and 5 CFR 1320.4(a). Finally, the Department now encourages state and local officials to request information regarding chemical facilities in their jurisdictions from the Department rather than from the facilities. Accordingly, these

officials now are directed to IP Gateway². The information that must be collected routinely for such officials to gain access to IP Gateway has been authorized under OMB Control No. 1670-0009. Based on the foregoing reasons, in the future the Department does not anticipate a routine need to collect this information through these five instruments.

- The Department realizes that the associated hourly salary from the spectrum of possible CVI Authorized Users accessing the CVI Authorization instrument is potentially wide. Consequently, the Department is making the assumption that the hourly salary of Site Security Officers (SSOs) should be used to provide a mean hourly salary associated with this collection. This request incorporates a reduction of the annual reporting and recordkeeping hour and cost burden for SSOs using a wage rate of **\$78.93 /hour** which is based on updated Bureau of Labor Statistics (BLS) data.
- A reduction of the number of respondents for the CVI Authorization instrument from 30,000 to 20,000. The average number of respondents between CY 2014 – 2016 is 13,115 and the historical peak annual usage of the instrument (in 2008) was 18,727. However, the Department expects that annual usage in the next three years to increase from the CY 2014 - 2016 average. This assessment is based on new users who must become CVI Authorized Users and who are required to submit Top-Screens following the Department's revision of its Chemical Security Assessment Tool (CSAT), currently approved under 1670-0007, and enhancement of its risk-tiering methodology. See 81 FR 47001 (Jul. 20, 2016). For these reasons, the Department has revised the estimated number of respondents to 20,000.
- A reduction of the response time for the CVI Authorization instrument from 1 hour to 0.50 hours (30 minutes). This is based upon data collected between CY 2014-16 by the CSAT system measuring the time spent by users completing this instrument indicating that the average response time was 0.50 hours (30 minutes).

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.

Only one instrument is in this collection and this instrument will be used to manage the CVI Program in support of CFATS. All information collected supports the Department's effort to reduce the risk of a successful terrorist attack against high-risk chemical facilities. This collection directly and indirectly supports the affected chemical facilities' requirements to submit data under the CFATS Act of 2014 and CFATS, 6 CFR Part 27.

² https://ipgateway.dhs.gov/dana-na/auth/url_28/welcome.cgi

Only one instruments is in this collection:

1. CVI Authorization.

Chemical-terrorism Vulnerability Information (CVI) Authorization

CVI is a Sensitive but Unclassified designation authorized under 6 U.S.C. 623 and implemented in 6 CFR § 27.400. Providing CVI training is essential to protect the sensitive data developed and/or submitted to the Department pursuant to the CFATS regulation.

Pursuant to 6 CFR 27.400(e)(3), the Department may “make an individual’s access to CVI contingent upon...procedures and requirements for safeguarding CVI that are satisfactory to the Department.” Using this authority the Department requires individuals to undergo CVI training before granting the individual Authorized User status.³ Specifically, the Department trains individuals on the appropriate maintenance, safeguarding, marking, disclosure, and destruction of CVI. The primary audiences for the training are (1) individuals employed or contracted by chemical facilities, and (2) Federal, State, local employees and contractors.

To obtain CVI Authorized User status, an individual must check several CVI affirmation statements, complete a web-based CVI authorized user application, and provide responses to several identity verification questions. Upon completion of the application, the system assigns a unique CVI Authorization Number to the individual and transmits that number to the Department. The Department maintains a record of those individuals who have completed the training and received a CVI Authorized User Number.

The information is collected electronically (CVI Authorized User Training employing CSAT) by this instrument.

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.

Consideration of the Use of Improved Information Technology

Although most, but not all, of the instruments allow for the collection of data in multiple mediums, DHS intends to reduce the overall paperwork burden associated with this collection through the use of web-enabled interfaces as the primary data collection process.

³ Authorization for access to CVI does not constitute “need to know.” The concept for need to know is addressed in the CVI Training and is based upon 6 CFR 27.400(e).

Table 1: Medium Information Collected

Name of Instrument	Medium Collection
CVI Authorization	The information is collected electronically, by this instrument, via CSAT.

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.

CVI is a unique information protection and handling program originally authorized by Congress in Section 550(c) of Pub. Law 109-295 and currently authorized under 6 U.S.C. § 623. As a unique program it does not duplicate any current collection activities.

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.

No unique methods will be used to minimize the burden to small businesses.

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.

The frequency of collection is dictated by regulation, specifically 6 CFR 27.400. Reporting less frequently will substantially reduce the ability of the CVI Program to ensure the smooth handling and safeguarding of CVI. CVI is essential to implementing and regulating the CFATS, 6 CFR Part 27. Improper handling or disclosure of CVI could release sensitive information to individuals and groups seeking information that would increase the risk of a successful terrorist attack on a high-risk chemical facility.

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.

No special circumstances are involved with this collection.

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
60-Day Federal Register Notice:	April 19, 2017	82	74	18466	1
30-Day Federal Register Notice	July 27, 2017	82	143	34969-34970	0

A 60-day public notice for comments was published in the *Federal Register* on April 19, 2017. The Department received 1 comments submitted by 1 commenters, which may be found on www.regulations.gov under Docket ID DHS-2017-0015. The Department's responses were included in a PRA 30-day *Federal Register* notice and are below:

Comment: The one comment received concerning the 60-day PRA notice for this proposed information collection raised a concern that guidance provided in the DHS "Safeguarding Information Designated as Chemical-Terrorism Vulnerability Information (CVI)" manual ("CVI Procedural Manual") and the CFATS regulation (at 6 C.F.R. § 27.400(d)(7)) appear to require collection of information using three instruments identified by DHS for removal. The Commenter also asserted that the investigatory exception under 44 U.S.C. 3518(c) does not justify the Department's collection of information as part of these three instruments without an OMB-approved information collection request. Based on these reasons, the comment suggested retaining the "Disclosure of CVI Information," "Notification of Emergency or Exigent

Circumstances,” and “Tracking Log for CVI Received” instruments in this information collection with adjusted burden levels.

Response: The Department’s proposal to remove five instruments from this collection, including the three identified by the commenter, is based mainly on an evaluation of the historical usage of those instruments. As noted in DHS’s 60-day notice, “these instruments have historically been used rarely.” 82 FR 18467. More specifically, DHS’s review indicated that at no time has the Department collected information under any of these five instruments on ten or more occasions during any given calendar year. Additionally, the Department expects that this historical pattern would continue during the next three years if the instruments were to be retained. Consequently, none of the instruments proposed for removal qualify as a “collection of information” subject to the requirements of the Paperwork Reduction Act (see 44 U.S.C. § 3502 (3)(A)(i)). Also, if this proposed information collection is approved, DHS would only collect the information currently covered by the three instruments identified by the commenter as part of an administrative action or investigation, which would exempt these instruments from the requirements of the Paperwork Reduction Act (if they were not also exempt for other reasons).

In addition, removal of the five instruments proposed is consistent with DHS guidance provided in the DHS CVI Procedural Manual and the requirements specified in 6 CFR § 27.400. Per the specific marking on the footer of each page, the DHS CVI Procedural Manual “does not create or confer any new rights or obligations on any person or entity or otherwise operate to bind the public.” Rather, the DHS CVI Procedural Manual describes and encourages the public’s use of best practices for complying with the regulatory requirements associated with maintaining, safeguarding, and disclosing CVI set out in 6 CFR § 27.400. DHS developed some of the instruments in this collection as part of these best practices, but their use is not mandatory. If this proposed collection is approved, the Department will consider updating its guidance materials to clarify this aspect of the CVI Program.

To the extent that reporting certain information to the Department is required by 6 CFR 27.400(d)(7), that reporting requirement will remain in effect. However, as described in the paragraph above detailing historical usage of the instruments proposed for removal from this collection, DHS expects to receive fewer than ten such reports per year and the Department would likely seek unique pieces of information related to each unauthorized release of CVI, not standard pieces of information.

A 30-day public notice for comments was published in the *Federal Register* on July 27th, 2017 at 82 FR 34969. The Department received 0 comments.

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

No payment or gift of any kind is provided to any respondents.

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

No assurance of confidentiality is provided to the respondents. However, some information may be protected from disclosure by the Department under the designation CVI. CVI is a Sensitive but Unclassified designation authorized under Pub. Law 107-296 and implemented in 6 CFR 27.400.

6 U.S.C. 623(d) states that “in any proceeding to enforce this section, vulnerability assessments, site security plans, and other information submitted to or obtained by the Secretary under this section, and related vulnerability or security information, shall be treated as if the information were classified material.” In addition, 6 CFR § 27.400(h) specifies the circumstances under which access to CIV may be provided by the Department in the context of an administrative enforcement proceeding.

This is a privacy sensitive system. A Privacy Threshold Analysis has been adjudicated by the DHS Privacy Office which resulted in a determination that PIA coverage is provided by DHS/NPPD/PIA-009(a) Chemical Facility Anti-Terrorism Standards August 12, 2016. SORN coverage is provided by DHS/ALL-002-Department of Homeland Security (DHS) Mailing and Other Lists System, November 25, 2008, 73 FR 71659, DHS/ALL-004-General Information Technology Access Account Records System (GITAARS), November 27, 2012, 77 FR 70792.

Notwithstanding the Freedom of Information Act (FOIA) (5 U.S.C. 552), the Privacy Act (5 U.S.C. 552a), and other laws in accordance with 6 U.S.C. 623(c) and 6 CFR § 27.400(g), records containing CVI are not available for public inspection or copying, nor does the Department release such records to persons without a need to know. *See* 6 CFR 27.400(g)(1).

If a record contains both CVI and non-CVI information, the latter information may be disclosed in response to a FOIA request, provided that the record is not otherwise exempt from disclosure under FOIA and that it is practical to redact the protected CVI from the requested record. *See* 6 CFR 27.400(g)(2).

DHS’s primary IT design requirement is ensuring data security. DHS acknowledges that a non-zero risk exists, both to the original transmission and the receiving transmission, when requesting data over the Internet. DHS has weighed the risk to the data collection approach against the risk to collecting the data through paper submissions and concluded that the web-based approach was the best approach given the risk and benefits.

DHS has taken a number of steps to protect both the data that will be collected through the CSAT Program and the process of collection. The security of the data has been the number one priority of the system design. The site that the Department uses to collect submissions is equipped with hardware encryption that requires Transport Layer Security (TLS), as mandated

by the latest Federal Information Processing Standard (FIPS). The encryption devices have full Common Criteria Evaluation and Validation Scheme (CCEVS) certifications. CCEVS is the implementation of the partnership between the National Security Agency and the National Institute of Standards (NIST) to certify security hardware and software.

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 instrument described in this collection does not request any information of a personally 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.

The Department assumes that the majority of individuals who will complete this instrument are SSOs, although a smaller number of other individuals may also complete this instrument (e.g., Federal, State, and local government employees and contractors). For the purpose of this notice, the Department maintains this assumption. Therefore, to estimate the total annual burden, the Department multiplied the annual burden of 10,000 hours by the average hourly wage rate of SSOs of \$78.93 per hour. The SSOs' average hourly wage rate of \$78.93 was based on an average hourly wage rate of \$53.92⁴ with a benefits multiplier of 1.4639⁵.

The individual burden estimate is summarized in the table below:

⁴ The wage used for an SSO equals that of Managers, All (11-9199), with a load factor of 1.4639 to account for benefits in addition to wages <https://www.bls.gov/oes/2016/may/oes119199.htm>

⁵ Load factor based on BLS Employer Cost for Employee Compensation, as of June 9, 2017. Load factor = Employer cost for employee compensation (\$35.28) / wages and salaries (\$24.10) = 1.4639 <https://www.bls.gov/news.release/ecec.nr0.htm>

Table 2: Instrument Burden Estimate

Instrument	# of Respondents	Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Total Annual Burden (in dollars)
	(a)	(b)	(c)	(d) = (a) x (b) x (c)	(e) = (d) x \$78.93
CVI Authorization	20,000	1	0.50	10,000	789,335
Total	20,000			10,000	789,335

Accordingly, the annual total estimate for reporting, recordkeeping, and cost burden, under this collection, is \$789,335.

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.

The Department provides access to CSAT free of charge and assumes that each respondent already has computer hardware and access to the internet for basic business needs. No other annualized capital or start-up costs are incurred by chemical facilities of interest or high-risk chemical facilities for 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.

Federal Government costs can be divided between the cost associated with collection of information and the cost associated with managing and responding to the submitted data. The cost associated with collecting the information is essentially the cost of operating and maintaining the collection instruments within CSAT. The annual Operating and Maintenance (O&M) costs for the instruments with CSAT are estimated at \$0.4M. In addition, the costs of Government FTE have decreased from two GS-14 FTE Program Managers to ½ GS-14, Step 5 FTE Program Manager due to a reassessment of manpower requirements in support of the CVI Program. . The costs from the Government FTE have decreased due to a reassessment of manpower requirements in support of the CVI Program. The cost associated with managing and responding to the submitted data is the management equivalent to the cost of employing a ½ FTE at the GS-14, Step 5 level. These FTE costs are the fully-loaded cost associated with salary costs with a 1.4639 benefits multiplier. The fully-loaded wage rate for a GS-14, Step 5 FTE is \$126,958 base salary x 1.4639 benefit multiplier is \$185,854.

Table 3: Estimates of Annualized Costs for the Collection of Data

Expense Type	Expense Explanation	Annual Costs (in dollars)
Direct Costs to the Federal Government	1/2 FTE (GS-14, Step 5) @ \$185,854/year (Washington-Baltimore-Arlington, DC-MD-VA-WV-PA 2017 Pay Scale)	\$92,927
CSAT O&M	Costs for O&M of CSAT Application	\$400,000*

* Note: The Department entered into an Interagency Agreement (IA) with the Department of Energy, Oak Ridge National Laboratory, to operate and maintain O&M of the CSAT system. Because the O&M costs associated with each subsystem in CSAT are not costed separately in the IA, it isn't possible to isolate the proportion of O&M costs associated with this collection. Therefore, the actual total annual operating cost to the Federal Government are likely lower than estimated.

Total \$492,927

In sum, the estimated total annual operating cost to the U.S. Government for this collection is \$492,927.

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.

The Department is assuming that a significant change in public burden estimates have occurred since the last approved ICR (Sept 2014).

For the CVI Authorization instrument the Department assumes that the majority of individuals who will complete this instrument are SSOs, although a smaller number of other individuals may also complete this instrument (e.g., state officials or Federal employees). For the purpose of this notice, the Department maintains this assumption. The Department is also incorporating reduction of the annual reporting and recordkeeping hour and cost burden for SSOs to \$78.93/hour, based on the fully loaded wage rate for Managers, All Other as provided by BLS and described in Q12.

For the CVI Authorization instrument the Department has revised the estimated number of respondents from 30,000 to 20,000 to reflect the Department's revised estimate on expected annual usage of this instrument. In addition, a reduction of user response times for the CVI Authorization instrument was observed to decrease from 1 hour to 0.50 hour. The average user response time between CY 2014 – 2016 was observed to be 0.50 hour. In addition, the estimated total burden is estimated to decrease by -385,100 responses, -53,775 burden hours, and \$4,695,315 based on the proposed elimination of five instruments previously approved for the collection CVI-related information and the reduction of the response time for CVI Authorization.

Taking into consideration all of these changes, the total annual estimate for reporting, recordkeeping, and cost burden under this collection is expected to decrease from \$5,484,650 to \$789,335; from 405,100 responses to 20,000 responses; and 63,775 hours to 10,000 hours.

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.

No plans exist for the use of statistical analysis or to publish this information.

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 expiration date will be displayed in the instruments.

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

No exceptions have been requested.