

Supporting Statement for Paperwork Reduction Act Submissions

Title: The Department of Homeland Security, Office of Compliance and Security, NPPD

Visitor Request Form

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.

Public Law 107-296 The Homeland Security Act of 2002, Title II, recognizes the Department of Homeland Security role in integrate relevant critical infrastructure and cybersecurity information, analyses, and vulnerability assessments (whether such information, analyses, or assessments are provided or produced by the Department or others) in order to identify priorities for protective and support measures by the Department, other agencies of the Federal Government, State and local government agencies and authorities, the private sector, and other entities while maintaining positive control of sensitive information regarding the national infrastructure. In support of this mission the National Protection and Programs Directorate Office of Compliance and Security must maintain a robust visitor screening capability.

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 Office of Compliance and Security will collect, using an electronic form, information about each potential visitor to NPPD facilities and the nature of each visit. The Office of Compliance and Security will use collected information to make a risk-based decision to allow visitor access to NPPD facilities.

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 Office of Compliance and Security will only use electronic submission via email of the collection information using an electronic fillable pdf form. This decision allows for the efficient collection of information about visits, with minimal cost to the government. The form is requested by NPPD employees or contractors to complete for non-DHS guests visiting NPPD facilities. The form is available via the internal DHS website or by requesting a copy of the form from the Office of Compliance and Security.

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.

The Office of Compliance and Security will utilize the same electronic method at all NPPD facilities. This form is unique to NPPD, so information does not exist from other sources.

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 collection should not impact small businesses. Use of electronic submission should assist in minimizing any impact.

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.

NPPD programs and office have statute requirements to coordinate with other government agencies and industry, ensuring a large volume of visits. If collection about visits is not conducted NPPD programs and offices will not be able to complete their mission, or will do so at an increased risk to government personnel, assets and information.

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.

- a. Respondents will complete a form for each visit
- b. Respondents are required to complete the form at least 24 hours before the meeting
- c. N/A
- d. N/A
- e. N/A
- f. N/A
- g. N/A
- h. N/A

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
<i>60Day Federal Register Notice:</i>	05/17/2017	82	94	22673 - 22674	0
<i>30-Day Federal Register Notice</i>	08/29/2017	82	166	41043 - 41044	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 collection.

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

There are no assurances of confidentiality.

The system of record notices associated with this information collection are:

- DHS/ALL-023 - Department of Homeland Security Personnel Security Management February 23, 2010, 75 FR 8088
- DHS/ALL-024 - Department of Homeland Security Facility and Perimeter Access Control and Visitor Management

The privacy impact assessments (PIAs) coverage will be provided by the forthcoming update to DHS/ALL/PIA-039 Physical Access Control System (PACS)

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.

It is estimated that it will take each participant 10 minutes to complete the Visitor Request form. For 20,000 respondents annually, the burden is 3333 hours. To estimate the cost of this collection, NPPD uses the mean hourly wage of “All Occupations” of \$23.86¹. NPPD then applies a load factor of 1.4639² to this average wage to obtain a fully loaded average hourly wage of \$34.93. The total respondent cost burden for this collection is \$116,429 (3,333 hours x \$34.93).

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name	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
Visitors	NPPD Visitor Request Form	20,000	1	0.16667	3,333	\$34.93	\$116,429
Total		20,000			3,333		\$116,429

Note: Totals may not sum due to rounding

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

¹ https://www.bls.gov/oes/2016/may/oes_nat.htm The selection of “All Occupations” was chosen as the expected respondents for this collection could be from any occupation.

² 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>

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.

Response...

There are no recordkeeping, 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.

Response...

Based on internal review, Office of Compliance and Security personnel estimate that it takes approximately 10 minutes per request to process each Visitor Request form for a GS-13 Step-5. The hourly basic rate for the Washington, DC locality was obtained according to General Schedule (GS) for the Washington DC area: <https://www.federalpay.org/gs/locality/washington-dc>. For a GS-13 Step-5, the annual wage is \$107,435, which we divide by 2,087 hours to obtain an hourly wage rate of \$51.48. The fully loaded wage rate using a 1.46389 multiplier is calculated as \$75.36.

For the GS-13 Step-5, with 20,000 respondents annually processing the Visitor Request form x 10 minutes for design and administration = 3333 hours.

GS-13 Step 5: 3,333 x \$75.36= \$251,197.

Total Cost to the Government = \$251,197.00

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-13, Step 10, or equivalent		0	0.16667	20,000	3,333	\$75.36	\$251,197
Total							\$251,197

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.

Response...

This is a collection in use without an OMB Control Number and is being brought into compliance with the Paperwork Reduction Act.

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.

Response...

The information will not be published, and is secured internally within the Office of Compliance and Security

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

Response...

The Office of Compliance and Security 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 Office of Compliance and Security does not request an exception to the certification of this information collection.