

Supporting Statement for Paperwork Reduction Act Submissions

Title: *Soft Target Countermeasure Survey*

OMB Control Number: 1670-NEW

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.

Title II of the Homeland Security Act of 2002 (Public Law 107-296), as amended (2006) directs the Department of Homeland Security (DHS) to coordinate all Federal homeland security activities, including infrastructure protection. On behalf of the Department of Homeland Security, the Cybersecurity and Infrastructure Security Agency (CISA) Infrastructure Security Division (ISD) manages the Department's program to protect and enhance the resilience of the Nation's physical and cyber infrastructure within the 16 critical infrastructure sectors designated by Presidential Policy Directive 21 *Critical Infrastructure Security and Resilience* (PPD-21) (February 2013) by implementing the *National Infrastructure Protection Plan (NIPP) 2013: Partnering for Critical Infrastructure Security and Resilience*.

Under PPD-21, each sector is assigned a Sector-Specific Agency (SSA) to oversee Federal interaction with the array of sector security partners, both public and private. SSAs are responsible for leading unified public-private sector efforts to develop, coordinate, and implement a comprehensive physical, human, and cybersecurity strategy for its assigned sector. CISA ISD executes the SSA responsibilities for these six critical infrastructure sectors: Chemical; Commercial Facilities; Critical Manufacturing; Dams; Emergency Services; and Nuclear Reactors, Materials and Waste, and coordinates with the partners across the remaining 10 sectors. CISA ISD conducts and facilitates vulnerability and consequence assessments to help critical infrastructure owners and operators and State, local, tribal, and territorial partners understand and address risks; provides information on emerging threats and hazards so that appropriate actions can be taken; and offers tools and training to partners to help them manage the risks to their assets, systems, and networks. CISA ISD accomplishes their mission by building sustainable partnerships with its public and private sector stakeholders to enable more effective sector coordination, information sharing, and program development and implementation. These partnerships are sustained through the Sector Partnership Model, described in the 2013 NIPP, pages 10-12.

The Homeland Security Act of 2002, as amended (2006), also granted DHS the authority to create university-based Centers of Excellence (COEs) using grants, cooperative agreements and contracts. The COEs are authorized by Congress and selected by the DHS Science and Technology Directorate (S&T) through a competitive selection process. Among the COEs is The National Center for Risk & Economic Analysis of Terrorism Events (CREATE) at The University

of Southern California. The Strategic Sourcing Program Office for DHS has approved the Basic Ordering Agreements (BOAs) for DHS-wide use. Any and all DHS components requiring the research, analysis, and/or services of the COEs described in the COE BOAs may issue Task Orders under the BOAs through their assigned warranted Contracting Officers.

CISA ISD has contracted a study through the approved BOA with CREATE to analyze a broad set of security measures used in the Commercial Facilities critical infrastructure sector in terms of their costs and spillover effects, with an emphasis on identifying security measures that had a positive effect. This includes examining a broad range of measures including increased police/security guard presence and other non- or less-invasive options. The study team will work with business leaders to identify locations that have implemented various security measures already, and develop and administer surveys for statistical analysis and modeling. To do so, the study team will survey the businesses' customers to evaluate the public's perceptions of the security measures, and evaluate the enhanced security measures on business operations and customers' responses.

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.

CREATE will work with CISA personnel to identify locations that have implemented various security measures already, and develop and administer surveys for statistical analysis and modeling. Management professionals (Chief Operating Officers, Head of Marketing, and Head of Security) from five selected businesses will be asked questions tailored to the five specific businesses regarding current and planned safety measures, management understanding of customer perceptions of security measures, management beliefs about the impacts of security measures, management beliefs about how security measures change customer behaviors and business volume, and some select demographic information. This will be conducted as a structured interview, herein referred to as "Business Structured Interview", and is needed to obtain necessary and relevant data for subsequent economic analyses. The purpose of these analyses is to evaluate whether specific counterterrorism efforts have a negative or positive impact on the company in question.

CREATE will administer a customer survey, herein referred to as "Customer Survey", regarding awareness of countermeasures in the Commercial Facilities sector, attitudes and perceptions toward safety, impacts (physical, psychological, and monetary) countermeasures have on customers, and select demographic and individual difference questions. There will be five variations of this survey targeted to each of the five specific businesses with slight variations in the language as a result, however the same information is being sought from the groups. These surveys are intended to create an understanding of the impacts of security countermeasures on customers/visitors' perceptions and behaviors at each of the specific target businesses selected.

Information will be analyzed to determine whether the spillover effects are positive and negative and to what extent. Statistical analysis of the results will identify the direct impacts. These will be fed into an economy-wide modeling approach known as computable general equilibrium (CGE) analysis to determine the "ripple" effects on the entire local economy. The analysis will

be performed with an eye toward uncertainty analysis, as well in terms of the framing of survey questions and, rigorously specifying the confidence intervals for the statistical results.

The DHS and CREATE research team will use the information being collected in order to inform the study described above.

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 Business Structured Interview will be conducted as interviews, either in-person or via video conferencing, which will have a list of questions to help structure and guide discussions.

The Customer Survey will be created and sent utilizing a professional-grade software, “Research Core,” by Qualtrics. The software allows the researchers to send customized email invitations to respondents, track their progress, and prevent fraud and abuse of the survey.

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.

A search of reginfo.gov revealed that this information is not collected in any form, and therefore is not duplicated elsewhere. This study will add to the countermeasures analyzed in a previous CREATE study (Rose, A., Avetisyan, M., & Chatterjee, S., A Framework for Analyzing the Economic Tradeoffs between Urban Commerce and Security; *Risk Analysis*, 34(5): 1554-79. [DHS] ; 2014), however the Contractor shall examine a broader range of measures including increased police/security guard presence and other non- or less-invasive options.

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.

DHS will not be able to assess whether security measures result in spillover effects across countermeasures, thus would not be able to share information throughout the public-private partnership for Commercial Facilities regarding the positive spillover effects of security measures. This would have a negative impact on the security and resilience of the Nation’s critical infrastructure and population that may be vulnerable to attacks on soft-target facilities.

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.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (c) Requiring respondents to submit more than an original and two copies of any document.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (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.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

- (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

(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.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

(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.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information 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
<i>60Day Federal Register Notice:</i>	June 19, 2018	83	118	28440	0
<i>30-Day Federal Register Notice</i>	November 19, 2018	83	223	58272	0

A 60-day Federal Register Notice inviting public comments was published on June 19, 2018, 83 FR 28440. No public comments were received.

A 30-day Federal Register Notice inviting public comments was published on November 19, 2018, 83 FR 58274. No public comments were 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.

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 provided for this information collection.

The collection is not privacy sensitive. No personally identifiable information (PII) is being collected; therefore, neither Privacy Impact Assessment (PIA) nor System of Records Notice (SORN) coverage is required.

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.

For this collection, we estimate that at each of the 5 venues that will issue surveys, 400 respondents will submit a survey response. CREATE estimates that the customer survey will take approximately 20 minutes to complete, for a total burden of 133.33 hours (400 surveys x .33 hours) per venue, or 666.66 hours total for all five venues.

To estimate the burden of this survey as a cost, we multiply the total burden hours by the fully loaded hourly wage for all workers, as this survey will be issued to all customers and not one

specific industry or employment type. We use an hourly wage of \$23.86¹ and multiply that by a factor of 1.465² to account for benefits to obtain a fully loaded hourly wage of \$34.95. This wage multiplied by the total hours provides a burden estimate of \$23,298.

Customer Survey

Customer Survey	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
Venue 1	400	1	0.33	133	\$34.95	\$4,659.63
Venue 2	400	1	0.33	133	\$34.95	\$4,659.63
Venue 3	400	1	0.33	133	\$34.95	\$4,659.63
Venue 4	400	1	0.33	133	\$34.95	\$4,659.63
Venue 5	400	1	0.33	133	\$34.95	\$4,659.63
Total	2000	1	0.33	667	\$34.95	\$23,298.17

This collection also includes a structured interview for businesses. For this burden we estimate that at each of the 5 venues that will submit 4 senior level officials for interviews. CREATE estimates that the structured interviews will take approximately 30 minutes to complete, for a total burden of 2 hours (4 interviews x .5 hours) per venue, or 10 hours total for all five venues.

To estimate the burden of this survey as a cost, we multiply the total burden hours by the fully loaded hourly wage for all workers, as this survey will be issued to all customers and not one specific industry or employment type. We use an hourly wage of \$56.74³ and multiply that by a factor of 1.465⁴ to account for benefits to obtain a fully loaded hourly wage of \$83.11. This wage multiplied by the total hours provides a burden estimate of \$831.

Business Structured Interviews

Business Structured Interviews	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
Venue 1	4	1	0.5	2	\$83.11	\$166.21
Venue 2	4	1	0.5	2	\$83.11	\$166.21
Venue 3	4	1	0.5	2	\$83.11	\$166.21
Venue 4	4	1	0.5	2	\$83.11	\$166.21

¹ This is the BLS salary for all occupations. https://www.bls.gov/oes/2016/may/oes_nat.htm#11-0000

² Load factor based on BLS Employer Cost for Employee Compensation, as of March 20, 2018. Load factor = Employer cost for employee compensation (\$35.87) / wages and salaries (\$24.49) = 1.464679 <https://www.bls.gov/news.release/ecec.nr0.htm>

³ This is the BLS salary for all management occupations. https://www.bls.gov/oes/2016/may/oes_nat.htm#11-0000

⁴ Load factor based on BLS Employer Cost for Employee Compensation, as of March 20, 2018. Load factor = Employer cost for employee compensation (\$35.87) / wages and salaries (\$24.49) = 1.464679 <https://www.bls.gov/news.release/ecec.nr0.htm>

Venue 5	4	1	0.5	2	\$83.11	\$166.21
Total	20	1	0.5	10		\$831.06

The combined burden to industry of the customer survey and the structured interviews would be 2020 (2000 + 20) responses, 677 (667 + 10) hours, and \$24,129 (\$23,298 + \$831) annual burden cost.

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.)

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.

This study is being conducted by CREATE at the request and under contract by CISA. As such, the cost to the Federal Government is equal to the cost of the contract, \$300,000 for a multi-phase process to select survey locations, create and conduct the survey, and analyze the results. The period of performance for this contract is one year, so the \$300,000 cost will be considered the annualized cost for this effort.

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 collection of information.

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.

Descriptive statistics will be calculated and reported for survey responses. We anticipate application of simple multivariate statistical methods to compare customer means across venues, and to

compare customer means to means from reference survey responses. Correlations among various response variables will also be calculated and reported. Measures of central tendency will be used to estimate parameters in economic modeling, described in the proposed research. There are no complex analytical techniques anticipated.

The CREATE study is intended to inform decisions about the implementation of soft target countermeasures by both the Department of Homeland Security and its critical infrastructure partners in the private sector and other parts of the federal government, along with partners in state, local, tribal, and territorial governments. In order to inform those decisions, the study’s final report—including aggregated statistics and summaries of those survey results that are subject to PRA—will need to be shared broadly with these partners and is anticipated to be released publicly. However, raw survey data will not be released.

Project Schedule	
Tasks	Time Frame
CREATE administer the customer and business survey	09/15/2018 – 10/15/2018
CREATE close survey response period and consolidate responses	10/15/2018
CREATE complete statistical analysis of survey data and prepare report of findings	10/15/2018 – 3/15/2019
CREATE present report of findings to CISA ISD	3/15/2019
Report publication dates	4/15/2019

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

DHS 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.

DHS does not request an exception to the certification of this information collection.