SUPPORTING STATEMENT
1110-0049 COLLECTION
INFRAGARD APPLICATION AND MEMBERSHIP PROFILE QUESTIONNAIRE

A. Justification.

1. <u>Necessity of Information Collection</u>

This collection, the member profile questionnaire, is authorized by 28 U.S.C. Sec. 533, which directs the Attorney General and its Justice Department entities, including the FBI, to detect and prosecute crimes against the United States.

For ongoing participation in InfraGard, members must complete the member profile questionnaire providing information that indicates respondents' skills and expertise to be used by FBI representatives to query the membership about topics of interest. This profile stores member information on business type and size, professional associations/certifications, and areas of expertise and interests. This information is necessary to categorize the respondents into groups based on their industry, expertise, knowledge and skills.

InfraGard is a Public/Private Alliance that operates 7 days a week, 24 hours a day (7 X 24) [with regular down time for maintenance] on-line (real-time), controlled-access communications and information sharing data repository that is owned by the Federal Bureau of Investigation (FBI) Office of Private Sector (OPS). The purpose of the InfraGard program is to share intelligence information between the FBI and the private sector about threats and infrastructure vulnerabilities. InfraGard is accessed by vetted and authorized entities using industry-standard personal computers equipped with any standard Internet browser who access a secure website, where members can communicate securely.

As part of its mission, the FBI conducts outreach and information sharing with the public and private-sector owners and operators of critical infrastructures. The InfraGard Program

establishes a mechanism for two-way information sharing about threats to the nation's critical infrastructure and provides a channel for the FBI to disseminate analytical threat products to the private sector. The InfraGard secure website was designed to provide InfraGard members information about intrusions and infrastructure protection measures, access to original research issues, and the capability for members to communicate with each other about similar security interests through secure channels. InfraGard also supports anti-terrorism, intelligence, law enforcement, criminal justice, and public safety communities nationwide.

The InfraGard system was developed in concert with the FBI and the Information Analysis and Infrastructure Protection Directorate (IAIP) of the Department of Homeland Security to address cyber and physical threats within the United States. The FBI in conjunction with representatives from the private industry, the academic community, and the public sector, further developed the InfraGard initiative to expand direct contacts with the private sector infrastructure owners and operators and to share information about cyber intrusions, exploited vulnerabilities, and infrastructure threats. All 56 field offices of the FBI have opened an InfraGard chapter.

A revision of this currently approved collection is requested in addition to a 3-year extension. 1The revisions on the existing form are:

- <u>PAGE #1</u>

  <u>DATE CHANGE</u>

  10/05/2020

  <u>APPLICANT REQUIREMENTS</u>

  The following bullets were added:

- Applicant must be employed or formerly employed in a Critical Infrastructure for at least three years.

- Full-time students do not qualify for membership.

- Applicants may not have a state or federal felony conviction.

- PAGE #3

CITZENSHIP

A few changes were made to citizenship questions to remove providing proof of citizenship in person at a local FBI field office.

Previously read – Check box that reflects your current citizenship status and provide the applicable documentation:

Changed to – Check box that reflects your current citizenship status.

Bullet removed stating the following:

- Appear in person at the nearest FBI office, with a certified copy of your birth certificate and a government photo ID, such as a driver's license. Contact your local InfraGard Coordinator to make an appointment.

- PAGE #5

In the previous application, applicants were asked three questions related to their employment status. These questions were removed to reduce processing time.

EMPLOYMENT

Three questions were removed:

- **Are you retired?** (y/n) if you are retired, provide the name of your last employer that was related to a critical infrastructure, job title, city, state, and year of retirement.

- **Are you unemployed?** (y/n) If you are unemployed, provide the name of your last employer that was related to a critical infrastructure, job title, city, state and time of employment (mm/yyyy-mm/yyyy)

- **Are you a student?** (y/n) If you are a student, provide school name, address, city, state, degree, area of study and how it relates to a critical infrastructure, and anticipated graduation date.

- PAGE #6

  In the previous application, applicants were asked a question related to security clearance. This question was removed to reduce processing time.

  CLEARANCE

  Removed **Have you EVER had a Security Clearance?** (y/n) If "yes," what type of clearance (Confidential, Secret, TS, etc.) and which agency issued it? (optional short field)

- PAGE #5&6

  In the previous application, applicants were asked a question related to their desire and/or prior affiliation to the InfraGard program.

  Removed

  INFRAGARD CHAPTER

Help Desk Code Word: The HELP desk will use your code word to authenticate you when you contact the HELP desk. Examples include your mother's maiden name, your pet's name, your city of birth, etc. (mandatory short field)

Code Word Hint: This is a word or short statement that will help you remember your Code Word. (mandatory short field)

Have you previously been a member of InfraGard? (y/n) If "yes," which Chapter(s) and time frame? (optional short field If "yes," then skip next question.

How did you hear about InfraGard? Check all that apply. (drop down: Colleague, Meeting Announcement, Presentation, Flyer, Other (include short field to describe what "other" is))

Why do you want to join InfraGard? Check all that apply. (drop down: Assist with the Protection of U.S. Critical Infrastructure, Networking, Liaison with FBI, Liaison with Other LE, Attend Meetings, Access IG Network, Access iGuardian, Participate on National or Local Board, Other (include short field to describe what "other" is))

2. Needs and Uses

The purpose of collecting the information listed in the questionnaire is to categorize approved applicants (members) according to their expertise. In times of need, individuals with specific expertise can be located and contacted for their assistance.

3. Use of Information Technology

The questionnaire will be filled out on-line on an FBI owned secure website by the member. To assist in the processing of the questionnaire the information will sent electronically to the Criminal Justice Information System (CJIS) and the National Name Check Program (NNCP) vetting tools. This on-line questionnaire is being used to provide greater access to the public by using the internet as well as reducing the paperwork involved in the process.

4. Efforts to Identify Duplication

The InfraGard program is the only FBI public outreach program who vets and categorizes its members. The information contained in the questionnaire will allow us to properly categorize the applicants/members. InfraGard is not aware of any other program collecting this information.

5. Minimizing Burden on Small Businesses

This information will have no significant impact on small entities. No small business will be affected by this collection.

6. Consequences of Not Conducting or Less Frequent Collection

If the questionnaire is not used, then the program would be unable to identify a member's expertise. InfraGard's purpose to the FBI is to leverage a member's expertise for national critical infrastructure protection. These individuals are experts in their fields. There may be instances when the FBI needs to contact these experts during times of crisis. Without the ability to identify these people through the questionnaire process, the FBI will not be able to locate members when needed or ensure that members are not given more information than what is relevant to their areas of expertise.

7. Special Circumstances

The member will complete the questionnaire once, which will create a profile that the member can update as needed.

8. Public Comments and Consultations

30 and 60 day notices were published with no comments received.

9. Provision of Payments or Gifts to Respondents

The InfraGard Program has not provided any gifts or payments to participants.

10. <u>Assurance of Confidentiality</u>

For site security and confidentiality purposes, and to ensure that this service remains available to all users, all network traffic is monitored in order to identify unauthorized attempts to upload or change information, or otherwise cause damage or conduct criminal activity. To protect the system from unauthorized use and to ensure that the system is functioning properly, individuals using this computer system are subject to having all of their activities monitored and recorded by personnel authorized to do so by the FBI (and such monitoring and recording will be conducted). Anyone using this system expressly consents to such monitoring and is advised that if such monitoring reveals evidence of possible abuse or criminal activity, system personnel may provide the results of such monitoring to appropriate officials. Unauthorized attempts to upload or change information, or otherwise cause damage to this service, are strictly prohibited and may be punishable under applicable federal law.

Privacy risks identified pertain to the online application via the Internet; in particular, unauthorized access to data and the unnecessary full display of user information were noted as concerns. The process of Certification and Accreditation (C&A) in accordance with the FBI Security Division (SecD), Information Assurance Section, verifies adequate security features are in place to protect the system and the data maintained in it. To mitigate the risks of unauthorized access, role-based access controls have been implemented, based on membership classification. Access to information is based on a need-to-know basis. Privileged users are granted specific role-based permissions to access and view information in accordance with their "need to know". When privileged users require information, only minimum relevant and required information is displayed. Although Social Security numbers are collected for purposes of vetting, they are not displayed except to FBI personnel who need access in order to do the background checks.

Consent is obtained from those who provide information and is shared only consistent with that consent. Members have access to their individual profiles that they can update as needed.

11. Justification for Sensitive Questions

Sensitive questions are used to identify and qualify a person's expertise.

12. Estimate of Applicant's Burden

We estimated the applicant's burden for this data collection as follows:

Number of questionnaires annually	11,100
Frequency of responses	1 per application
Total annual questionnaires	11,100 (average)
Minutes per response	30 minutes electronic
Annual hour burden	5,500 hours

Current InfraGard members will be required to complete the questionnaire for continued InfraGard membership. This will be a one-time task taking approximately 30 minutes to complete.

Means of Submitting	Members	Frequency	Response Time	Annual hour burden
Electronically	11,100	1 time	30 min	5,500

(11,100 X 1 X 30)/60 = 5,500 hours

13. Estimate of Cost Burden

Members will not incur any costs other than their time to respond. Members are not

expected to incur any capital, start-up, or system maintenance costs associated with this information collection.

14. Cost to Federal Government

The estimated cost to the federal government for this data collection is $250,000 based on operational cost of managing the InfraGard Network.

InfraGard Website Operations and Maintenance:	$1,431,193.15
Total	$1,431,193.15

15. Reason for Change in Burden

The existing collection has changed since the last submission due to an update of membership criteria. At this time, the Data Management and Critical Infrastructure Coordination Unit in partnership with InfraGard developed new benchmarks for membership to recruit a more robust membership with technical and industry professionals.

16. Anticipated Publication Plan and Schedule

Once approved, the application will be updated with these changes and the information will be collected and placed in a database.

17. Display of Expiration Date

All information collected under this questionnaire will display the OMB Clearance Number.

18. Exception to the Certification Statement

The InfraGard Program does not request an exception to the certification of this information collection.

19. <u>Collection of Information Employing Statistical</u> <u>Methods.</u>

The information will not be used for statistics on a regular basis. The information collected will be contained in a database which may be used in an ad-hoc report as needed.