

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **EXIS Information System (EXIS)**

**OMB control number 1652-0057**

**Exp.: 4/30/2022**

- 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. (Annotate the CFR parts/sections affected).***

The Exercise Information System (EXIS<sup>®</sup>) is a voluntary, online tool developed by TSA to support the mission of a program developed and implemented by TSA to fulfill requirements of the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act) concerning security exercises.<sup>1</sup> These statutory requirements led to the development of the Intermodal Security Training Exercise Program (I-STEP) for the Transportation Systems Sector (TSS).

I-STEP is a design, development, and tracking resource of security exercises that can assess and improve the capabilities of all surface transportation modes to prevent, prepare for, mitigate against, respond to, and recover from acts of terrorism. Within this program, EXIS<sup>®</sup> is an interactive resource for the TSS. As an interactive system, information collection is necessary for the program to be successful.

Use of EXIS<sup>®</sup> is completely voluntary for industry and government entities (Federal, State, and local) within the TSS. While TSA expects the EXIS<sup>®</sup> tool to be useful to industry, as described above, use of the system would not guarantee compliance with any existing or future TSA, DHS, or other Federal regulation.

- 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.***

EXIS<sup>®</sup> is intended to be used by stakeholders in the TSS with a desire to conduct security exercises, including publicly- or privately-owned transportation companies/agencies or assets. TSA collects five kinds of information online from transportation stakeholders: (1) user registration information; (2) nature and scope of exercise; (3) corrective actions/lessons learned/best practices; (4) evaluation feedback on EXIS<sup>®</sup> itself; and (5) After-Action Reports.

- 1. User registration information.*** TSA collects registration information from all EXIS<sup>®</sup> users. Most likely, these users will be mid-level staffers at the transportation company/agency. TSA uses the information to ensure only those who are involved in transportation security with a “need-to-know” can utilize the features of EXIS<sup>®</sup>, which is necessary because the content may contain Sensitive Security Information (SSI). See 49

---

<sup>1</sup>Pub. L. 110-53, 121 Stat. 266 (Aug. 3, 2007). See 9/11 Act secs. 1407 (public transportation, codified at 6 U.S.C. 1136(a)), 1516 (railroads, codified at 6 U.S.C. 1166), and 1533 (over-the-road buses, codified at 6 U.S.C. 1183).

CFR part 1520. Although participation in EXIS<sup>®</sup> is voluntary, for those who choose to participate TSA requires those respondents to submit registration information.

TSA collects the User's Name, Agency/Organization Name and Type, Job Title, Supervisor or other Sponsor's Name, Professional Phone Number, Professional Email Address, Employment Verification Contact Name, Employment Verification Contact Information, and the Reason for Needing an EXIS<sup>®</sup> account. In addition, the following optional registration information can be added by the user: Professional (business), Country, City, State, Zip Code, Mobile Phone Number, Alternate Email, and Preferred Transportation Sector.

In addition, because EXIS<sup>®</sup> content may contain SSI, all users are also required to submit an electronic non-disclosure agreement (NDA) pertaining to SSI usage.<sup>2</sup> Furthermore, all users are required to review and acknowledge review of SSI handling and protection requirements. The burden of reading and acknowledging the NDA and the SSI handling and protection requirements is accounted for in the registration burden estimate under Question 12.

2. *Desired nature and scope of the exercise.* After users are registered, the EXIS<sup>®</sup> user can provide information regarding the nature and scope of the exercise that they would like to conduct. TSA then can access this information in order to generate an appropriate exercise for the user. Such information includes:

- Exercise Properties
- Objectives
- Scenario Events
- Participating Agencies
- Exercise Attendees
- Pre-Exercise Data (to assess the user's state of readiness for a transportation security incident prior to initiating the training exercise)

3. *Corrective actions/lessons learned/best practices.* After the completion of the exercise, the EXIS<sup>®</sup> user can input information regarding the exercise. The EXIS<sup>®</sup> user can ultimately use this information for generating an "After-Action Report". TSA also collects this information in order to capture lessons learned and best practices. Such information includes:

- Corrective Actions
- Best Practices
- Lessons Learned

4. *Evaluation feedback.* Users can submit feedback on EXIS<sup>®</sup> itself through a voluntary evaluation survey called the "Evaluation Team Feedback". TSA collects this information for the purpose of evaluating the usefulness of EXIS<sup>®</sup> in facilitating security training exercises for the users. TSA can then modify EXIS<sup>®</sup> to better suit its users' needs. This survey encompasses:

- Evaluation Materials
- Evaluator Training

---

<sup>2</sup> To the extent that exercise information and results may be SSI in accordance with 49 U.S.C. 114(r) and 49 CFR Part 1520, TSA will protect it as such.

- Team Composition
- Logistics

5. *After-Action Reports*. Finally, as previously mentioned, EXIS® users can access data to generate and/or submit formal “After-Action Reports” which may include:

- Exercise Overview
- Goals and Objectives
- Event Synopsis
- Analysis of Critical Issues
- Exercise Design Characteristics
- Conclusions
- Executive Summary

A user’s exercise data is only accessible to other users who have been granted access by the user to that exercise. By default, users have no access to other users exercise data. Stakeholders use the report to identify strengths or areas in which they can assign resources to mitigate risk and enhance the security posture within their organization.

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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]***

EXIS® is an electronic system, accessible through the Internet, and all information is collected electronically; thus, this information collection is compliant with GPEA. The basis for adopting an online submission process includes ease of accessibility for EXIS® users, ease of information storage, and ease of control over information dissemination. Users can go to “<https://exis.tsa.dhs.gov/default.aspx>” to access the public-facing EXIS® site and to request access by inputting registration information.

4. ***Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.***

TSA is not aware of any other web portal in the government that is designed to generate transportation security training exercises and to record the data/results of such exercises. The purpose of EXIS® is unique, and therefore any similar information already available cannot be modified to accomplish it.

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

The collection of information does not have a significant impact on a substantial number of small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

There has been growing demand among government and industry security partners across the nation to expand I-STEP, which TSA developed and implemented to fulfill the 9/11 Act requirement<sup>3</sup> for DHS to establish an exercise program for the TSS. I-STEP brings public and private sector partners together to exercise, train, share information, and address transportation security issues to protect travelers, commerce, and infrastructure. Through the program, TSA facilitates modal and intermodal exercises and workshops throughout the country. The program also provides training support to help modal operators meet their training objectives.

Without EXIS<sup>®</sup>, there is no similar platform to make this information available. Using EXIS<sup>®</sup>, transportation stakeholders have access to a system that will allow them to generate and conduct security exercises, expanding the reach and effectiveness of the I-STEP program and its mission to improve the capabilities of all surface transportation modes to prevent, prepare for, mitigate against, respond to, and recover from acts of terrorism. EXIS<sup>®</sup> also collects lessons learned and best practices from such exercises and makes them available for the benefit of members of the TSS that participate in EXIS<sup>®</sup>.

Because an interactive system like EXIS<sup>®</sup> requires the user to provide information, without the information collection the user could not make selections and the system would not be able to generate these documents; conversely, without the system-generated documents, the user would not be able to conduct their exercise. Once the user gains access and logs in, they are prompted to enter a variety of information related to the exercise they would like to create. This information ranges from basic input fields, such as the name, date, and location of the exercise, to more substantial requirements, including selecting exercise objectives, tasks, and a scenario. Once the user has submitted their information, the system uses their selections to generate customized exercise documents that are ready to be used to conduct the final exercise.

Failure to collect this information would limit TSA's ability to effectively test security countermeasures, security plans, and the ability of a modal operator to respond to and quickly recover after a transportation security incident. The TSS has over 100,000 operators that need support from TSA, and insufficient awareness, prevention, response, and recovery to a transportation security incident would result in increased vulnerability of the U.S. transportation network and a reduced ability of DHS to assess system readiness. The personnel resource requirements for conducting a security exercise using the resources of the I-STEP program team limit the availability of this resource to transportation stakeholders. EXIS<sup>®</sup> is a voluntary, online tool developed by TSA that supports the I-STEP mission by expanding the availability of these resources and enhancing the partnership with TSS stakeholders. Based on consultations with its TSS stakeholders, TSA developed EXIS<sup>®</sup> as a

---

<sup>3</sup> See 9/11 Act secs. 1407 (public transportation, codified at 6 U.S.C. 1136(a)), 1516 (railroads, codified at 6 U.S.C. 1166), and 1533 (over-the-road buses, codified at 6 U.S.C. 1183).

technology platform to expand both I-STEP resources and the availabilities of these resources for TSS operators. EXIS<sup>®</sup> was designed by the Federal government with input from industry partners to support their risk reduction efforts, both in the initial design of the program and for its ongoing operations.

Failure to collect user registration information would prevent TSA from making this system available to transportation stakeholders as TSA would not have the ability to evaluate whether transportation stakeholders have a “need-to-know” in order to access and use EXIS<sup>®</sup>. EXIS<sup>®</sup> is an SSI-level system. Therefore, collection of registration information is necessary in order to determine whether users should have access to the system.

In addition, failure to collect/monitor information regarding the nature and scope of the user’s desired exercise would prevent TSA from properly generating a relevant and useful training exercise for the user. A failure to collect corrective actions, best practices, lessons learned, and After-Action Reports from the user once the exercise is complete would hamper TSA’s attempt to record and document security feedback as well as TSA’s ability to disseminate such information to other members of the TSS.

Finally, a failure to collect feedback on EXIS<sup>®</sup>’s performance would limit TSA from adjusting the properties and capabilities of EXIS<sup>®</sup> to better suit the needs of the TSS.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).**

TSA will conduct this collection in a manner consistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

**8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) 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.**

Pursuant to 5 CFR 1320.8(d), TSA published a 60-day notice soliciting comments from persons outside of the agency regarding the data collection procedures of EXIS. See 86 FR 25419 (May 3, 2021). TSA later published a 30-day notice soliciting further comments. See 86 FR 49557 (September 3, 2021). This notice generated no further comments on the collection.

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

TSA will not provide payment or gifts to respondents.

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

TSA will not provide any assurance of confidentiality to respondents. TSA will gather and store all information pursuant to the Privacy Act, as applicable, as well as any information deemed SSI pursuant to 49 CFR Part 1520. The collection is covered by a Privacy Impact Assessment (PIA), DHS/ALL/PIA-006 General Contact Lists (June 15, 2007). In addition, the collection is covered by the following System of Records Notices, DHS/ALL-004 General Information Technology Access Account Records System and DHS/ALL-002 DHS Mailing and Other Lists System. See 77 FR 71659 (November 25, 2008) and 73 FR 71659 (November 25, 2018), respectively.

**11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

TSA does not ask questions of a private, sensitive nature.

**12. Provide estimates of hour burden of the collection of information.**

TSA estimates the total annualized hour burden for EXIS®'s collection of information to be 7,090.63 hours, and the annualized hour burden cost to be \$633,925.19. TSA estimates that there will be approximately 11,500 primary and secondary access users in 2021; 14,350 users in 2022; and 18,250 users in 2023; for an average annual respondents estimate of 14,700.<sup>4</sup> Of these, TSA estimates that 2,050 will be primary access users, and this number will remain constant throughout the 3-year period of analysis. The number of secondary access users will be 9,450 in Year 1; 12,300 in Year 2; and 16,500 in Year 3 (see Table 1).

**Table 1: Estimated Population (All Users)**

Year	Full Access Users	Limited Access Users	Total Users
2021	2,050	9,450	11,500
2022	2,050	12,300	14,350
2023	2,050	16,200	18,250
Total	6,150	37,950	44,100
Annualized	<b>2,050</b>	<b>12,650</b>	<b>14,700</b>

Note: Calculations may not be exact due to rounding in tables.

TSA then estimates the number of full access users that will design and conduct an annual exercise and their hourly burden (Table 2). Of the full access population (A), TSA estimates 50 percent will conduct one exercise per year. That number is then multiplied by 3.5 hours, the amount of time spent designing and conducting an exercise.

**Table 2: Full Access Exercise Design Burden Hours**

Year	Full Access Users	Primary/Full Access Exercise Design Responses	Hour Burden = Responses x (3.5 hrs)
------	-------------------	---	-------------------------------------

<sup>4</sup> Estimate provided by TSA's Intermodal Security Training and Exercise Program Office.

	<b>A</b>	<b>B = 50% of A</b>	<b>C = B x 3.5</b>
2021	2,050	1,025	3,587.5
2022	2,050	1,025	3,587.5
2023	2,050	1,025	3,587.5
Total	6,150	3,075	10,762.5
Annualized	<b>2,050.0</b>	<b>1,025</b>	<b>3,587.5</b>

Note: Calculations may not be exact due to rounding in tables.

Next, TSA estimates the number of new limited access users that will design and conduct an annual exercise (Table 3). TSA estimates that 5 percent of the new limited users will conduct an annual exercise, and multiplies this number by 3.5 hours.

**Table 3: New Limited Access Exercise Design Burden Hours**

<b>Year</b>	<b>New Limited Access Users</b>	<b>Limited Access Responses</b>	<b>Hour Burden = Responses x (3.5 hrs)</b>
	<b>A</b>	<b>B = 5% of A</b>	<b>C = B x 3.5</b>
2021	1,800	90.0	315.0
2022	2,850	142.5	498.8
2023	3,900	195.0	682.5
Total	8,550	427.5	1496.3
Annualized	<b>2,850</b>	<b>142.5</b>	<b>498.8</b>

Note: Calculations may not be exact due to rounding in tables.

In addition, TSA estimates that all limited access users not conducting an exercise will participate in a survey (Table 4). TSA reduced the number of surveys for limited access users from Table 1 per year by the number of limited access user incurring the exercise design burden in Table 3. The number of limited access users conducting a survey only is multiplied by the amount of time to conduct the survey (15 minutes or 0.25 hour) to obtain the survey hour burden.

**Table 4: Limited Access Survey Burden Hours**

<b>Year</b>	<b>Number of Limited Access Users</b>	<b>Number of Limited Access Survey Responses</b>	<b>Hour Burden = Survey Responses x (0.25 hr)</b>
	<b>A</b>	<b>B = 95% of A</b>	<b>B = A x 0.25</b>
2021	9,450	8,977.5	2,244.4
2022	12,300	11,685.0	2,921.3
2023	16,200	15,390.0	3,847.5
Total		36,052.5	9,013.1
Annualized		<b>12,017.5</b>	<b>3,004.4</b>

Note: Calculations may not be exact due to rounding in tables.

The sum of the total annualized hour burden for the full access exercise population and limited access population conducting an annual exercise (Tables 2 and 3), plus limited access exercise population participating in a survey only (Table 4), is 7,090.6 hours. Table 5 provides the calculations.

**Table 5: Total Hour Burden**

Year	Full Access Users Exercise Design Burden Hours	Limited Access Users Exercise Design Burden Hours	Limited Access User Survey Burden Hours	Total Hour Burden
	A	B	C	D = A + B + C
2021	3,587.50	315.00	2,244.38	6,146.88
2022	3,587.50	498.75	2,921.25	7,007.50
2023	3,587.50	682.50	3,847.50	8,117.50
Total	10,762.50	1,496.25	9,013.13	21,271.88
Annualized	<b>3,587.50</b>	<b>498.75</b>	<b>3,004.38</b>	<b>7,090.63</b>

Note: Calculations may not be exact due to rounding in tables.

TSA estimates the annualized hour burden cost to respondents to be \$633,925. This is calculated based on the annualized respondent hour burden (7,090.6) multiplied by a respondent's average fully loaded hourly wage rate of \$89.40.<sup>5</sup> See Table 6 for the calculations.

<sup>5</sup>TSA calculated the weighted average wage rate of \$61.45 for the hourly burden for managers in multiple transportation modes based on past participation per mode and the average hourly wage rate for managers. TSA used the Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) data on Standard Occupation Code (SOC) 11-1021 General and Operations Managers for each transportation mode that has participated in EXIS®. Aviation had 403 participants, NAICS 481000 - Air Transportation had an average hourly wage rate of \$66.22), Maritime had 33 participants (NAICS 483000 - Water Transportation had an average hourly wage rate of \$70.65), Highway and Motor Carrier had 66 participants (484000 Truck Transportation, 485200 Interurban and Rural Bus Transportation had average hourly wages of \$52.96 and \$52.54, respectively, resulting in Highway and Motor Carrier average of \$52.75), Mass Transit and Passenger Railroads had 165 participants (NAICS 485100 Urban Transit Transportation had an average hourly wage rate of \$48.61), Pipeline had 34 participants (NAICS 486000 Pipeline Transportation had an average hourly wage rate of \$61.30), Postal and Shipping had 3 participants (NAICS 491000 Postal Service Transportation had an average hourly wage rate of \$66.60), Freight Railroads had 154 participants (NAICS 482000 - Rail Transportation had an average hourly wage rate of \$64.40). TSA then accounts for compensation and benefits with a compensation factor of 1.454956653, calculated by total compensation of \$38.60 divided by wages of \$26.53 for All Civilian Workers. TSA multiplies the weighted average hourly wage rate \$61.45 by 1.454956653 to calculate a loaded wage rate of \$89.40. Sources: BLS, OES, SOC, [https://www.bls.gov/oes/2020/May/naics3\\_481000.htm](https://www.bls.gov/oes/2020/May/naics3_481000.htm) [https://www.bls.gov/oes/2020/May/naics3\\_483000.htm](https://www.bls.gov/oes/2020/May/naics3_483000.htm) [https://www.bls.gov/oes/2020/May/naics3\\_484000.htm](https://www.bls.gov/oes/2020/May/naics3_484000.htm) [https://www.bls.gov/oes/2020/May/naics4\\_485100.htm](https://www.bls.gov/oes/2020/May/naics4_485100.htm) [https://www.bls.gov/oes/2020/May/naics3\\_486000.htm](https://www.bls.gov/oes/2020/May/naics3_486000.htm) [https://www.bls.gov/oes/2020/May/naics3\\_491000.htm](https://www.bls.gov/oes/2020/May/naics3_491000.htm) [https://www.bls.gov/oes/2020/May/naics3\\_482000.htm](https://www.bls.gov/oes/2020/May/naics3_482000.htm).

OES data: Last Modified Date: March 31, 2021, Access Date: 6/3/2021) BLS, Employer Costs for Employee Compensation (ECEC), News Release, Table 1, (Total Compensation for Civilians, Private Sector, Local and State Government Employees). Data as of December 2020, released March 18, 2021. [https://www.bls.gov/news.release/archives/ecec\\_03182021.htm](https://www.bls.gov/news.release/archives/ecec_03182021.htm)



**Table 6: Respondent Hour Burden Cost**

Year	Respondent Hour Burden	Hour Burden Cost = Response Hours x \$89.40
2021	6,146.88	\$549,550.83
2022	7,007.50	\$626,493.54
2023	8,117.50	\$725,731.19
Total	21,271.9	\$1,901,775.56
<b>Annualized</b>	<b>7,090.6</b>	<b>\$633,925.19</b>

Note: Calculations may not be exact due to rounding in tables.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

TSA estimates no additional costs beyond hour burden for respondents.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.**

TSA estimates the total cost to the Federal government associated with the EXIS<sup>®</sup> information collection request to be approximately \$816,474.50 annually. This includes TSA staff costs and other infrastructure costs to maintain and update EXIS<sup>®</sup>. TSA staff costs were calculated by assuming a H/I band program analyst receiving an annual H/I band blended fully-loaded compensation of \$120,983.<sup>6</sup> Program analysts will each spend approximately 20 hours per week on EXIS<sup>®</sup>-related duties. This estimate was used to calculate a TSA FTE of 1.5 (3 employees multiplied by 20 hours per week multiplied by 52 weeks (3,020) then divided by 2,087 hours.<sup>7</sup> TSA multiplies \$120,983 by 1.5 FTE to estimate a program analyst cost of \$181,474.50. In addition, TSA estimates the annual contracting cost to be \$635,000.00 based on an existing EXIS<sup>®</sup> contract. The total annual cost to government is  $\$181,474.50 + \$635,000 = \$816,474.50$ , or  $\$2,449,423.50$  over 3 years.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

TSA updated the information collection with the latest data and population assumptions.

<sup>6</sup> TSA summed the annual fully loaded compensation for H & I band of \$90,186 and \$151,780, respectively and divided by 2 to calculate an average of \$120,983 blended H/I annual loaded rate.

<sup>7</sup> OPM changed the 2080 work hours to 2087 by amending 5 U.S.C. 5504(b), the latter is assumed to capture year-to-year fluctuations in work hours. Source: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. Law 99-272, April 7, 1986).

- 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.**

User registration information will not be published. Information regarding exercise properties, lessons learned, and best practices from past exercises will be made available online to certain users in the aggregate after removal of personal, proprietary, time, date, and location information.

As previously discussed, an EXIS<sup>®</sup> user has the ability to limit the availability of his/her exercise information to a select group of other EXIS<sup>®</sup> users by creating an exercise community. EXIS<sup>®</sup> communities are not “bulletin boards” in the sense that all members of the community can contribute information. Rather, the community owner can post information regarding his/her exercise and other community members can only observe the posted information. Because such information may be SSI, all EXIS<sup>®</sup> users will have unique usernames and passwords that meet or exceed the DHS standards of SSI access to log into EXIS<sup>®</sup>. An SSI Content Management Plan has been approved for EXIS<sup>®</sup> by the Office of Intelligence, and EXIS<sup>®</sup> hardware and software have been approved to handle SSI by the Office of Information Technology.

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

Not applicable.

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

Not applicable.