# Narrative of Revisions

Collection Title: Chemical Facility Anti-Terrorism Standards (CFATS) Personnel Surety Program

OMB Control No.: 1670-0029

Current Expiration Date: 05/31/2022

Collection Instrument(s): CFATS Personnel Surety Program

The collection revisions are as follows:

* Minor revision to the instrument that reflects the passage of the Cybersecurity and Infrastructure Security Act of 2018, 6 U.S.C. §§ 651-74, such as updating the Agency name to conform with the Agency’s new designation as CISA. CISA is not proposing change to the scope of the instrument.
* Decrease the annual number of responses from 203,305 to 149,271 responses which is a decrease of 54,304 responses. The revision is based on historical data and a revision in the methodology about how CISA accounts for new facilities. Notably, the new methodology: (a) remove the costs associated with capital/startup costs because they are incorporated within the estimated number of respondents; (b) increases the annual hires rate from 47.8% to 57.3% for total private industry, as estimated from the Bureau of Labor Statistics (BLS), and (c) increases the number of annual respondents from 72,607.
* An decrease of 9,005 hours of the annual time burden from 33,884 hours to 24,879 hours when compared to the previously approved annual time burden.
* A decrease in the annual cost burden of $2,957,074 from $5,158,226 to $2,201,152 which reflects (a) removal of the costs associated with capital/startup costs because they are incorporated within the estimated number of respondents, and (b) an increase of the annual reporting and recordkeeping hour and cost burden from 12,101 hours to 24,879 hours as a result of the revised methodology.
* An increase in the annual cost from $1,719,409 to $2,201,152 because of the increase in annual hours as well as an increase in the respondent wage rate from $85.82/hour to $88.48/hour, which is based on updated BLS data.
* A decrease of the overall total annual operating cost to the Federal Government for this collection from $1,001,189 to $495,581 based on the projected costs for the government to vet records and the number of submissions.