

## Supporting Statement for Paperwork Reduction Act Submissions

**Title:** Sector Outreach and Programs Division Online Meeting Registration Tool

**OMB Control Number:** 1670-0019

### 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.

The Critical Infrastructure Protection Act of 2001, 42 U.S.C. 5195c, states that any physical or virtual disruption of the operation of the critical infrastructures of the United States be rare, brief, geographically limited in effect, manageable, and minimally detrimental to the economy, human and government services, and national security of the United States; and that actions necessary to achieve the policy stated be carried out in a public-private partnership involving corporate and non-governmental organizations. On behalf of the DHS, the Cybersecurity and Infrastructure Security Agency's Infrastructure Security Division (CISA ISD) manages the Department's program to protect the Nation's 16 critical infrastructure sectors by implementing the National Infrastructure Protection Plan (NIPP) 2013, Partnering for Critical Infrastructure Security and Resilience. Pursuant to Presidential Policy Directive 21 on Critical Infrastructure Security and Resilience (February 2013), each sector is assigned a Sector-Specific Agency (SSA) to oversee Federal interaction with the array of sector security partners, both public and private. An SSA is responsible for leading a unified public-private sector effort to develop, coordinate, and implement a comprehensive physical, human, and cyber security strategy for its assigned sector. There are six critical infrastructure sectors assigned to ISD, including the Chemical sector. In addition to fulfilling the regulatory obligations set forth by Congress, the CISA Office of Chemical Security coordinates with the builds sustainable partnerships with its public and private sector stakeholders to enable more effective coordination, information sharing, and program development and implementation. These partnerships are sustained through the NIPP Sector Partnership Model<sup>1</sup>.

Information sharing is a key component of the NIPP Partnership Model, and DHS sponsored conferences are one mechanism for information sharing. To facilitate conference planning and organization. This voluntary information collection tool for online event registration is maintained and leveraged by the Office of Chemical Security. The information collected with this tool is used to register public and private sector stakeholders for meetings hosted by the Office of Chemical Security, and is also used for private sector stakeholders to register their interest in being contacted by chemical security personnel regarding services provided under the voluntary ChemLock security program. The Office of Chemical Security uses the information collected to ensure that sufficient space and resources are available at meetings; to follow up with registrants when required; to develop meeting materials for attendees; and efficiently generate attendee and speaker nametags. Additionally, it enables the Office of Chemical Security to gain a better understanding of the

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<sup>1</sup> NIPP 2013 Partnering for Critical Infrastructure Security and Resilience, pp 10-12.

organizations participating in chemical security events, and subsequently also identify which segments of the sector are underrepresented. This then allows for the Office to target these underrepresented sector elements through outreach and awareness initiatives.

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 collection of information involves the use of an online meeting registration tool. The tool allows the individuals registering for the events to go to the registration site and enter their information. The information to be collected by the registration tool includes:

- a) Registration Type (drop down selection)
- b) Attendee Name (open field)
- c) Attendee Email Address (open field)
- d) Attendee Job Title (open field)
- e) Attendee Organization (open field)
- f) Organization Website (open field)
- g) Organization Country (drop down selection)
- h) Organization Zip/Postal Code (open field)
- i) First time attending? (yes/no)
- j) How did you hear of this event? (open field)
- k) ADA accommodations (yes/no)
- l) *If yes to ADA accommodations, may we contact you directly regarding appropriate accommodations? (yes/no)*
- m) Organization Category (Public Sector, Private Sector, International, Other (open field))
- n) Public Sector Category (Federal, State, Local, Other (open field))
- o) Private Sector Category (Academia, Chemical end-user, Chemical Manufacturing/Processing, Chemical Storage/Stockpile/Distribution, Chemical Transport, Industry Organization, Non-governmental Organization, Non-profit Organization, Trade Organization, Other (open field))
- p) Organization Size (1-49, 50-99, 100-499, 500+)
- q) Organization Trade Association Affiliation(s) (open field)

The information then is housed in a secure database. Information collected is only used by the Office of Chemical Security, and contact information is only used beyond the immediate purposes of registration with the consent of the submitter. By using this information technology, the Office of Chemical Security does not need to manually input the personal information collected from each of the meeting registrants. Additionally, the Office's burden is reduced because the information technology used has the capability to produce reports based on the information collected to better understand the representation of the event's attendees.

The Office of Chemical Security uses the information collected to reserve space at the meeting for the registrant, contact the registrant with a reminder about the event, develop meeting materials for attendees, target and focus conference agendas, plan for future conferences, and identify underrepresented elements of the sector to engage.

Specific information collected during the registration process assists the Office of Chemical Security in determining who is represented at the conference. The Office utilizes this information to improve planning for future events and to ensure that the conference content is applicable and beneficial for attendees.

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.

Use of the online registration tool significantly reduces the burden on the registrant and on the Office of Chemical Security, as the collecting agency. The registration process takes the registrant no more than six minutes to complete, with an average of three minutes. It also does not require the registrant to submit the information via fax or via mail, which simplifies the collection process for the registrant.

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.

As this information is submitted to express the registrant's intention to attend a specific event, the information received will be different for each event and, as a result, existing information cannot be used or modified.

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.

The collection of information should not impact 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.

By not collecting this information prior to an event, the Office of Chemical Security will not know the number of stakeholders planning to participate in critical infrastructure protection events. Additionally, the number and type of organizations represented at the event will not be known. This would prevent the Office of Chemical Security from ensuring the event will be tailored to the needs of the stakeholder.

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.

There are no special circumstances that would cause the information collected to be conducted in a manner inconsistent with guidelines.

**8. Federal Register Notice:**

- a. Provide a copy and identify the date and page number of the 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.

	<b>Date of Publication</b>	<b>Volume #</b>	<b>Number #</b>	<b>Page #</b>	<b>Comments Addressed</b>
<i>60-Day Federal Register Notice:</i>	4/5/2023	88	20176	20176-20177	0
<i>30-Day Federal Register Notice</i>	8/29/2023	88	59532	59532-59533	0

A 60-day notice for comments was published in the Federal Register on April 5,2023. 0 comments were received.

A 30-day notice for comments was published in the Federal Register on 8/29/2023. 0 comments were received related to the 30-day notice.

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 associated with this collection. The information will be kept private or anonymous to the extent allowable by law.

The DHS Privacy Office review finds that this a privacy sensitive collection requiring a Privacy Impact Assessment (PIA) and Systems of Records Notice (SORN). The collection is covered under the Department of Homeland Security General Contact Lists Privacy Impact Assessment, DHS/ALL/PIA-006 dated June 15, 2007, and the DHS/ALL-002 - Department of Homeland Security (DHS) Mailing and Other Lists System of Records Notice (SORN), published to the Federal Register on November 25, 2008, 73 FR 71659.

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 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.

It is estimated that it will take each participant 3 minutes to complete the registration process. For 1,600 non-Federal respondents annually, the burden is 80 hours.

This collection only pertains to one form/registration screen.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent (State, local, tribal, territorial, or private sector) <i>[Estimated from 2016 attendance of 355 with potential increase of registrants]</i>	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
Executives	420	1	0.05	21	\$145.24	\$3,049.97
Management Analyst	140	1	0.05	7	\$68.54	\$479.79
Security Analyst	1040	1	0.05	52	\$77.38	\$4,023.57
<b>Totals</b>	<b>1600</b>			<b>80</b>		<b>\$7,553.33</b>

CISA estimates that 420 executives will spend a total of 21 hours at an average compensation rate of **\$145.24** ( $\$102.41^2$  mean wage rate x 1.4182 benefit multiplier<sup>3</sup> = \$138.05) to complete the registration process, an estimated 140 management analysts will spend 7 hours at an average compensation rate of **\$68.54** ( $\$48.33^4$  mean wage rate x 1.4182 benefit multiplier = \$68.54), and 1,040 security analysts will spend 52 hours at an average compensation rate of **\$77.38** ( $\$54.56^5$  mean wage rate x 1.4182 benefit multiplier = \$77.38), for an estimated total annual respondent cost of **\$7,553**.

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 annualized capital or start-up costs for respondents due to this 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

<sup>2</sup> BLS Occupational Employment Statistics. May 2021 Chief Executive (11-1011). [Chief Executives \(bls.gov\)](https://www.bls.gov/oes/current/oes111011.html)

<sup>3</sup> BLS. Employer Costs for Employee Compensation – December 2022. Private Industry Workers, , Data from September 2022, released on December 15, 2022. [Employer Costs for Employee Compensation Summary - 2022 Q03 Results \(bls.gov\)](https://www.bls.gov/news.release/comp22.pdf). The compensation factor of 1.4182 is estimated by dividing total compensation (\$39.61) by wages and salaries (\$27.93).

<sup>4</sup> BLS Occupational Employment Statistics. May 2021 Management Analyst (13-1111). [Management Analysts \(bls.gov\)](https://www.bls.gov/oes/current/oes131111.html)

<sup>5</sup> BLS Occupational Employment Statistics. May 2021 Information Security Analyst (15-1122). [Information Security Analysts \(bls.gov\)](https://www.bls.gov/oes/current/oes151122.html)

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.

<b>Cost Category</b>	<b>Description of Expense</b>	<b>Total Annual Cost</b>
Equipment Cost	Online Registration Tool Annual use fee	\$23,378.74
Registration Cost	Cost per registrant \$3.29 x Number of possible registrant slots 7,106 = \$38,725.03	\$38,725.03
<b>Total</b>		<b>\$62,103.77</b>

There are no initial capital costs for the data collection. There is no cost for personnel to review/manage the information. In sum, the estimated total annual operating cost to the United States Government for this collection is **\$62,104** for the use of the CVENT registration tool.

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 revision of the existing collection. These changes include: changes to the burden costs, annual government costs, and revising and adding data fields.

In addition to the removal of historically retained fields that collect redundant or unnecessary information, and updating existing fields for accuracy and ease of use, additional fields has been added. These additional data fields are not anticipated to increase the burden per response.

- ‘How did you hear of this event,’ a field which was included in the original instrument for this collection, and removed in a previous revision, has now been re-added to the instrument
- Open field to input the registrant’s company website

The annual burden cost for the collection has increased by \$5,751 from \$1,802 to **\$7,533**, due to the shift to a hybrid event with additional virtual attendees, as well as updated compensation rates.

The annual government cost for the collection has increased by \$53,757, from \$8,347 to **\$62,104**, due to an increase in the number of registrations from the transition to a hybrid event. This increase is despite a decrease in the cost per registrant from \$7.19 to \$3.29 per registrant.

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.

This information collection will not be published for statistical purposes

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 Office of Management and Budget 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.