

Supporting Statement for Paperwork Reduction Act Submissions

Title: Infrastructure Visualization Platform (IVP) Pre-Collection Questionnaire

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.

The Homeland Security Presidential Directive-7 (HSPD-7) (2003), Presidential Policy Directive-21 (PPD-21) (2013) and the National Infrastructure Protection Plan (NIPP) (2013) highlight the need for a centrally managed repository of infrastructure attributes capable of assessing risks and facilitating data sharing. To support this mission need, the Department of Homeland Security's (DHS) Cybersecurity and Infrastructure Security Agency (CISA) Infrastructure Security Division (ISD) has developed a data collection system (CISA Gateway) that contains several capabilities which support the homeland security mission in the area of critical infrastructure (CI) protection. 6 USC § 652 (c) and (e) authorize the collection of the below information.

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.

For a Protective Security Advisor (PSA) to conduct an assessment, each stakeholder must complete an Infrastructure Visualization Platform (IVP) Pre-Collection Questionnaire. When the form is completed and submitted, the IVP team can better plan for the collect by reviewing locations designated as Areas of Emphasis (AOEs) to ensure those areas are collected, to know who appropriate points of contact are (stakeholder requesting and escort who will be with the team during the collect), and to address special considerations prior to showing up for the collect.

The IVP Pre-Collection Questionnaire is then stored on a password protected and secured hard drive only accessible by IVP team members along with all data that has been collected from the site. That data includes geospatial views (satellite views of the site), floorplans (provided by the site), panoramic photos and videos, and any other supplemental data provided by the site (SOPs, emergency evacuation routes, etc.)

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 IVP Pre-Collection Questionnaire is a fillable adobe form that is completed by the PSA and stakeholder. CISA conducted usability testing on the form to help with determination of the burden hours and to verify the ease of use. The results were recorded and used in the creation of the burden tables for this collection.

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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.

There is no duplicate effort to attain this information. The IVP Pre-Collection Questionnaire is a standalone document.

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.

N/A

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.

Without the form, the IVP team will have a very hard time planning for an IVP collection. The form allows the IVP team to better plan for the collection by reviewing locations designated as Areas of Emphasis (AOEs) to ensure collection occurs from those, to know who the appropriate points of contact are (stakeholder requesting and escort who will be with the team during the collect), and to address special considerations prior to showing up for the collect.

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.

This is a one-time effort by the PSA and stakeholder.

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

IVPs are generally scheduled 30-60 days out. The information we require is generally completed well before the 30 days after receipt.

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

N/A

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

N/A

(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.

N/A

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

N/A

(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.

N/A

(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.

Information provided by the stakeholder is at their discretion as the IVP is a voluntary program.

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.

	Date of Publication	Volume #	Number #	Page #	Comments Addressed
<i>60-Day Federal Register Notice:</i>	5/21/2024	89	99	44695-44696	0
<i>30-Day Federal Register Notice</i>	8/28/2025	90	165	42029-42030	0

A 60-day notice for comments was published in the Federal Register on May 21, 2024.

A 30-day notice for comments was published in the Federal Register on August 28, 2025.

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

No payment or gift to respondents. The completed IVP product is all that is received.

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

Information is retained by the IVP team. The IVP Pre-Collection Questionnaire is stored along with all data that has been collected from the site. That data includes geospatial views (satellite views of the site), floorplans (provided by the site), panoramic photos and videos, and any other supplemental data provided by the site (SOPs, emergency evacuation routes, etc.) Information on this form is not shared outside of the collecting office.

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.

N/A

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.

The Cybersecurity and Infrastructure Security Agency (CISA) estimates that 120 participants will respond to the IVP Pre-Collection Questionnaire per year. For the purpose of estimating the burden of this collection, we assume one response per respondent.

The numbers of respondents and time burdens are shown in Table 1. CISA estimates that the IVP Pre-Collection Questionnaire will take 0.5 hours (30 minutes) to complete.

To estimate the cost of this collection, CISA multiplies the estimated annual hour burden by the hourly compensation rate for “All Occupations” from the May 2022 Bureau of Labor Statistics National Occupational Employment and Wage Estimates¹. The selection of “All Occupations” was chosen as the expected respondents for this collection could be expected to be from any occupation. To account for benefits and compensation, this average wage for “All Occupations” of \$29.76 was multiplied by the wage rate benefit multiplier of 1.4155² to produce an hourly compensation rate of \$42.12. Multiplying the total annual burden (60) by this hourly compensation rate (\$42.12) provides an estimated annual cost of \$2,527. The cost is displayed in Table 1.

Form Name & Number	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
<i>IVP Pre-Collection Questionnaire</i>	120	1	0.5 (30 mins)	60	\$42.15	\$2,527

- 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.)

¹ [May 2022 Bureau of Labor Statistics](#)

² Load factor calculated based on the Employer Cost for Employee Compensation, released on December 15, 2023 ([Employer Costs for Employee Compensation News Release - 2023 Q03 Results \(bls.gov\)](#)), Table 4. Employer Cost for Employee Compensation for Private Industry Workers by Occupational and Industry Group, all private workers. Load Factor (1.4155) = Total Compensation (\$41.53) / Wages and Salaries (\$29.34).

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.

To determine the cost to the federal government for this collection, CISA estimated the time burden required for the government to review the collected information. CISA estimated that 2 government employees at a GS-14, Step 1 will spend approximately 12 hours of their time annually to review questionnaire responses and provide analysis and feedback. Total Federal hours spent on this survey will be 24 hours annually (2 staff x 12 hours each).

Using the FY23 (Washington-Baltimore-Northern Virginia) GS pay scale, the fully-loaded wage rate for a GS14, Step 1 is \$107.32 (\$63.43³ hourly base wage rate x 1.69194 benefit multiplier⁴ = \$107.32 fully-loaded wage rate).

The annual government cost is estimated to be \$2,576 (24 hours x \$107.32 = \$2,576).

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.

N/A

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.

N/A

³ [Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/salaries-grades/pay-and-leave/salaries-wages/)

⁴ CBO. Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015. April 2017. <https://www.cbo.gov/publication/52637>
According to Table 4, Average Total Compensation for all levels of education is \$64.80. According to Table 2, Average wages for all levels of education is \$38.30. We estimate the compensation factor by dividing total compensation by average wages.

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

N/A

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

N/A