Supporting Statement for Paperwork Reduction Act Submissions

Title:

OMB Control Number: 1670-0047

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 Cybersecurity and Infrastructure Security Agency Act of 2018 (P.L. 115-278) created the Cybersecurity and Infrastructure Security Agency (CISA). CISA is responsible for protecting the Nation's critical infrastructure from physical and cyber threats. This mission requires effective coordination and collaboration from government and private sector organizations. As part of the collaboration efforts, CISA receives requests for CISA employees to give presentations and speeches at various events.

This digital collection of information is necessary to ensure an efficient and timely process to schedule outreach and engagement with CISA stakeholders. This information may be disclosed as generally permitted under 5 U.S.C § 522.

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 Speaker Request Form will be the first point of contact between CISA and the public to initiate CISA speaking engagements. The form will be available on, www.cisa.gov and any member of the public can submit a request for a CISA employee to speak at an event. The form will be used by CISA to track and manage external speaking engagements. The information will be used to schedule and determine the most appropriate CISA speaker based on date, time, location, presentation format, and topic. The form collects information about the event, discussion topics, presentation format, media participation, disclosures, special event guest, and event coordinator information.

Information from the Speaker Request Form regarding the requested speaking engagement, the host organization, the speaking topic, agenda and additional event details will be collected. The requested information helps CISA determine whether the speaker should attend the engagement and/or how CISA should best prepare for the event.

The information is used to determine if the event warrants the time and attention of the invited speaker and what messages and information can be shared on behalf of the Agency with a public or targeted audience.

The CISA Speakers Bureau team will use the information to identify a speaker and route the Speakers Request Form to that person for consideration. The information is then sent to DHS Public Affairs/External Affairs for awareness of CISA speaking engagements.

The CISA Speaker Request Form was previously approved by OMB on July 26, 2022, and is set to expire on July 31, 2025.

This is an extension of an existing information collection.

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. Please include a statement that usability testing was conducted and what the results from testing did for the collection.

The form will be available on www.cisa.gov. The form will be available as a fillable pdf and/or webform, which will be submitted to CISA External Affairs Speakers Bureau. The data collected will be stored in an internal SharePoint site.

CISA conducted usability testing on form to help with verification of the burden hours and to verify the ease of use. The usability testing participants confirmed the accuracy of the burden hours and had no difficulty traversing through the document. As such, CISA made no changes to the form.

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.

A search of reginfo.gov revealed other Speaker Request Forms used by other Agencies; however, the OMB approval on these forms were no longer current. Therefore, this information is not collected in any form and is not duplicated elsewhere.

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.

This information collection does not have an impact on 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.

Without collecting the data from the Speakers Request Form, CISA would not have an effective and efficient mechanism to allow the public to request CISA leadership and employees' participation at speaking engagements, events, and conferences. The data collected on the form allows CISA to manage incoming requests and collect data relevant to the events.

There will be additional workload burden to staff to continue to use a manual process vs. a digital one. The Speakers Bureau process will lack the efficiency and visibility to CISA staff that an automated system offers. This automated, digitized process will help ensure effective engagement and information sharing between CISA and our stakeholders.

- 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.

The special circumstances contained in item 7a of the Supporting Statement are not applicable to this information collection.

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

The special circumstances contained in item 7b of the Supporting Statement are not applicable to this information collection.

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

The special circumstances contained in item 7c of the Supporting Statement are not applicable to this information collection.

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

The special circumstances contained in item 7d of the Supporting Statement are not applicable to this information collection.

(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.

The special circumstances contained in item 7e of the Supporting Statement are not applicable to this information collection.

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

The special circumstances contained in item 7f of the Supporting Statement are not applicable to this information collection.

(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.

The special circumstances contained in item 7g of the Supporting Statement are not applicable to this information collection.

(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.

The special circumstances contained in item 7h of the Supporting Statement are not applicable to this information collection.

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
60-Day Federal Register Notice:	5/29/2025	90	102	22749- 22750	0
30-Day Federal Register Notice	7/29/2025	90	143	35710- 35711	0

A 60-day notice for comments was published in the Federal Register on 5/29/2025. 0 comments were received related to the 60-day notice.

A 30-day notice for comments was published in the Federal Register on 7/39/2025. 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. 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 a 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.

CISA estimates that between 1,000 and 1,300 speaker requests will be submitted per year, and that each request will take between 5 and 15 minutes to complete. For the purposes of this collection, CISA uses the high end of the respondent and time ranges to estimate a total annual burden of 325 hours (1,300 responses x .25 hours per response). To estimate the cost of this collection, the Agency multiplies the estimated annual hour burden by the loaded wage rate for all occupations within the United States, based on Bureau of Labor Statistics (BLS) data. As of January 2024, the U.S. BLS reported that real average hourly earnings in-

creased by 1.4% from January 2023 to January 2024. However, the BLS does not provide a specific mean hourly wage for all occupations for the entire year of 2024, therefore; the most current wage data is BLS's National Occupational Employment and Wage Estimate from May 2023. According to the most recent data in BLS, the mean hourly wage for all occupations is \$31.48. To account for benefits and other compensation, this wage was multiplied by 1.4479, to produce a loaded hourly wage of \$45.58. Multiplying the total annual hour burden (325) by this loaded hourly wage (\$45.58) provides an estimated annual cost of \$14,813.60.

Form Name & Number	Number of Respon- dents	Number of Re- sponses per Re- spondent	Average Burden per Response (in hours)	Total An- nual Bur- den (in hours)	Loaded Average Hourly Wage Rate	Total Annual Respondent Cost
CISA Speaker Request Form	1,300	1	0.25 (15 minutes)	325	\$45.58	\$14,813.60

NOTES ON HOUR BURDEN:

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 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.

Each speaker request submitted will be reviewed by a CISA employee. The time burden associated with this review represents the government cost for this collection. To estimate the cost of government time, we assume that each request will take 15 minutes to review by a GS 12 Step 1 employee. The annual rate for a GS 12 Step 1 in the Washington DC area is \$48.59¹, which is multiplied by the load factor of 1.6919 The load factor of 1.6919 is estimated by dividing average total compensation for all levels of education in Table 4 (\$64.80) by average wages for all

^{*} The above Average Hourly Wage Rate is the <u>May 2023 Bureau of Labor Statistics</u> average wage for "All Occupations" of \$31.48 times the wage rate benefit multiplier of 1.4479 (to account for fringe benefits) equaling \$45.58. The selection of "All Occupations" (for example) was chosen as the expected respondents for this collection could be expected to be from any occupation. The load factor is estimated by dividing Total Compensation (\$46.84) by Salaries and Wages (\$32.35) = 1.4479, based on the <u>December 2024 Bureau of Labor Statistics Employer Costs for Employee Compensation News Release</u> Table 1: Employer Cost for Employee Compensation by ownership.

¹https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/DCB_h.aspx

levels of education in Table 2 (\$38.30), from the Congressional Budget Office publication Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015.² The loaded compensation rate of the GS 12 Step 1 employee is \$82.21. Multiplying the annual burden by the compensation rate results in a burden of \$26,718.16 (325 hours x \$82.21.

		Number of	Number of	Average Bur-	Total Annual	Average	Total Annual
		Respondents	Responses	den per Re-	Burden (in	Hourly Wage	Respondent
			per Respon- dent	sponse (in hours)	hours	Rate	Cost
Ī	GS 12 Step 1	1,300	1	0.25	325	\$82.21	\$26,718.16

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.

There were no changes to the information collection instrument. The adjustments reported in Items 13 and 14 are due to a change in the GS grade level of the employee performing these duties, as well as annual wage increases resulting from the General Schedule (GS) increase and locality pay adjustments.

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.

CISA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

CISA will display the expiration date for OMB 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.

CISA does not request an exception to the certification of this information collection.

² <u>Congressional Budget Office. Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015.</u>
<u>April 2017. https://www.cbo.gov/publication/52637</u>