Andrew G. Huff, Ph.D., M.S. **October 20, 2026**
Risk Factor Research, LLC, Michigan, USA
contact@andrewhuff.com

National Institute of Standards and Technology (NIST), CHIPS Program Office, U.S. Department of Commerce
OMB Control Number 0693-0097 (no regulations.gov docket)
Federal Register document 2026-17760; 91 FR 55843 (August 31, 2026)
Submitted by email to PRANIST@nist.gov, subject line: Streamlined Supply Chain Information Collection Request OMB Control Number 0693-0097; comments due October 30, 2026

Re: Agency Information Collection Activities; Comment Request; Streamlined Supply Chain Information Collection Request; OMB Control Number 0693-0097; FR Doc. 2026-17760 (91 FR 55843, August 31, 2026)

I write in my individual capacity to comment on the proposed extension of the Streamlined Supply Chain Information Collection Request, OMB Control Number 0693-0097, which supports applications under Funding Opportunity 2023-NIST-CHIPS-SMME-01 for commercial facilities producing semiconductor materials and manufacturing equipment. I am an epidemiologist and security engineer. I previously served as a Senior Member of Technical Staff at Sandia National Laboratories, where I did national security modeling of food systems, and I have led or co-led federally funded programs across roughly ten agencies, so I know what it costs an applicant to assemble the financial, technical, environmental, and workforce record this collection asks for. My comments follow the four heads the Paperwork Reduction Act assigns to this notice, with a short section, labeled as such, on handling of the supply-chain data collected.

Summary of recommendations

1. Reconcile the notice title with its text. The title describes a submission to OMB for review and approval; the body states that the notice allows 60 days of public comment before the collection is submitted to OMB. A reader who trusts the title may look for a comment link on reginfo.gov that may not yet exist. One clarifying sentence in the 30-day notice, and consistent titling going forward, would fix this.

2. State burden separately for the Concept Plan and the Full Application rather than as a single blended figure of 42 hours per response across 210 respondents, and publish the assumptions behind each.

3. Reconcile the $873,032 figure. The notice labels it the estimated total annual cost to the public; the approved 2023 inventory record lists cost burden to the public as $0 and annual cost to the Federal Government as $873,032. State which it is, and if it is a public cost, state the hourly rate and labor categories used.

4. State which data elements changed, if any, between the 2023 approval and this extension, so that the public can evaluate necessity and practical utility element by element rather than in the abstract.

5. Minimize burden through technology by allowing applicants to reuse validated submissions across stages, by accepting structured financial data in a published machine-readable format, and by stating response-time targets so applicants can plan.

6. Beyond the PRA: bind provenance and validation status to every submitted value, publish the handling rules for confidential business information submitted through the collection, and confirm that the collection gathers nothing beyond what award evaluation requires.

The case for the collection as proposed

The strongest argument for extending this collection as it stands is that it works. The CHIPS Incentives Program is authorized by Title XCIX of the Fiscal Year 2021 National Defense Authorization Act, as amended by the CHIPS Act of 2022, and the program cannot evaluate an application to construct, expand, or modernize a semiconductor materials or equipment facility without the project, financial, environmental, and workforce information the abstract describes. Respondents are for-profit businesses seeking federal funding, the obligation falls only on those who choose to apply, and OMB approved the collection in November 2023 after public comment. An extension of an active, approved collection serving a statutory program is exactly the case the Paperwork Reduction Act treats as routine. My comments do not argue against the collection. They argue that the notice should let the public check the agency's arithmetic and that the agency should be explicit about how it protects what it collects.

(a) Necessity and practical utility

The collection is necessary. Section 4652 of Title 15 authorizes financial assistance for semiconductor facilities, and no award can be made responsibly without the information the abstract describes. Practical utility, however, is evaluated element by element, not at the level of the whole instrument. The notice describes the categories collected (project descriptions and timelines, justifications for incentives, applicant financial data, environmental and workforce information), and I did not find in the notice a statement of whether any element was added, removed, or revised since the 2023 approval. For an extension, that fact defines what is actually being renewed. I recommend that the 30-day notice or the supporting statement include a short change log: which elements are unchanged, which are new, and for each new element, the award-evaluation decision it informs. An element that informs no decision has no practical utility and should be dropped; one that does should be kept and defended on that basis.

(b) Accuracy of the burden estimate

The estimate is 210 respondents at 42 hours each, for 8,820 annual burden hours and an estimated total annual cost to the public of $873,032. The hours arithmetic is internally consistent; the problem is what the single blended figure hides. The approved inventory record lists two instruments, a Concept Plan and a Full Application. A concept plan that gives a project summary and a full application that includes financial data, environmental documentation, and workforce information cannot plausibly take the same number of hours. The blended 42-hour figure is either an average across very different instruments, which should be stated with its weights, or an estimate for one instrument applied to both, which should be corrected. I recommend separate response counts, hours per response, and cost per response for each instrument, with the underlying assumptions published.

On the dollar figure, either the label or the methodology changed between the 2023 inventory record and this notice, and the 30-day notice should say which. If $873,032 is a public cost, dividing it by 8,820 burden hours implies about $99 per hour, a reasonable fully loaded rate for the mix of finance, legal, engineering, and executive time a capital-project application consumes, but the notice does not say that this is how the number was derived. I recommend stating the labor categories, hourly rates, and any non-labor costs, such as third-party environmental or financial review, that make up the total. From my experience assembling federal program applications of comparable scope, 42 hours is at the low end for a full application that includes financial data and environmental information. If the agency has actual completion data from applicants since 2023, that data is the most probative evidence available and should replace the original assumptions.

(c) Enhancing quality, utility, and clarity

Quality depends on respondents knowing what counts as a complete and valid answer. For each data element, the instrument should state the acceptable form of the response, the validation the agency will apply, and what happens when a value fails validation. This serves the applicant, who can correct a submission before it is rejected, and the agency, whose reviewers then receive data of known quality. In my work building surveillance and risk-modeling systems, a major driver of downstream analytic cost was data whose validation status was unknown at the point of entry; every value had to be re-checked because nobody could tell which values had already been checked. Carrying a validation flag with each value costs little and removes that burden from both sides.

Clarity would also improve if the notice gave applicants a stated response-time target for each stage. An applicant who knows when to expect a decision can schedule the staff time the collection consumes rather than holding it in reserve, which lowers the real burden without changing the instrument.

(d) Minimizing burden, including through information technology

The collection is electronic, which is the right baseline. Three further steps would reduce burden measurably. First, allow validated information submitted at the Concept Plan stage to carry forward into the Full Application without re-entry, so that an applicant supplies each fact once. Second, publish a machine-readable schema for the financial and project data so that applicants can export from their own accounting and project-management systems rather than retyping, and so that the agency receives structured data it can validate automatically. Third, treat interviews or email, which the notice lists as alternative methods, only as supplements to the electronic record and never as the system of record, since unstructured channels must later be reconciled with the application at the agency's expense. Each step should be reported in the next supporting statement with a before-and-after hours estimate so that the reduction is measured rather than asserted.

Beyond the PRA: handling of supply-chain data

This section is outside the four statutory heads and is labeled as such. The collection gathers, from a small number of firms, detailed information about domestic capacity to produce polysilicon, photoresists, sputtering targets, deposition and etching tools, lithography and inspection systems, and related inputs. Aggregated, that information describes the structure and

weak points of a national supply chain the CHIPS Act exists to strengthen. The inventory record states that the collection contains personally identifiable information, and the notice warns commenters not to submit confidential business information, which signals that the agency understands the sensitivity involved.

I recommend three commitments, stated publicly. First, data minimization: collect only what award evaluation requires, and treat each new internal recipient or secondary use of applicant data as an expansion of the attack surface that must be justified by a stated purpose and a measured benefit. Second, provenance and validation: bind to every stored value its source, the date received, and its validation status, so that a reviewer, an auditor, or an incident responder can tell a verified figure from an applicant assertion and can identify altered records. Third, information-flow control: state where applicant data is stored, who can read it, how confidential business information is segregated and protected under the Trade Secrets Act and Exemption 4 of the Freedom of Information Act, and how long it is retained after an award decision. NIST SP 800-161 Revision 1 on cybersecurity supply chain risk management, and the access-control and audit families of SP 800-53 Revision 5, already supply the vocabulary for these commitments. I made the same point about provenance and flow control in a separate comment on NIST's National Vulnerability Database modernization, and it applies with equal force here: a record of the nation's semiconductor supply base deserves the same handling discipline the agency's own guidance describes.

Scope and confidence

I have not reviewed the supporting statement filed with OMB or the instruments themselves, and I have not commented on the merits of the funding opportunity or any specific award. My confidence that the blended burden figure obscures a material difference between the two instruments is high, 80 to 90 out of 100, because the instruments differ in kind. My confidence that the $873,032 label is inconsistent between the notice and the 2023 inventory record is high, 85 to 95; which document is correct I cannot say. My confidence that the 42-hour estimate understates a full application is moderate, 60 to 75, and rests on experience with comparable federal applications rather than on applicant data from this program, which the agency holds and I do not. The data-handling recommendations rest on established NIST guidance and I hold them with high confidence.

Disclosure: I have no financial interest in any vendor or contract involving this program, and I was not compensated for this comment.

Thank you for the opportunity to comment.

Respectfully,

Andrew G. Huff, Ph.D., M.S.
Risk Factor Research, LLC

References

1. National Institute of Standards and Technology, Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Streamlined Supply Chain Information Collection Request, 91 FR 55843,

August 31, 2026, https://www.federalregister.gov/documents/full_text/html/2026/08/31/2026-17760.html

2. Office of Information and Regulatory Affairs, ICR Reference No. 202310-0693-001, OMB Control Number 0693-0097, CHIPS Streamlined Supply Chain Information Collection Request, concluded November 29, 2023, https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202310-0693-001

3. Paperwork Reduction Act of 1995, 44 U.S.C. 3506(c)(2)(A), https://www.law.cornell.edu/uscode/text/44/3506

4. Office of Management and Budget, 5 CFR 1320.8, Agency collection of information responsibilities (Part 1320, Controlling Paperwork Burdens on the Public), https://www.law.cornell.edu/cfr/text/5/1320.8

5. 15 U.S.C. 4652, Semiconductor incentives, https://www.law.cornell.edu/uscode/text/15/4652

6. Trade Secrets Act, 18 U.S.C. 1905, https://www.law.cornell.edu/uscode/text/18/1905

7. Freedom of Information Act, 5 U.S.C. 552(b)(4), https://www.law.cornell.edu/uscode/text/5/552

8. National Institute of Standards and Technology, SP 800-161 Rev. 1, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations, May 2022, https://doi.org/10.6028/NIST.SP.800-161r1

9. National Institute of Standards and Technology, SP 800-53 Rev. 5, Security and Privacy Controls for Information Systems and Organizations, September 2020, https://doi.org/10.6028/NIST.SP.800-53r5