

Supporting Statement for Paperwork Reduction Act Submissions

Title: ChemLock Program

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.

Congress established the Cybersecurity and Infrastructure Security Agency (CISA) in the Cybersecurity and Infrastructure Security Act of 2018, Pub. L. 115-278 (2018). As part of CISA's responsibilities, Congress authorized CISA to provide analyses, expertise, and other assistance to critical infrastructure owners and operators upon request. 6 U.S.C. § 652(c)(5).

CISA serves as Sector Risk Management Agency (SRMA) for the chemical sector. CISA has established ChemLock, which is a voluntary program for facilities that possess dangerous chemicals. This information collection request (ICR) consolidates and clarifies CISA collection of information in support of ChemLock. While some ChemLock services are currently available leveraging other approved information collections, this ICR when approved, will allow for an additional ChemLock service that will provide a risk assessment service.

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 information collected will support CISA's Office of Chemical Security in providing resources tailored to the specific facilities requesting services under the ChemLock program.

Three instruments are in this collection:

- ChemLock Program Request for Services
- ChemLock Service Registration and Preparation
- ChemLock Service Feedback

ChemLock Program Request for Services

This instrument collects basic contact information from individuals requesting a ChemLock service such as: (a) security consultations; (b) technical consultations, (c) onsite assessments and assistance, (d) exercises and drills, (e) training courses, (f) access to other tailored resources, and (g) risk assessments. In addition, the instrument will collect facility identifying information, facility description information, and information about the chemicals present at the facility.

ChemLock Service Registration and Preparation

This instrument collected information to enable the ChemLock services which need additional information to be performed. The ChemLock services which need additional information to be performed are security consultations, onsite assessments and assistance, and risk assessments.

The instruments will collect security related information such as existing site security plans and previously performed assessments. In addition, the instrument may collect information about critical cyber and physical detection, delay, and response security measures.

In support of the risk assessment ChemLock service the instrument will collect information similar to the Top-Screen instrument under information collection 1670-0007 such as:

- Name(s) of dangerous chemical(s)
- Chemical Abstracts Service (CAS) Registry Number(s) of dangerous chemical(s)
- Quantity(ies) of dangerous chemical(s)
- Concentration of dangerous chemical
- Storage vessel(s) for dangerous chemical(s)
- Safety Data Sheet(s) (SDS) for dangerous chemical(s)
- Process for use, sale, storage, handling, shipping, receipt, and disposal of dangerous chemical(s) (as applicable)
- Other relevant information

ChemLock Service Feedback Collection

This instrument will collect information related to feedback about ChemLock related services such as: which ChemLock service was provided and when, program outcomes, satisfaction, and performance of the staff involved in providing the ChemLock service.

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.

This information will primarily be collected electronically. CISA officials may ask clarifying questions verbally.

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.

The proposed ICR and its instruments will consolidate and clarify CISA's collection of information in support of ChemLock. For example, the information collected under other approved ICs such as 1670-0019 and 1670-0027. Consolidating the information used to collect information will not result in duplication because the intent of the information collections is

different. Consolidating the information collections will allow for better quality and more consistent data about the total burden of the ChemLock program rather than piecing data together from multiple information collections.

After the current information collections are approved, ChemLock burden estimates will be removed from CISA’s current information collections when those information collections are revised.

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.

No unique methods will be used to minimize the burden to small businesses.

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.

If the collection of information is not conducted, then CISA will be unable to provide ChemLock related services which provides scalable, tailored options for facilities that want to enhance their chemical security posture.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances with this 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:	December 31, 2024	89	250	107154- 107155	No comments received
30-Day	June 2, 2026	91	105	32993-	0

<i>Federal Register Notice</i>				32994	
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A 60-day notice for comments was published in the Federal Register on Tuesday, December 31, 2024.¹ No comments were received.

A 30-day notice for comments was published in the Federal Register on Tuesday, June 2, 2026. <https://www.federalregister.gov/documents/2026/06/02/2026-10959>

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

No payment or gift of any kind is provided to any respondents.

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.

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.

The instruments described in this collection do not request any information of a personally 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.

To estimate the average annual reporting burden associated with each instrument, CISA multiplies the number of respondents by the annual number of responses per respondent and the estimated time needed to respond. The number of responses per respondent and the time burden estimates vary by instrument and are summarized in the table below, along with the total annual reporting burden for each instrument.

¹ The 60-day Federal Register Notice published at 89 FR 107154 may be viewed at <https://www.federalregister.gov/d/2024-31370>.

As shown in the table below, the estimated annual labor costs associated with reporting is \$107,971.20.²

Instrument Name	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
Request for Services	450	1	0.25	112.5	\$96.34	\$10,838.06
Service Registration and Preparation	300	1	3.17	952	\$96.34	\$91,714.10
Service Feedback	225	1	0.25	56.25	\$96.34	\$5,419.03
Total	975			1,120.75		\$107,971.20

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.)

No costs are anticipated.

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.

The estimated annual cost to the Federal government is \$121,466.89. This estimate is based on one CISA employee at GS 13 Step 5 who will either collect the ChemLock program submissions or review the information collected. CISA estimates that the CISA employee will take the same amount of time reviewing the information collected as the facility did submitting the information.

² The Average Hourly Wage Rate is the [May 2023 National Occupational Employment and Wage Estimates](#) average wage for “Management Occupations” of \$66.23 times the wage rate benefit multiplier of 1.4546 (to account for fringe benefits) equaling \$96.34. The load factor is estimated by dividing Total Compensation (\$46.14) by Salaries and Wages (\$31.72) = 1.4546, based on the [June 2024 Bureau of Labor Statistics Employer Costs for Employee Compensation News Release Table 2: Civilian workers by occupational and industry group](#).

Using the FY24 (WASHINGTON-BALTIMORE-NORTHERN VIRGINIA, DC-MD-VA-WV-PA locality) GS pay scale, the fully-loaded wage rate for a GS13, Step 5 in the National Capital Region is \$108.38 (\$64.06 hourly wage rate x 1.6919 benefit multiplier = \$108.38 fully-loaded wage rate).³ 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 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 2015.⁴

The CISA employee will spend 1,120.75 hours total reviewing the instruments, at \$108.38 hourly for a total cost of \$121,466.89.

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 new information collection request, so there is no change to report.

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.

No plans exist for the use of statistical analysis or to publish this information.

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

The expiration date will be displayed in the instruments.

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

No exceptions have been requested.

³ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx

⁴ CBO. Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015. April 2017. <https://www.cbo.gov/publication/52637>