

INFORMATION COLLECTION SUPPORTING STATEMENT

BASELINE ASSESSMENT FOR SECURITY ENHANCEMENT (BASE) PROGRAM

1652-0062

- 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. (Annotate the CFR parts/sections affected).**

The Transportation Security Administration (TSA) has broad authority with respect to transportation security that is supported with specific powers related to the development and enforcement of regulations, security directives (SDs), security plans, and other requirements. For example, under the Aviation and Transportation Security Act (ATSA) and delegated authority from the Secretary of Homeland Security, TSA has broad responsibility and authority for “security in all modes of transportation ... including security responsibilities ... over modes of transportation that are exercised by the Department of Transportation.”² Consistent with this authority, TSA is the federal agency responsible for “assess[ing] the security of each surface transportation mode and evaluat[ing] the effectiveness and efficiency of current Federal Government surface transportation security initiatives.” EO 13416, section 3(a) (Dec. 5, 2006). While many surface transportation entities have security and emergency response plans or protocols in place, no single database exists, nor is there a consistent approach to evaluating the extent to which security programs are in place across the surface transportation domain.

TSA has met this assessment requirement through the Baseline Assessment for Security Enhancement (BASE) program, which provides a domain awareness, prevention, and protection program in support of TSA’s and the Department of Homeland Security’s (DHS) missions. TSA initially developed the BASE program for public transportation systems to evaluate the status of security and emergency response programs throughout the nation and, based on the program’s success, expanded it into the highway transportation domain.³ The BASE is a completely voluntary program, with no penalties for declining to participate or for not having any voluntary security elements in place. Specifically, a BASE review assesses the security measures of a transportation system and gathers data used by TSA to address its responsibilities, such as evaluating “effectiveness and efficiency of current Federal

For per diem calculation, the time per visit is converted into number of days by dividing the given number of hours by 8 hours working day. E.g. Time per visit, 1.46 days = 11.7 hours ÷ 8 hours.

For 2016, GSA estimates a national average per diem rate of \$140. For costs related to paperwork, TSIs’ fully loaded average hourly wage of \$30.79 is used.

The total annual cost is calculated using time per visit (in days) for per diem and time per visits (in hours) for paperwork.

² 49 U.S.C. § 114(d).

³ Previously, for highway transportation, TSA met the assessment requirement through Corporate Security Reviews (CSRs) with organizations engaged in transportation by motor vehicles and those that maintain or operate key physical assets within the highway transportation community (DISCONTINUED TSA OMB control number 1652-0036). TSA consolidated these assessment programs within surface modes of transportation under the BASE program, TSA OMB control number 1652-0062.

Government surface transportation security initiatives” and developing modal specific annexes to the Transportation Systems Sector Specific Plan that include “an identification of existing security guidelines and requirements and any security gaps....” EO 13416, Sec. 3(c) (i).

On August 24, 2015, TSA received approval from OMB for the BASE collections under TSA OMB control number 1652-0062. Following this approval, legislative action occurred that requires changes. Section 7 of Pub. L. 114-50, 129 Stat. 490 (Sept. 24, 2015), known as the “Gerardo Hernandez Airport Security Act of 2015” (hereinafter referred to as the “Gerardo Act”), requires TSA to gather specific information from passenger transportation agencies and providers with high-risk facilities, regarding incident response plans for active shooters, acts of terrorism, or other security-related incidents that target passengers and to identify. TSA is also required to disseminate best practices for security incident planning, management, and training and to establish a mechanism through which to share such practices with passenger transportation agencies nationwide. Section 7 of the Gerardo Act also requires, no later than 180 days after enactment, that TSA report to Congress on the findings from its outreach. These findings are to include an analysis of the level of preparedness for responding to security incidents. While TSA currently maintains most of the data needed to comply with the Gerardo Act,⁴ TSA has determined it is necessary to collect additional data related to surface transportation systems’ incident response plans for active shooters. In light of the statutory reporting deadline, TSA is now seeking emergency clearance to include additional questions during its BASE reviews. Without this approval, TSA will be unable to collect the required information and report to Congress within the time frame specified in section 7 of the Gerardo Act.

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.*

TSA’s Surface Transportation Security Inspectors (TSIs) are trained to conduct BASE reviews during site visits with security and operating officials of transportation systems. These TSIs capture and document relevant information using a standardized electronic checklist. Advance coordination and planning ensures the efficiency and effectiveness of the assessment process. Stakeholders may also obtain a checklist in advance from TSA and conduct self-assessments of their security readiness.

A BASE review evaluates a surface transportation system’s security program components using a two-phased approach: (1) field collection of information, and (2) analysis/evaluation

⁴ Sections 3 and 4 of the Gerardo Act require TSA to conduct outreach to airports at which TSA performs or oversees the implementation and performance of security measures; provide technical assistance as necessary to verify the airports have individualized working plans for responding to security incidents inside the perimeter of the airport, including active shooters, acts of terrorism, and incidents that target passenger-screening checkpoints; disseminate best practices; and report to Congress no later than 180 days after the date of enactment on the findings from its outreach, including an analysis of the level of preparedness of such airports to respond to security incidents. However, this emergency ICR does not cover sections 3 and 4 of the Act because TSA is able to collect the necessary information by reviewing each airport operator’s airport security program, as required under 49 CFR Part 1542.

of collected information. The information collected by TSA through BASE reviews strengthens the security of surface transportation systems by supporting security program development (including grant programs), and the analysis/evaluation provides a consistent road map for stakeholders to address security and emergency program vulnerabilities. TSA provides all surface transportation systems that undergo a BASE review with a comprehensive report of results that can be used to identify and prioritize vulnerabilities to enhance security. The report includes a score derived from the checklist, which is category and question-based, and both are weighted. Each category is then scored and the BASE score is an average of all categories.

Specifically, the information collected will be used as follows:

1. To develop a baseline understanding of a transportation system's security and emergency management processes, procedures, policies, programs, and activities against security requirements and recommended security practices published by TSA and the Department of Transportation (DOT).
2. To enhance a transportation system's overall security posture through collaborative review and discussion of existing security activities, identification of areas of potential weakness or vulnerability, and development of remedial recommendations and courses of action.
3. To identify programs and protocols implemented by a transportation system that represent an "effective" or "smart" security practice warranting the sharing of information across the relevant modal community to foster general enhancement of security.
4. To inform TSA's development of security strategies, priorities and programs for the most effective application of available resources. In mass transit, the BASE is a supporting element for funding distributed under the Transit Security Grant Program.

Since information in completed assessments constitutes "Sensitive Security Information" (SSI) pursuant to 49 U.S.C § 114(r) and 49 CFR parts 15 and 1520, TSA designates and marks the data as SSI and protects it in accordance with the requirements set forth in the law and regulations. Transportation systems identifying vulnerabilities in a BASE self-assessment may constitute SSI and, if so, should be protected and marked according to 49 CFR parts 15 and 1520.

As part of the data collection requirements under the Act, TSA is requesting to add seven (7) questions to the mass transit/passenger rail transportation portion and five (5) questions to the highway mode portion of the BASE. The questions relate to these entities' incident response plans for active shooters, information about which TSA does not currently collect. TSA has determined it is necessary to collect this information in order to fulfill the requirements of section 7 of the Gerardo Act. The impact to the stakeholders will be minimal, is consistent with the other purposes of the BASE and uses of information, including allowing TSA to assess and share best practices with the same stakeholder community.

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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]***

The majority of the information collected relevant to a BASE review is through the site visit. During BASE reviews, inspectors capture and document relevant information through electronic means, utilizing an electronic checklist, in compliance with GPEA.

4. ***Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.***

TSA actively monitors information collected by our Federal partners but has found no other collection that can meet the needs of the BASE program. TSA is sensitive to the burden on the industry from complying with requests for information and has taken appropriate steps to avoid overlap where possible. For example, development of the questions used in the BASE programs received input from DOT and its modal administrations as well as industry partners, through the Office of Security Policy and Industry Engagement's Peer Advisory Group (PAG).

While TSA is the lead federal agency for all modes of transportation, TSA previously decided to limit the Highway BASE to non-hazardous material carriers and shippers in order to avoid duplication with the Federal Motor Carrier Safety Administration (FMCSA) assessments for compliance with requirements of the Pipeline and Hazardous Materials Administration (PHMSA).

In addition, TSA, the Department of Transportation (DOT) and the Federal Transit Administration (FTA), have had a long-standing partnership to advance transportation counter-terrorism security priorities for our Nation, with TSA as the lead sector-specific agency for Public Transportation security-related matters. FTA focuses on mandatory safety standards rather than on security-related guidelines. At the present time, the FTA is moving away from security guidelines in favor of mandatory safety requirements.

Further, to help delineate clear lines of authority and responsibility and promote communications, efficiency, and non-duplication of effort through cooperation and collaboration, TSA and FTA are finalizing an update to the Annex to the Memorandum of Understanding between the Department of Homeland Security and the Department of Transportation. TSA is working with FTA to update the Annex.

With respect to this emergency request, while TSA has explored other means to obtain the data required under Section 7 of the Gerardo Act, TSA has determined the information is not available elsewhere and no other current TSA approved collections can be used.

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

Although TSA plans to collect information from businesses of all sizes, there is minimal potential burden to small businesses or other small entities.

6. ***Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.***

If this collection is not conducted, TSA will be unable to assess current security practices in the public transportation/passenger rail and highway transportation sectors, and will, therefore, be unable to fully exercise its oversight authority as provided for under ATSA and delegated authority from the Secretary of Homeland Security. If the information collection is conducted less frequently, TSA's ability to compare data collected at different sites will be diminished. Additionally, TSA will be unable to fulfill the best practices requirements, nor comply with the data collection and reporting requirements of section 7 of the Gerardo Act within the statutory time frame.

In general, the BASE program provides TSA with real-time information on current security practices within the surface transportation sector. This information allows TSA to adapt programs to the changing threat, while incorporating an understanding of the improvements owners/operators make in their security posture, whereas without this information, the ability of TSA to perform its security mission would be severely hindered. Additionally, the relationships these face-to-face contacts foster are critical to the Federal Government's ability to quickly reach out to transportation systems to respond to any incidents.

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

TSA will conduct this collection in a manner consistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

- 8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) 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.**

TSA is in continuous dialogue with transportation system stakeholders. TSA is currently seeking an Emergency Approval of this collection. Upon approval of the Emergency Request, TSA will seek public comment on the collection following the normal clearance process providing a 60 and 30 Day commenting period.

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

TSA will not provide payment or gifts to respondents.

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

While TSA does not offer any assurance of confidentiality, portions of the information provided by respondents and the resulting BASE reviews are designated Sensitive Security Information (SSI), as determined by the TSA SSI Office, and are handled in accordance with in 49 CFR parts 15 and 1520.

- 11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

TSA does not ask questions of a private or sensitive nature.

12. Provide estimates of hour and cost burden of the collection of information.

TSA developed the BASE program for surface modes of transportation to evaluate the status of security and emergency response programs throughout the nation. The BASE collection covers Mass Transit and Passenger Rail (MTPR) and Highway/Motor Carrier transportation systems. Following the Gerardo Act, TSA has determined that it is necessary to collect additional data related to surface transportation systems' incident response plans for active shooters and has developed additional Active Shooter questions. Both the standard BASE collections and the additional Active Shooter questions are conducted by TSA's Surface Transportation Security Inspectors (TSIs) during site visits with security and operating officials of transportation systems. TSA provides estimates of the hour burden costs due to these information collection activities.

Based on the data provided by TSA Office of Security Operations, Surface Compliance Branch, TSA estimates that the average annual number of respondents to this information collection process is 290. This results in an average of 580 annual responses. TSA also estimates that the total annual hour burden incurred is 1,980 (1,908 for standard BASE collections + 72 for additional Active Shooter questions). The total annual hour burden cost of this information collection is estimated to be \$159,528 (\$154,032 for standard Base collections + \$5,496 for additional Active Shooter questions).

Calculations:

The average annual number of respondents is calculated by summing the number of MTPR and Highway entities responding to both the standard BASE collections and the additional Active Shooter questions.

$$\begin{aligned} \text{Average number of respondents} &= 140 \text{ MTPR entities} + 150 \text{ Highway entities} \\ &= 290 \text{ entities per year} \end{aligned}$$

The average annual number of responses is calculated by summing the number of responses by MTPR and Highway entities to both the standard BASE collections and the additional Active Shooter questions.

$$\begin{aligned} \text{Average number of responses} &= (140 \text{ MTPR entities} \times 2 \text{ responses}) + (150 \text{ Highway} \\ &\quad \text{entities} \times 2 \text{ responses}) \\ &= 580 \text{ per year} \end{aligned}$$

TSIs are accompanied by a Corporate Security Coordinator or Security Manager, or by their subordinates in the Safety or Security Office during their site visits. Since the wage rates for these personnel are not readily available, TSA uses the fully loaded average hourly wage rates of General and Operations Managers or Administrative Service Managers in the transportation sector drawn from the BLS database. Accordingly, TSA uses the fully loaded

average hourly wage rate of \$83.00 for MTPR entities⁵ and \$66.99 for Highway entities.⁶ To estimate the cost associated with each time burden, TSA multiplies these fully loaded average hourly wage rates by their corresponding time burdens.

(a) Standard BASE Collections

The standard BASE collection is an inspector-led process with stakeholders input for completion of the questionnaire. Two TSIs conduct each site visit accompanied by the appropriate personnel in the MTPR and Highway modes. TSA estimates that the contact time with industry personnel for completion of the standard BASE collection is 11.7 hours for MTPR and 1.8 hours for Highway entities.

Hour burden (MTPR) = 140 responses x 11.7 hours = 1,638 hours per year.

Hour burden (Highway) = 150 responses x 1.8 hours = 270 hours per year.

Hour burden cost (MTPR) = 1,638 hours per year x \$83.00 = \$135,954 per year.

Hour burden cost (Highway) = 270 hours per year x \$66.99 = \$18,087 per year.

Total hour burden due to the standard BASE collections = 1,908 hours per year (1,638 MTPR hours per year + 270 Highway hours per year).

Total hour burden cost due to the standard BASE collections = \$154,041 per year (\$135,954 MTPR per year + \$18,087 Highway per year).

(b) Additional Active Shooter Questions

The questionnaires for Active Shooter involve 7 additional questions for MTPR entities and 5 additional questions for Highway entities. TSA assumes that to complete the Active Shooter questions MTPR entities take approximately 0.3 hours and Highway entities take approximately 0.2 hours.

⁵This wage rate is obtained by taking the average of the fully loaded hourly wage rates of the General and Operations Managers and Administrative Service Managers. For MTPR entities, the fully loaded hourly average wage rate \$83.00 = [(\$95.16 for General and Operations Managers) + (\$70.83 for Administrative Service Managers)] ÷ 2. Note that each of these fully loaded hourly average wage rates are obtained by multiplying the average hourly wage by the compensation factor. Fully loaded hourly average wage rate \$95.16 = hourly average wage \$61.95 x compensation factor 1.536. Fully loaded hourly average wage rate \$70.83 = hourly average wage \$46.11 x compensation factor 1.536.
Source-hourly average wage: BLS, May 2014 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 482100 – Rail Transportation, 11-1021 General and Operations Managers; 11-3011 Administrative Service Manager. http://www.bls.gov/oes/current/naics4_482100.htm. Accessed on Jan. 27, 2016.
Source-compensation factor: BLS Economic News Release March 2015 Employer Costs for Employee Compensation Summary Table 11 for All Full Time Workers Transportation and material moving. 1.536 = \$31.31 in total compensation ÷ \$20.39 in wages and salaries. <http://www.bls.gov/news.release/pdf/eccec.pdf>. Accessed on Jan. 76, 2016.

⁶ Similarly, the fully loaded average hourly wage of \$66.99 for Highway entities is obtained by taking the average of the hourly wage rates of General and Operations Managers and Administrative Service Managers in the various modes of the Highway transportation (NAICS 484000, 485400, 485100, 485200, 485500 and 485900) and multiplying it by the compensation factor 1.536.

Hour burden (MTPR) = 140 responses x 0.3 hours = 42 hours per year.
 Hour burden (Highway) = 150 responses x 0.2 hours = 30 hours per year.

Hour burden cost (MTPR) = 42 hours per year x \$83.00 = \$3,486 per year.
 Hour burden cost (Highway) = 30 hours per year x \$66.99 = \$2,010 per year.

Total hour burden due to the Active Shooter questions = 72 hours per year (42 hours + 30 hours).

Total hour burden cost due to the Active Shooter questions = \$5,496 per year (\$3,486 + \$2,010).

Table 1: Summary of Information Collection Industry Hour Burden Cost

Activities	Average annual Respondents	Annual Number of Occurrences	Average Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost ⁷
	a	b	c = a x b	d	e = c x d	f = e x wage rate
a. Standard BASE Collections						
MTPR entities respond to BASE	140	1	140	11.7	1,638	\$135,954
Highway entities respond to BASE	150	1	150	1.8	270	\$18,087
Sub-Total			290		1,908	\$154,041
b. Additional Active Shooter Questions						
MTPR entities respond to additional questions	140	1	140	0.3	42	\$3,486
Highway entities respond to additional questions	150	1	150	0.2	30	\$2,010
Sub-Total			290		72	\$5,496
Total	290		580		1,980	\$159,537

Note: Totals may not add due to rounding

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no cost burden to the respondents or recordkeepers resulting from the collection of information.

⁷ The hour burden costs are calculated using the fully loaded average hourly wage rates of \$83.00 for MTPR personnel and \$66.99 for Highway personnel for activities in (a) and (b).

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

The standard BASE collections and the additional Active Shooter questions are conducted by TSIs during site visits. The total cost incurred by the federal government is the sum of TSIs' site visits, per diem and paperwork costs. Based on the data provided by the TSA Office of Security Operations, Surface Compliance Branch, TSA estimates that the total annual cost incurred by the federal government is \$355,461 (i.e., \$343,151 for standard BASE collections+ \$12,310 for additional Active Shooter questions).

Calculations:

The cost TSA incurs due to this information collection has three components. The first cost component is related to TSIs contact time with industry personnel to complete both the standard BASE collections and the additional Active Shooter questions during their site visits. The second cost component is related to per diem for TSIs site visits. The third cost component is related to the time spent on paperwork (i.e., compiling the entities responses and preparing reports). To estimate the costs associated with these three cost components, TSA uses the per diem⁸ rate of \$140 (for the second cost component) and the fully loaded average hourly wage of \$30.79 for TSIs⁹ (for the first and third cost components) and multiplies them by the time burden in each cost component.

(a) Standard BASE Collections

Two TSIs conduct each site visit accompanied by the appropriate personnel in the MTPR and Highway modes. TSA estimates that TSIs' contact time to complete the standard BASE collections is 11.7 hours for MTPR and 1.8 hours for Highway entities. TSA also estimates that TSIs' paperwork time for the standard BASE collections is 12 hours for MTPR and 6 hours for Highway entities.

TSIs visit MTPR entities:

Government cost (site visits) = 140 x 11.7 hours x 2 TSIs x \$30.79 = \$100,868 per year.

Government cost (per diem) = 140 x 1.46 days¹⁰ x 2 TSIs x \$140 = \$57,330 per year.

Government cost (paperwork) = 140 x 12 hours x 2 TSIs x \$30.79 = \$103,454 per year.

⁸ U.S. General Service Administration (GSA) estimates a national average per diem rate of \$140 for 2016. Source: <http://www.gsa.gov/portal/content/142071>

⁹ TSA uses the FY15 fully loaded average hourly wage rates (from the Office of Security Operations Business Management Office, BMO) for TSA surface security inspectors. \$30.79 is obtained by taking the average wage rates of the 1801-H and 1801-I band positions.

¹⁰ This is an estimate of work days (11.7 total hours/8) required for TSI visits.

TSIs visit Highway entities:

Government cost (site visits) = $150 \times 1.8 \text{ hours} \times 2 \text{ TSIs} \times \$30.79 = \$16,627$ per year.

Government cost (per diem) = $150 \times 0.225 \text{ days}^{11} \times 2 \text{ TSIs} \times \$140 = \$9,450$ per year.

Government cost (paperwork) = $150 \times 6 \text{ hours} \times 2 \text{ TSIs} \times \$30.79 = \$55,422$ per year.

Total government cost due to the standard BASE collections = \$343,151.

(b) Additional Active Shooter Questions

Two TSIs conduct each site visit accompanied by the appropriate personnel in the MTPR and Highway modes. TSA estimates that TSIs' contact time to complete the additional Active Shooter questions is approximately 0.3 hours for MTPR and approximately 0.2 hours for Highway entities. TSA also estimates that TSIs' paperwork time for the additional Active Shooter questions is approximately 0.3 hours for each of the MTPR and Highway entities.

TSIs visit MTPR entities:

Government cost (site visits) = $140 \times 0.3 \text{ hours} \times 2 \text{ TSIs} \times \$30.79 = \$2,586$ per year.

Government cost (per diem) = $140 \times 0.0375 \text{ days}^{12} \times 2 \text{ TSIs} \times \$140 = \$1,470$ per year.

Government cost (paperwork) = $140 \times 0.3 \text{ hours} \times 2 \text{ TSIs} \times \$30.79 = \$2,586$ per year.

TSIs visit Highway entities:

Government cost (site visits) = $150 \times 0.2 \text{ hours} \times 2 \text{ TSIs} \times \$30.79 = \$1,847$ per year.

Government cost (per diem) = $150 \times 0.025 \text{ days}^{13} \times 2 \text{ TSIs} \times \$140 = \$1,050$ per year.

Government cost (paperwork) = $150 \times 0.3 \text{ hours} \times 2 \text{ TSIs} \times \$30.79 = \$2,771$ per year.

Total government cost due to the additional Active Shooter questions¹⁴ = \$12,310.

¹¹ This is an estimate of work days (1.8 total hours/8) required for TSI visits.

¹² This is an estimate of work days (0.3 total hours/8) required for TSI visits.

¹³ This is an estimate of work days (0.2 total hours/8) required for TSI visits.

¹⁴ Note that totals may not add due to rounding.

Table 2: Summary of Information Collection Government Hour Burden Cost

Activity	Average annual Respondents	Annual Number of Occurrences	Average Annual Responses	Hour Burden per Response	Number of TSIs per Visit	Total Annual Hour Burden	Total Annual Hour Burden Cost
	a	b	$c = a \times b$	d	e	$f = c \times d \times e$	$g = f \times \$30.79$
a. Standard BASE Collections							
TSIs visit MTPR entities	140	1	140	11.7	2	3,276	\$100,868
TSIs visit Highway entities	150	1	150	1.8	2	540	\$16,627
Sub-Total			290			3,816	\$117,495
b. Additional Active Shooter Questions							
TSIs visit MTPRs	140	1	140	0.3	2	84	\$2,586
TSIs visit Highway entities	150	1	150	0.2	2	60	\$1,847
Sub-Total			290			144	\$4,433
Total	290		580			3,960	\$121,928

Note: Totals may not add due to rounding

Table 3: Summary of Information Collection Government Other Costs

¹ For per diem calculation, the time per visit is converted into number of days by dividing the given number of hours by 8 hours working day. E.g. Time per visit, 1.46 days = 11.7 hours ÷ 8 hours.

Activity	Average annual Respondents	Number of Visits	Time per Visit (hours)	Time per Visit (days) ¹	Per Diem/Wage Rate	Number of TSIs per Visit	Total Annual Cost
	a	b	c	d	e	f	$g=a*b*(c \text{ or } d)*e*f$
Standard BASE Collections							
Per Diem: TSIs visit MTPRs	140	1	11.7	1.4625	\$140	2	\$57,330
Per Diem: TSIs visit Highway Entities	150	1	1.8	0.225	\$140	2	\$9,450
Paperwork: TSIs visit MTPRs	140	1	12		\$30.79	2	\$103,454
Paperwork: TSIs visit Highway Entities	150	1	6		\$30.79	2	\$55,422
Sub-Total							\$225,656
Additional Active Shooter Questions							
Per Diem: TSIs visit MTPRs	140	1	0.3	0.0375	\$140	2	\$1,470
Per Diem: TSIs visit Highway Entities	150	1	0.2	0.0025	\$140	2	\$1,050
Paperwork: TSIs visit MTPRs	140	1	0.3		\$30.79	2	\$2,586
Paperwork: TSIs visit Highway Entities	150	1	0.3		\$30.79	2	\$2,771
Sub-Total							\$7,877
Total	290						\$233,533

Note: Totals may not add due to rounding

Table 4: Total Government Cost

Activity:	Standard Base	Active Shooter	Annual Cost
Site Visits	\$117,495	\$4,433	\$121,928
Per Diem & Paperwork	\$225,656	\$7,877	\$233,533
Total Annual Cost	\$343,151	\$12,310	\$355,461

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no program changes from the previously reported information. However, as explained above, TSA is adding a total of 12 questions to the BASE reviews for mass transit/passenger rail transportation and highway motor carriers to comply with section 7 of the Gerardo Act. As explained in Question 12, TSA does not anticipate these additional questions will impact the current hour burden estimates.

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.

TSA will not publish the results of this collection.

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

TSA is not seeking such approval.

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

TSA is not seeking any exceptions to the statement in Item 19.