

INFORMATION COLLECTION SUPPORTING STATEMENT

Transportation Security Officer (TSO) Medical Questionnaire

OMB No. 1652-0032

Exp. 3/31/2016

- 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) is requesting approval to renew this collection of information to comply with Section 111 of the Aviation and Transportation Security Act (ATSA), Pub. L. 107-71 (Nov. 19, 2001, codified at 49 U.S.C. § 44935), which requires TSA to establish qualification standards for the employment of security screening personnel. With approval from the Office of Management and Budget (OMB), TSA currently collects information via a Transportation Security Officer (TSO) Medical Questionnaire and further evaluation forms. See ICR Reference No. 201301-1652-006 (March 29, 2013). During the rapid hiring of TSO's (formerly referred to as Transportation Security Screeners) in 2002 and until summer 2004, TSA used the SF-93, Report of Medical History, as the collection technique to ensure candidates under employment consideration for TSO positions met the qualification standards to successfully perform the functions of the position. With OMB approval, TSA began using the Security Officer Medical Questionnaire (SOMQ) instead of the SF-93 in 2007. See ICR Reference No. 200608-1652-003 (January 4, 2007). TSA has found the SOMQ form, in conjunction with further evaluation (FE) forms as needed, more suitable as those forms collect the information necessary to assist the health care providers in making determinations regarding candidates' medical and physical abilities to successfully perform the job without being overly intrusive.

- 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.***

This collection of information assists the agency in meeting its statutory obligation under ATSA to ensure that no individual serves as a TSO who does not "possess basic aptitudes and physical abilities, including color perception, visual and aural acuity, physical coordination, and motor skills." 49 U.S.C. § 44935(f)(1)(B). Information is collected through a medical questionnaire and further evaluation forms. TSA deems this collection necessary to evaluate a candidate's current and past medical history, including visual and aural acuity, physical coordination, and motor skills to be able to: (a) distinguish on screening equipment monitors the appropriate imaging standard; (b) distinguish each color displayed on every type of screening equipment and explain what each color signifies; (c) hear and respond to the spoken voice and to audible alarms in an active checkpoint environment; (d) perform physical searches by efficiently and thoroughly manipulating and handling baggage containers, and other objects; (e) perform pat-downs or hand-held metal

detector searches of individuals with sufficient dexterity and capacity to thoroughly conduct the procedures over an individual's entire body; and (f) demonstrate a daily fitness for duty without impairment due to illegal drugs, sleep deprivation, medication, or alcohol.

A TSA contractor facilitates receipt and processing of all forms including the further evaluation forms. The variety of further evaluation forms pertain to particular body systems and medical conditions, including cardiac, orthopedic, endocrine, vitals, etc. The further evaluation form (or forms) a candidate's health care provider will complete depends on the condition(s) revealed during a candidate's initial medical evaluation. Thus, while all candidates reaching the medical evaluation portion of the selection process will be asked to complete a medical questionnaire, only candidates for whom additional information is needed will be asked to seek further evaluation from their health care provider and submit additional information through the further evaluation forms.

- 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.]**

Consistent with the Government Paperwork Elimination Act, TSA has considered technology to reduce the burden of this collection and determined that such is not practicable. Accordingly, the collection of information from candidates under employment consideration for TSO positions is conducted manually. There are a variety of reasons that would make it difficult to make this an automated collection. For example, the SOMQ is included as part of the Medical Kit during the airport assessment process, candidate's signatures are required on the original paperwork, and the paperwork may need to be taken to multiple health care providers to evaluate the candidates. In addition, many candidates have limited or no computer access and it would be an inconvenience for them to try to obtain the SOMQ via email, the candidate dashboard, or fax.

- 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.**

As previously noted, TSA has found the SOMQ form, in conjunction with further evaluation forms as needed, more suitable than previously used forms as it more appropriately collects the information necessary to assist the health care providers in making determinations regarding candidates' medical and physical abilities to successfully perform the job without being overly intrusive.

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.***

The collection of information does not have a significant impact on a substantial number of small businesses or other small entities. As described above, the medical questionnaire information is collected from candidates under employment consideration for TSO positions. Additional information is provided for some candidates by health care providers. However, this information is limited and does not have a significant impact on a substantial number of small businesses.

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.***

The determination that TSO candidates successfully meet the qualification requirements described above is essential to create and maintain a national workforce of skilled and medically qualified employees charged with protecting the Nation's transportation systems by ensuring the freedom of movement for people and commerce. The security of the Nation's transportation systems would be severely compromised if this collection is not conducted or is conducted less frequently.

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).***

There are no 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).

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 invited public comment on this information collection requirement, a 60-day notice was published in the Federal Register on November 25, 2015 (80 FR 73806) and a 30-day notice was published on March 17, 2016, (81 FR 14472). TSA received no comments in response to the notices.

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

TSA will not provide any payment or gift to respondents.

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

TSA will maintain the information according to the Privacy Act, OPM/GOVT-10 System, Employee Medical File of Records of TSO candidates who are hired, or under the OPM/GOVT-5, Recruiting, Examining, and Placement System of Records of TSO candidates who are not hired. TSA will maintain the information in a secured area with access limited to authorized personnel who have a business need to know the information. The collection is also covered by SORN – DHS/TSA-022, which reflects TSA’s move from its legacy payroll and personnel system to become a payroll customer of the USDA’s National Finance Center (NFC). A Privacy Impact Assessment for the HRAccess Program was published by DHS on July 28, 2009.

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.

While some of the questions TSA is posing could be considered to be of a sensitive nature, TSA deems this collection necessary to evaluate a candidate’s medical suitability for the TSO job. While some of this information is commonly considered private, the collection is essential to ensure that the individuals performing TSA’s security mission are physically able to perform their duties safely, with minimal risk of injury to themselves or others, and in a manner that does not compromise security. As noted above, TSA will follow appropriate procedures to protect this information from unauthorized disclosure.

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

TSA uses the SOMQ and FE forms to collect the information necessary to assist the health care providers in making determinations regarding the medical and physical abilities of applicants for the position of TSO to successfully perform the job. The hour and cost burden calculations depend on the three stages this information collection process involves. First, all applicants for a TSO position are required to complete the initial SOMQ. Then, among the candidates reaching the medical evaluation approximately 55 percent are requested to complete one FE form. Finally, among those completing one FE form, approximately 20 percent of the candidates are requested to complete a second FE form.

Based on the data provided by TSA Office of Chief Medical Officer and Comprehensive Health Services (CHS), TSA estimates that the average annual number of respondents to this information collection process is 17,480. This results in an average of 29,017 annual responses. TSA also estimates that the total annual hour burden incurred is 14,071. The total annual hour burden cost of this information collection is estimated to be \$309,149.

Calculations:

The average annual number of respondents is determined based on the number of TSO candidates that complete the initial SOMQ. Health care providers administering the initial medical exams and health care providers executing the first and second FE forms are not included in the number of respondents, hour and burden cost calculations as they are paid for their services as per the contractual agreement with TSA.

Average number of respondents = 17,480 TSO candidates

The average annual number of responses is calculated by summing the number of responses by TSO candidates completing initial SOMQ, one and two FE forms.

Average number of responses = 17,480 (initial SOMQ) + 9,614 (one FE form) + 1,923
(two FE forms)
= 29,017 per year

To calculate the hour burden cost incurred by a TSO candidate while completing the initial SOMQ and FE forms, TSA assumes that the average wage rate of a TSO candidate is equivalent to the entry level average wage rate of a TSO currently working for TSA. Accordingly, TSA uses the fully loaded average hourly wage of \$21.97 for TSO candidates.

(a) Completing initial SOMQ

Historical data indicate that annually an average of 17,480 candidates for TSO positions complete initial medical exams at the 3,000 health care provider clinics/facilities nationwide provided by TSA, at no cost to the candidates. TSO candidates take approximately 45 minutes (0.75 hours) to complete the initial SOMQ. To estimate the cost associated with this time burden, TSA multiplies the fully loaded average hourly wage rate of \$21.97 for TSO candidates by the time burden for all respondents.

Hour burden = 17,480 responses x 0.75 hours = 13,110 hours per year
Hour burden cost = 13,110 hours per year x \$21.97 = \$288,027 per year

(b) Completing one FE form

Out of the 17,480 TSO candidates completing the initial medical exams, approximately 55 percent of those reaching the medical evaluation are requested to complete one additional supplemental evaluation form. This yields an estimated 9,614 candidates (55% x 17,480) required to complete one FE form. TSO candidates take approximately 5 minutes (0.083 hours) to complete the FE form.).

Hour burden = 9,614 responses x 0.083 hours = 801 hours per year
 Hour burden cost = 801 hours per year x \$21.97 = \$17,600 per year

(c) Completing two FE forms

Out of the 9,614 candidates required to complete one FE form, TSA estimates that 20 percent of them will need to complete a second FE form. Thus, 1,923 candidates (20% x 9,614) complete a second FE form. TSO candidates take approximately 5 minutes (0.083 hours) to complete the second FE form.

Hour burden = 1,923 responses x 0.083 hours = 160 hours per year
 Hour burden cost = 160 hours per year x \$21.97 = \$3,520 per year

Table 1: Summary of Information Collection TSO Candidates 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 ¹
	a	b	c = a x b	d	e = c x d	f = e x \$21.97
a. TSO candidates complete initial SOMQ	17,480	1	17,480	0.75	13,110.0	\$288,027
b. TSO candidates complete one FE form (55% of applicants)	9,614	1	9,614	0.0833	801.2	\$17,602
c. TSO candidates complete two FE forms (20% of candidates completing one FE form)	1,923	1	1,923	0.0833	160.2	\$3,520
Total			29,017		14,071.4	\$309,149

Note: Totals may not add due to rounding

¹ TSA assumes that the average wage rate of a TSO candidate can be approximated by the entry level average wage rate of a TSO currently working for TSA. Accordingly, the hour burden costs are calculated using the fully loaded hourly average wage rate of \$21.97 for activities in (a) – (c).

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

TSA estimates no costs in addition to the hour burdens discussed above for this information collection. TSA estimates that the average annual number of respondents to this information collection is 17,480, which results in average annual responses of 29,017 and average annual hour burden cost of \$309,124.

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.

Based on the data provided by TSA Office of Chief Medical Officer and CHS, TSA estimates that the total annual cost incurred by the Federal Government is \$503,074 (i.e., \$217,623 assessment by medical personnel+ \$285,451 shipping and storage).

Calculations:

The cost TSA incurs due to this information collection has two components. The first cost component is related to the assessment of the initial SOMQ and FE forms by a team of medical personnel. TSA estimates that the assessment team of medical personnel takes 5 minutes (0.083 hours) each to review and process the initial SOMQ, the first FE form and the second FE form. TSA also estimates that the fully loaded average hourly wage rate for a medical personnel involved in the assessment of initial SOMQ and FE forms is \$90. The second cost component is associated with shipping and storage costs. TSA estimates that the shipping cost of initial SOMQ and FE forms from the health care providers to the review location and then to a storage facility is \$9.50 per package (i.e., SOMQ or FE forms shipped per candidate). In addition, the storage cost associated with the SOMQ and FE forms is \$0.56 per TSO candidate.²

² The storage cost is per each candidate, not per each package delivered from health care providers to the storage facility. As per the contractual agreement, the initial SOMQ and the subsequent FE Forms delivered are all stored in the same candidate's file.

(a) Completing initial SOMQ

Government cost = 17,480 responses x 0.083 hours x \$90 = \$131,100 per year

(b) Completing one FE form

Government cost = 9,614 responses x 0.083 hours x \$90 = \$72,105 per year

(c) Completing two FE forms

Government cost = 1,923 responses x 0.083 hours x \$90 = \$14,418 per year

(d) Shipping SOMQ and FE forms

Government cost = 29,017 packages x \$9.50 per package = \$275,662 per year

(e) Storage of SOMQ and FE forms

Government cost = 17,480 candidates x \$0.56 per candidate = \$9,789 per year

Total government cost = \$503, 074 (sum of (a) to (e)).

Table 3: Summary of Information Collection Government Hour Burden Cost

Activity	Average Annual Respondents	Annual Number of Occurrences	Average Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	a	b	c = a x b	d	e = c x d	f = e x \$90
a. Assessment team of health care personnel review and process initial SOMQ form	17,480	1	17,480	0.0833	1456.7	\$131,100
b. Assessment team of health care personnel review and process one FE form (for 55% of candidates)	9,614	1	9,614	0.0833	801.2	\$72,105
c. Assessment team of health care personnel review and process two FE forms	1,923	1	1,923	0.0833	160.2	\$14,418

(for 20% of candidates completing one FE form)						
Total			29,017		2,418.1	\$217,623

Note: Totals may not add due to rounding

Table 4: Summary of Information Collection Government Shipping and Storage Costs

Activities	Average Annual Number of Packages or Files	Average Cost per Package	Total Annual Cost
d. Shipping costs from the health care providers to review location and then to storage facility ³	29,017	\$9.50	\$275,662
e. Storage costs associated with SOMQ and evaluation forms ⁴	17,480	\$0.56	\$9,789
Total			\$285,451

Note: Totals may not add due to rounding

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 changes to the information being collected. However, the burden has increased due to the use of better estimates provided by the program office. Also, due to improved efficiencies in the program office, the cost to TSA has decreased. For example, either the provider or the candidate will ship the FE forms when shipping packages, but not both. Therefore, the cost is per candidate delivery to the contractor, as both the candidate and the provider will complete and review the same form for shipment instead of separately as done in the past.

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 information collected.

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 and will display the expiration date for OMB approval of the information collection.

³ Both the TSO candidates and the health care providers fill in their responses on the same form. The health care providers are assumed to be the ones shipping the completed initial SOMQ and FE forms to the storage facility. As a result, the number of packages shipped is equal to the number of forms completed (29,017).

⁴ The storage cost is per file for each TSO candidate. It doesn't depend on the number of forms in a candidate's file.

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 certification statement identified in Item 19, OMB Form 83-I, Certification for Paperwork Reduction Act Submissions.