

SUPPORTING STATEMENT
Airport Security Program
49 CFR Part 1542

OMB Control No. 1652-0002
Exp. 07/31/2018

- 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 Aviation and Transportation Security Act (ATSA), Public Law 107-71, (115 Stat. 597, Nov. 19, 2001), codified at 49 U.S.C. § 114), transferred the responsibility for civil aviation security from the Federal Aviation Administration (FAA) to the Transportation Security Administration (TSA). In February 2002, TSA implemented airport operator security standards regulations through 49 CFR part 1542. The information collection required by 49 CFR part 1542, which includes information collection and recordkeeping requirements, directly supports DHS' strategic goal of safety and security in air transportation that the Department has delegated to TSA.

The following information collections and other recordkeeping requirements with which respondent airport operators must comply fall under this OMB control number: (1) development of an Airport Security Program (ASP), submission to TSA, and implementation; (2) as applicable, development of airport operator requested or TSA-required ASP amendments, submission to TSA, and implementation; (3) collection of data necessary to complete a criminal history records check (CHRC) for those individuals with unescorted access to a Security Identification Display Area (SIDA); (4) submission to TSA of identifying information about individuals to whom the airport operator has issued identification media, such as name, address, and country of birth, in order for TSA to conduct a Security Threat Assessment (STA); (5) information collection and recordkeeping requirements associated with compliance with the regulation, employees who have access privileges to secure areas of the airport, and compliance with Security Directives (SDs) issued pursuant to the regulation; and (6) matching of individuals subject to TSA's regulatory requirements against government watch lists.

TSA is revising this information collection by reducing the type of information collected. TSA previously collected information relating to a since-discontinued requirement that airport operators verify the employment histories of certain applicants. By way of background, following the events of September 11, 2001, the FAA amended 14 CFR § 107.31, which removed the requirement for employment verification by airport operators and required one hundred percent CHRCs for employee SIDA access. The FAA regulation retained the requirement for airport operators to audit their employees' employment verifications, which was transferred to TSA, and implemented in 49 CFR § 1542.209(o)(3). TSA has concluded that this requirement is no longer needed as TSA has determined there is an acceptable level of compliance overall with 49 CFR § 1542.209, and TSA has

implemented more stringent standards within SDs for CHRCs and Security Threat Assessments.

- 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.***

Security Programs

Under 49 CFR § 1542.101, airport operators that operate an airport subject to 49 CFR § 1542.103 are required to adopt and carry out an ASP for each subject airport that provides for the safety and security of persons and property on an aircraft operating in air transportation or intrastate air transportation against an act of criminal violence, aircraft piracy, and the introduction of an unauthorized weapon, explosive, or incendiary onto an aircraft. Once approved by the appropriate TSA officials, the airport operators must adhere to these programs, which specify the systems, measures, and procedures the operators will use at each airport to comply with TSA requirements. Respondent airport operators are required to maintain these ASPs on file. When TSA Transportation Security Inspectors (TSIs) conduct inspections of airport operators to verify compliance with the provisions of the TSA-approved program, TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.

Security Program Amendments

Under 49 CFR § 1542.105(b), the airport operator is required to update the ASP through amendments completed by the operator. Under §§ 1542.105(c) or (d), the airport operators must update the ASP consistent with amendments required by TSA. Under § 1542.107, airport operators are required to update their ASP when temporarily changed conditions occur at the airport which requires temporary amendments. Respondent airport operators are required to submit amendments and/or complete and implement amendments directed by TSA so that TSA TSIs can inspect those airport operators to verify compliance with the provisions of the TSA-approved program. Again, TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.

Background Checks, including Criminal History Records Checks/Security Threat Assessments

Under 49 CFR § 1542.209, airport operators are required to subject each individual with unescorted access to a SIDA to a CHRC to determine whether the individual has a disqualifying criminal offense within a relevant time-frame. To conduct a CHRC, these individuals must provide their identifying information to the airport operator, including fingerprints, and the airport operator must maintain these records. The purpose of a CHRC is to ensure that each individual having access to the SIDA of an airport does not pose a risk to transportation security. The airport operators must also collect information for Security Threat Assessments (STAs) of individuals with unescorted access at airports to secured

areas, SIDAs, sterile areas, and air operations areas. The purpose of the STA is to enable TSA to check intelligence-related and other governmental databases for relevant information about the individual to determine whether he or she poses a risk to transportation security. TSA requires airport operators to submit identifying information, such as name, address, and country of birth, about individuals so that the airport operator may, among other things, verify the individual's identity and authorization to work in the United States before the airport operator issues identification media.

Other Recordkeeping Requirements

Under 49 CFR § 1542.213(b), airport operators are required to ensure that no individual is authorized unescorted access to the secured area or SIDA unless that individual has successfully completed training in accordance with the TSA-approved curriculum specified in its TSA-approved ASP. The airport operator must maintain a record of all training and information given to each individual who receives such training, and must further maintain such records for 180 days after the termination of that person's unescorted access authority. TSA regulatory inspectors then inspect those airport operators to verify compliance with the training provision of the TSA-approved program. Again, TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.

Under 49 CFR § 1542.217(d), airport operators are required to maintain those records associated with the training of the law enforcement officers (LEOs) assigned to respond at the airport. The airport operator must maintain a record of the type of training given to each LEO who receives such training.

Under 49 CFR § 1542.221, airport operators are required to ensure that a record is made of each law enforcement action made at the airport. The airport operator can maintain these records or allow the responding law enforcement agency to manage such records. The airport operator must maintain those records for a minimum of 180 days and allow for TSA inspection. TSA uses this information, together with information generated independently by TSA as it conducts its own passenger and baggage screening as well as other related activities, to monitor the effectiveness of the overall level of security in the system.

Under 49 CFR § 1542.303, airport operators are required to comply with each Security Directive (SD) issued by TSA. When TSA determines that additional security measures are necessary to respond to a threat assessment or to a specific threat against civil aviation, TSA issues such a SD, which includes requirements for operators to maintain records and provide information to TSA, such as that data collected and retained for STAs and watch list matching. The airport operator must maintain an electronic record, paper record, or a comparable TSA-approved records verification system of the documents required to be collected under SDs. TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.

Under 49 CFR § 1542.209(k), airport operators are required to maintain records of compliance for those employees with unescorted access privileges in SIDAs at the airport. These records include records of training and background checks on all employees who have such unescorted access. TSA TSIs review these records to ensure that the safety and security of the public is not compromised, and use this information to take corrective action when necessary.

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.]***

Airport operators have the latitude and flexibility to maintain or report the required information in a manner that best meets their particular operational needs, to include electronic formats. Thus, this collection is in compliance with the Government Paperwork Elimination Act (GPEA); electronic signatures are not applicable to this program. It is estimated that 70 percent of airport operators currently maintain most of these records electronically.

Airport operators can access a secure portal on the Department of Homeland Security's Homeland Security Information Network (HSIN) to obtain guidance for this information collection.

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.***

Prior to TSA's existence, this information collection was conducted by the FAA. To TSA's knowledge, since the responsibility for this collection transferred to TSA, with the exception of the information below, it has not been duplicated anywhere else.

Similarly, pursuant to regulation, the U.S. Customs and Border Protection (CBP) agency requires CHRCs be conducted on individuals with unescorted access to CBP's designated airport Federal Inspection Station (FIS) areas. Some individuals working at the airport may need access to the airport secured areas and SIDAs regulated by TSA and the FIS area controlled by CBP. However, typically, TSA usually does not know whether access is needed to the FIS until after the individual applies for the SIDA, rather than contemporaneously. Because a CHRC would be required by both agencies for the same applicant, it would be optimal and consistent with the government's view that applicants' fingerprints and associated FBI fees should be collected once rather than twice, and any resulting rap sheets shared among the airport and CBP where the applicant is seeking access.

TSA has short- and long-term solutions to this scenario. Today, CBP may obtain the rap sheets from the airport when a SIDA worker applies for or needs access to the FIS. Thus, the applicant is not required to undergo a new fee or CHRC.

On July 5, 2016, OMB approved this information collection and issued a terms of clearance (TOC), requiring TSA to “report back to OMB six months prior to the submission of its efforts to modernize and consolidate its vetting architecture to allow other entities, such as CBP, to obtain data on applicants directly from TSA’s system and reduce duplication.” To address the TOC, TSA formed a working group with CBP. TSA looked at the hour burden of the FIS collection of information in comparison to the hour burden of this information collection. The FIS collection has an average annual burden hours of 42,500, while this collection has approximately 2 million annual burden hours. In light of this disparate comparison, TSA determined that it would not be cost effective to modernize its vetting architecture for the FIS population due to budget constraints. However, TSA continues to use the working group to learn the best methods to share CHRC data.

In an effort to minimize any duplicate collections, the TSA continually strives to work with and identify other entities who have a need to know the information in the performance of their official duties pursuant to the Privacy Act, 5 U.S.C. § 552a552A(b)(1), in an effort to reduce redundancy of information collection processes.

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 amount of information required by this collection is proportional to the size of each airport operator’s organization and therefore does not create 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.*

TSA has the responsibility of ensuring the security of persons and property traveling within, to, from, and over the United States. Regulations at 49 CFR part 1542 require airport operators regularly serving operations of certain aircraft operators or foreign air carriers described in 49 CFR parts 1544 or 1546, respectively, to adopt and implement an ASP that provides for the safety and security of persons and property on an aircraft operating in air transportation or intrastate air transportation against acts of criminal violence, aircraft piracy, and the introduction of an unauthorized weapon, explosive, or incendiary onto an aircraft. This information is necessary to ensure airport operators within the United States provide adequate security measures. All collected information is subject to review during the TSA inspection process to verify airport operator compliance with regulatory requirements.

Due to ever changing security risks and assessments, it may be necessary, with short notice, to require airport operators to perform certain security measures which may involve maintaining records and providing information to TSA more often than regularly noted in its ASP. TSA conveys the need for such security measures to the airport operator via amendments to its ASP and/or by issuing SDs when appropriate. A consequence of not requiring such collections would be that TSA could not adequately ensure the security of the aviation transportation system.

If any airport operator is unable to meet a changed requirement, airport operators are provided, via the regulation, an opportunity to indicate they cannot meet such requirements, due to the uniqueness of their operation. Airport operators may then provide to TSA an alternate means by which they can meet the intent of the required TSA security measures. TSA handles such requests on a case-by-case basis.

If TSA did not require the collection of information, TSA would be hindered in improving security procedures and systems at airports. Revisions to procedures, staffing, and other resource allocations rely heavily upon the data developed through this collection effort.

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).*

5 CFR § 1320.5(d)(2)(i) requires the collecting agency to demonstrate why a respondent must report more often than quarterly. Under SDs, airport operators are required to compare all persons to whom the airport operator has issued SIDA, sterile area, or other ID media, to the “no-fly” and “selectee” watch lists, and then report matches to TSA immediately.

Additionally, it may be necessary, with short notice, to require airport operators to perform certain security measures which may involve maintaining records and providing information to TSA more often than regularly noted in its ASP. TSA conveys the need for such security measures to the airport operator via amendments to its ASP and/or by issuing SDs when appropriate.

5 CFR § 1320.5(d)(2)(iv) requires the collecting agency to demonstrate why a respondent must retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years. For security purposes, information submitted by the airport operator must be maintained for 180 days after the end of employment of the individual, which could be more than three (3) years.

49 CFR § 1542.209(k)(5) requires all records be maintained for at least 180 days after the termination of an individual’s unescorted access to secure areas of airports. This may require airport and aircraft operators to maintain records of employees for over three years as described in 5 CFR § 1320.5(d)(2)(iv).

Otherwise, the collection is conducted in accordance with 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 published a 60-day notice for comment, as required by 5 CFR § 1320.8(d), see 82 FR 42356 (Sep. 7, 2017), and a 30-day notice, see 83 FR 20086 (May 7, 2018). Consistent with the requirements of Executive Order (E.O.) 13771, *Reducing Regulation and Controlling Regulatory Costs*, and E.O. 13777, *Enforcing the Regulatory Reform Agenda*, the notices included a specific request for comments on the extent to which this request for information could be modified to reduce the burden on respondents. TSA received no comments.

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

TSA does not provide any payment or gift to the respondents.

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

TSA does not provide any assurances of confidentiality. Information provided by individuals will be protected from disclosure to the extent appropriate under the applicable provision of the Freedom of Information Act and the Privacy Act of 1974. Personally identifying information will be collected and transmitted in accordance with the Privacy Act. To the extent that the information collected is Sensitive Security Information (SSI) as defined in 49 CFR part 1520, "Protection of Sensitive Security Information," such information is protected from public disclosure.

Additionally, 49 CFR §§ 1542.209(k)(4) and 1544.229(k)(3) and a related Security Directive require airport and aircraft operators to maintain records in a manner that protects confidentiality of the individual and is acceptable to TSA.

A Privacy Impact Assessment (PIA) is provided under DHS/TSA/PIA-020 Security Threat Assessment for Airport Badge and Credential Holders; and a System of Records Notice (SORN) is provided under DHS/TSA-002 Transportation Security Threat Assessment System.

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.

There are no questions of sensitive nature.

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

New Security Programs

TSA estimates an average of approximately 1 respondent¹ per year will create an ASP. TSA estimates that it takes approximately 500 hours to create an ASP.² TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).³

TSA estimates that the average annual burden to create an ASP is 500 hours, resulting in an hour burden cost of \$44,572. Table 1 shows the hour burden and cost estimation.

New ASP	Average Annual Respondents	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	1	1	500	500	\$44,572

Note: Calculations may not be exact due to rounding in the table.

TSA-Directed Amendments

TSA estimates that an average of approximately 438 respondents⁴ will be issuing TSA-Directed Amendments annually, and one response per respondent per year. TSA estimates that it takes approximately 250 hours to add to their ASP any amendments promulgated by TSA.⁵ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).⁶

¹ Estimate provided by TSA Office of Security Policy and Industry Engagement (OSPIE) subject matter expert.

² Ibid.

³ TSA uses the average hourly wage rate of \$60.62 for General and Operations Managers as a proxy wage rate for the security coordinator at an airport. BLS, May 2016 National Industry-Specific Occupational Employment and Wage Estimates, General and Operations Managers (11-1021). Last modified: March 31, 2017. https://www.bls.gov/oes/2016/may/naics3_481000.htm. Retrieved: July 26, 2017. TSA uses the compensation factor for all full-time workers in private industry as a proxy for security coordinators at airports. For all full-time workers in private industry, hourly total compensation is \$39.16 and hourly wages and salaries are \$26.63. TSA estimates the compensation factor as 1.4705 (\$39.16 ÷ \$26.63). BLS, News Release, Employer Costs for Employee Compensation - June 2017. Table 11. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers, by occupational group and full-time and part-time status, June 2017. Release date: September 8, 2017. https://www.bls.gov/news.release/archives/ecec_09082017.htm. Retrieved: September 8, 2017. TSA estimates that the fully loaded average hourly wage rate is \$89.14304 (\$60.62 × 1.4705).

⁴ See footnote 1.

⁵ Ibid.

⁶ See footnote 3.

TSA estimates that the average annual burden to add to their ASP any amendments promulgated by TSA is 109,500 hours, resulting in an hour burden cost of \$9,761,163. Table 2 shows the hour burden and cost estimation.

Table 2: Total Hour Burden Estimates for TSA-Directed Amendments

TSA-Directed Amendments	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	438	1	250	109,500	\$9,761,163

Note: Calculations may not be exact due to rounding in the table.

Airport-Requested Amendments

TSA estimates that an average of approximately 438 respondents⁷ will request amendments annually, and ten responses per respondent. TSA estimates that it takes approximately 25 hours to prepare each amendment.⁸ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).⁹

TSA estimates that the average annual burden to prepare Airport-Requested Amendments is 109,500 hours, resulting in an hour burden cost of \$9,761,163. Table 3 shows the hour burden and cost estimation.

Table 3: Total Hour Burden Estimates for Amendments-Airport-Requested

Amendments-Airport-Requested	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	438	10	25	109,500	\$9,761,163

Note: Calculations may not be exact due to rounding in the table.

Amendments for Temporary Changed Conditions

TSA estimates that an average of approximately 438 respondents¹⁰ will be issued amendments to their ASP on the basis of temporary changes in conditions annually, and 15 amendments per respondent per year. TSA estimates that it takes approximately 40 hours to prepare each amendment.¹¹ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).¹²

TSA estimates that the average annual burden to prepare amendments for temporary changed conditions is 262,800 hours, resulting in an annual hour burden cost of \$23,426,791. Table 4 shows the hour burden and cost estimation.

⁷ See footnote 1.

⁸ Ibid.

⁹ See footnote 3.

¹⁰ See footnote 1.

¹¹ Ibid.

¹² See footnote 3.

Table 4: Hour Burden for Amendments-Temporary Changed Conditions

Amendments- Temporary Changed Conditions	Average Annual Respondents	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	438	15	40	262,800	\$23,426,791

Note: Calculations may not be exact due to rounding in the table.

CHRC Applications

TSA estimates that an average of approximately 936,444 respondents¹³ will have CHRC applicants annually.¹⁴ TSA estimates that it takes approximately 0.5 hours to apply for a CHRC application.¹⁵ TSA uses the fully loaded average hourly wage rate of \$28.693 to estimate the respondents' value of time (opportunity cost).¹⁶

TSA estimates that the average annual burden to complete the CHRC application is 468,222 hours, resulting in an average annual hour burden cost of \$13,434,855. Table 5 shows the hour burden and cost estimation.

¹³ Data provided by TSA Office of Intelligence and Analysis, as of February 2017. For the first year of the analysis and subsequent years, TSA applied an annual growth rate of 1.0534 based on annual population growth from 2013 to 2016.

¹⁴ Under 49 CFR § 1542.209, airport operators are required to subject each individual with unescorted access to a SIDA to a CHRC in order to determine whether the individual has a disqualifying criminal offense within a relevant time-frame.

¹⁵ See footnote 1.

¹⁶ TSA uses a weighted average hourly wage rate of \$28.69 for First-Line Supervisors of Helpers, Laborers, and Material Movers, Hand; Aircraft Cargo Handling Supervisors; and Laborers and Freight, Stock, and Material Movers, Hand as a proxy wage rate for the airport employees requiring a CHRC. BLS, May 2016 National Industry-Specific Occupational Employment and Wage Estimates, First-Line Supervisors of Helpers, Laborers, and Material Movers, Hand (53-1021); Aircraft Cargo Handling Supervisors (53-1011); Laborers and Freight, Stock, and Material Movers, Hand (53-7062). Last modified: March 31, 2017.

https://www.bls.gov/oes/2016/may/naics3_481000.htm#53-0000. Retrieved July 26, 2017. TSA estimates the fully loaded average wage rate is \$28.69335. TSA uses the compensation factor for all full-time workers in private industry as a proxy for the airport employees requiring a CHRC. For all full-time workers in private industry, hourly total compensation is \$39.16 and hourly wages and salaries are \$26.63. TSA estimates the compensation factor as 1.4705 (\$39.16 ÷ \$26.63). BLS, News Release, Employer Costs for Employee Compensation - June 2017. Table 11. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers, by occupational group and full-time and part-time status, June 2017. Release date: September 8, 2017. https://www.bls.gov/news.release/archives/eccec_09082017.htm. Retrieved: September 8, 2017. TSA estimates that the fully loaded average hourly wage rate is \$28.69335.

Table 5: Total Hour Burden for CHRC Applications

CHRCs Applications	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$28.693
Year 1	888,171	0.50	444,086	\$12,742,302
Year 2	935,600		467,800	\$13,422,743
Year 3	985,561		492,780	\$14,139,520
Total	2,809,331		1,404,666	\$40,304,565
Average	936,444		468,222	\$13,434,855

Note: Calculations may not be exact due to rounding in the table.

STA Applications

TSA estimates that an average of approximately 1,549,130 respondents¹⁷ will have STA applications per year. TSA estimates that it takes approximately 0.35 hours to complete the STA application.¹⁸ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).¹⁹

TSA estimates that the average annual burden to complete the STA application is 542,196 hours, resulting in an average annual hour burden cost of \$48,332,959. Table 6 shows the hour burden and cost estimation.

Table 6: Total Hour Burden Estimates for STA Applications and Records

STA Applications	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$89.143
Year 1	1,469,274	0.35	514,246	\$45,841,444
Year 2	1,547,734		541,707	\$48,289,386
Year 3	1,630,383		570,634	\$50,868,049
Total	4,647,390		1,626,587	\$144,998,878
Average	1,549,130		542,196	\$48,332,959

Note: Calculations may not be exact due to rounding in the table.

Watch List Matching

TSA estimates that an average of 76 respondents²⁰ will be required to conduct watch list matching of all persons to whom the airport operator has issued SIDA, sterile area, or other ID media against government watch lists annually, with one response per respondent. TSA estimates that it will take approximately 60 hours to conduct watch list matching.²¹ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).²²

¹⁷ See footnote 13.

¹⁸ See footnote 1.

¹⁹ See footnote 3.

²⁰ See footnote 1.

²¹ See footnote 1.

²² See footnote 3.

TSA estimates that the average annual burden to complete the watch list matching is 4,560 hours, resulting in an annual hour burden cost of \$406,492. Table 7 shows the hour burden and cost estimation.

Table 7: Total Hour Burden for Watch List Matching

Watch List Matching	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	76	1	60	4,560	\$406,492

Note: Calculations may not be exact due to rounding in the table.

Watch List Match Resolution

TSA estimates that an average of 76 respondents²³ will be subject to the watch list matching requirement annually, and have an average of 50 resolutions annually. TSA estimates that it will take approximately 1 hour for resolution time for each watch list match.²⁴ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).²⁵

TSA estimates that the average annual burden to complete the watch list matching requirement is 3,800 hours, resulting in an annual hour burden cost of \$338,744. Table 8 shows the hour burden and cost estimation.

Table 8: Total Hour Burden Estimates for Watch List Match Resolution

Watch List Match Resolution	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	76	50	1	3,800	\$338,744

Note: Calculations may not be exact due to rounding in the table.

CHRC/STA Recordkeeping

TSA estimates that an average of 1,549,130 respondents²⁶ will fulfill the CHRC and STA paperwork recordkeeping maintenance requirement annually. TSA estimates that it takes approximately 0.083 hours, or five minutes, per response to fulfill the CHRC and STA paperwork recordkeeping maintenance requirement.²⁷ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondent's value of time (opportunity cost).²⁸

²³ See footnote 1.

²⁴ See footnote 1.

²⁵ See footnote 3.

²⁶ See footnote 13.

²⁷ See footnote 1.

²⁸ See footnote 3.

TSA estimates that the average annual burden to fulfill the CHRC and STA paperwork recordkeeping maintenance requirement is 128,578 hours, resulting in an annual hour burden cost of \$11,461,816. Table 9 shows the hour burden and cost estimation.

Table 9: Total Hour Burden Estimates for CHRCs/STA Records

CHRC/STA Records	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$89.143
Year 1	1,469,274	0.083	121,950	\$10,870,971
Year 2	1,547,734		128,462	\$11,451,483
Year 3	1,630,383		135,322	\$12,062,994
Total	4,647,390		385,733	\$34,385,448
Average	1,549,130		128,578	\$11,461,816

Note: Calculations may not be exact due to rounding in the table.

SIDA Training Recordkeeping

TSA estimates that an average of 861,006 respondents²⁹ will be subject to maintain SIDA training records annually. TSA estimates that it takes approximately 0.083 hours, or five minutes per response to maintain SIDA training records.³⁰ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).³¹

TSA estimates that the average annual burden to maintain SIDA training records is 69,668 hours, resulting in an annual hour burden cost of \$1,999,004. Table 10 shows the hour burden and cost estimation.

Table 10: Total Hour Burden for SIDA Training

SIDA Training Records	Average Annual Responses	Hour Burden per response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$28.693
Year 1	796,103	0.083	66,077	\$1,895,958
Year 2	838,615		69,605	\$1,997,202
Year 3	883,397		73,322	\$2,103,853
Total	1,722,012		209,004	\$5,997,013
Average	861,006		69,668	\$1,999,004

Note: Calculations may not be exact due to rounding in the table.

²⁹ See footnote 13

³⁰ See footnote 1.

³¹ See footnote 3.

LEO Training and Response Recordkeeping

TSA estimates that an average of 438 respondents³² will fulfill this LEO training and response recordkeeping requirement annually, with one response per respondent. TSA estimates that it takes approximately 200 hours to fulfill the LEO training and security response recordkeeping requirement.³³ TSA uses the fully loaded average hourly wage rate of \$89.143 to estimate the respondents' value of time (opportunity cost).³⁴

TSA estimates that the total annual burden to fulfill the LEO training response recordkeeping requirement is 87,600 hours, resulting in an annual hour burden cost of \$7,808,930.

Table 11: Total Hour Burden for LEO Training and LEO Response

LEO Training and LEO Response	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$89.143
	438	1	200	87,600	\$7,808,930

Note: Calculations may not be exact due to rounding in the table.

The average estimated annual hour burden for airport operators to fulfill the requested information collections is 1,786,924 hours and the total annual hour burden cost is \$126,776,490.

TSA does not anticipate any additional recordkeeping burdens for software requirements and storage costs as these are already maintained as part of current industry practices.

Total Average Annual Hour Responses and Burden

	New Security Programs	TSA-Directed Amendments	Airport Requested Amendments	Amendments Temp. Changed Conditions	CHRC Applications	STA Applications	Watch List Matching	Watch List Match Resolution	CHRCs/STA Recordkeeping	SIDA Training & Recordkeeping	LEO Training & Response	Total
	Table 1	Table 2	Table 3	Table 4	Table 5	Table 6	Table 7	Table 8	Table 9	Table 10	Table 11	
Annual Average Responses	1	438	4,380	6,570	936,444	1,549,130	76	3800	1,549,130	861,006	438	4,911,413
Annual Average Hour Burden	500	109,500	109,500	262,800	468,222	542,196	4,560	3,800	128,578	69,668	87,600	1,786,924

³² See footnote 1.

³³ See footnote 1.

³⁴ See footnote 3.

Total Annual Hour Burden Cost												
Average Annual Hour Burden Cost	New Security Programs	TSA-Directed Amendments	Airport Requested Amendments	Amendments Temp. Changed Conditions	CHRC Applications	STA Applications & Records	Watch List Matching	Watch List Match Resolution	CHRCs/STA Records	SIDA Training	LEO Training & Response	Total
	Table 1	Table 2	Table 3	Table 4	Table 5	Table 6	Table 7	Table 8	Table 9	Table 10	Table 11	
	\$44,572	\$9,761,163	\$9,761,163	\$23,426,791	\$13,434,855	\$48,332,959	\$406,492	\$338,744	\$11,461,816	\$1,999,004	\$7,808,930	\$126,776,490

13. Provide an estimate of annualized capital and start-up costs.

Employees requiring a CHRC must have their fingerprints taken and submitted to TSA. While airport operators actually collect this information and submit it to TSA, the fees are usually paid by the individual requesting access to the sterile area, secure area, air operations area, or SIDA. TSA uses the fee of \$56.08,³⁵ to estimate the annual cost to respondents for CHRC fees of \$52,514,703 (936,444 average annual responses x \$56.08).

Table 12: Total Estimated Annual Cost to Respondents for CHRC Fees

CHRCs Fees	Average Annual Responses	Cost Burden per Response	Average Annual Cost Burden
	A	B	C = A x B
Year 1	888,171	\$56.08	\$49,807,622
Year 2	935,600		\$52,467,359
Year 3	985,561		\$55,269,126
Total	2,809,331		\$157,544,108
Average	936,444		\$52,514,703

Note: Calculations may not be exact due to rounding in the table.

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.

TSA uses the fully loaded average hourly wage rate of \$38.365,³⁶ to estimate TSA employees' cost to conduct inspections of airport operators.

³⁵ In 2011, the National Aviation Trades Association (NATA) charged a fee for this service ranging from \$29 to \$75. TSA used the midpoint of this range, \$52 in previous information collection renewals, TSA adjusted this fee to 2016 dollars based on the GDP deflator from 2011 to 2016. TSA calculated the GDP deflator of 1.07844 by dividing the Price Index for GDP of 111.419 in 2016 by 103.315 in 2011. TSA then multiplied the \$52 by 1.07844 to get \$56.08. BEA National Data, Table 1.1.4. Price Indexes for Gross Domestic Product, Line 1 Gross Domestic Product. Last revised: September 28, 2017. Retrieved: October 6, 2017.

³⁶ The total compensation for H Band (equivalent to GS -9/11) TSA personnel is \$80,069 per year (including locality adjustment and other benefits). Source: Modular Cost Standards FY18, TSA Financial Management Division. $\$38.365 = \$80,069 \div 2,087$ annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. L. 99-272, 100 Stat. 82, April 7, 1986) Source: Consolidated Omnibus Budget Reconciliation Act.

TSA estimates that TSA (or the Federal Government) incurs an average annual burden of 28.5 hours to conduct inspections of airport operators, resulting in an annual hour burden cost of \$478,919. Table 13 shows the total hour burden cost estimate for TSA.

Loaded Hourly Wage Rate H Band (TSA TSI)	Number of Airports	Number of Hours	Total TSA Costs
A	B	C	D = A x B x C
\$38.365	438	28.5	\$478,919

Note: Calculations may not be exact due to rounding in the table.

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

TSA revised its burden estimates from the previous Information Collection Request submission based on the latest available data. There was a change in both the number of responses and burden hours associated with this collection. There was a decrease in the average annual inspections, wage rate of a TSA TSI who conducts inspections of airport operators, and a decrease in the total annual cost burden. There was a decrease in the wage rate of airport employees requiring a CHRC. The Employment Standards Recordkeeping hour burden was eliminated due to no longer being applicable to this information collection request.

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.

This information collection will not be published for statistical purposes.

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