

INFORMATION COLLECTION SUPPORTING STATEMENT

Certified Cargo Screening Standard Security Program
OMB Control Number 1652-0053
Exp.: 7/31/2019

- 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).**

Section 1602 of The Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. 110-53, 121 Stat. 266, Aug. 3, 2007) (August 2007) (9/11 Act) required the development of a system to screen 100 percent of such cargo no later than August 2010. TSA currently requires 100 percent screening of all cargo transported on passenger aircraft.¹ The screening of air cargo must be in a manner approved by TSA and be commensurate with the level of security for the screening of passenger checked baggage.² As part of these regulatory provisions, TSA certifies qualified facilities as Certified Cargo Screening Facilities (CCSF) to screen cargo as part of the Certified Cargo Screening Standard Security Program (CCSSSP). Under this regulatory program, TSA certifies qualified persons as Certified Cargo Screening Facilities (CCSF). See 49 CFR part 1549. CCSFs may screen cargo off-airport and must implement measures to ensure a secure chain of custody from the point of screening to the point at which the cargo is tendered to the aircraft operator. CCSFs are required to engage TSA to assess whether a person or entity meets the standards of their security program.

In order to comply with the statutory mandate, the CCSSSP allows shippers, indirect air carriers (IACs), and other entities to participate voluntarily in a program in which TSA certifies qualified entities to screen air cargo off-airport before it is tendered to air carriers for transport on passenger aircraft. The collection of information under the CCSSSP (see OMB number 1652-0053) are incorporated into this Information Collection Requirement (ICR).

As a signatory to the Convention on International Aviation, the United States has agreed to apply the standards contained in Annex 17 as promulgated by the International Civil Aviation Organization (ICAO). Amendment 14 of Annex 17 removed the distinction between passenger and cargo operations and now requires that all cargo be subject to security controls, including screening where practicable, on all commercial air transport operations.³ ICAO has provided until June 30, 2021 for member state to implement the above standard. When considering the current requirement to screen 100% of air cargo transported on passenger aircraft, TSA expects that there will be an increase in demand for more options to mitigate the cost of screening cargo as the United States begins to build up and implement security controls to meet the June 30, 2021 deadline to implement Annex 17, Standard 4.6.1.

TSA developed the Certified Cargo Screening Program (CCSP) as a regulatory program to support the 2007 statutory mandate to require air carriers to screen 100 percent of cargo transported on passenger aircraft.⁴ To mitigate the burden of compliance with the statutory

¹ See 49 CFR §§ 1544.205(g) and 1546.205(g)(1).

² *Id.* See also 49 U.S.C. § 44901(g)(2).

³ See Convention of International Civil Aviation, Amendment 14, Annex 17, Standard 4.6.1.

⁴ See 49 U.S.C. 44901(g). The requirement for screening 100 percent of the cargo transported on passenger aircraft was implemented through TSA's regulations, including amendments to parts 1515, 1520, 1540, 1544, 1546, 1548, and adding

mandate, the CCSSSP allows shippers, indirect air carriers (IACs), and other entities to voluntarily choose to participate in a program in which TSA certifies qualified entities to screen air cargo (including off-airport) before it is tendered to air carriers for transport on passenger aircraft. The collections of information under the CCSSSP (see OMB number 1652-0053) are incorporated into this Information Collection Requirement (ICR).

TSA is revising the collection in response to changing conditions in the air cargo industry. Consistent with the need to expand screening capabilities to meet the International Civil Aviation Organization (ICAO) standards that take effect in 2021, Congress subsequently amended TSA's authorities to require development of a program for TSA to certify third-party canine-cargo (3PK9-C) Teams to screen air cargo.⁵ TSA incorporated this capability under the framework of the CCSSSP. As a result, canine team providers can choose to be regulated as CCSFs under 49 CFR part 1549. As holders of a Certified Cargo Screening Program-Canine (CCSP-K9), they can contract with air carriers and other CCSFs to screen air cargo with Certified 3PK9-C Teams.

All CCSFs are required to allow TSA to assess whether a person or entity meets the standards of the applicable security program requirements. A CCSF-K9 is an inherently mobile capability that can screen cargo at the facility owned and operated by one of TSA's regulated entities. As holders of a CCSP-K9 security program, they can contract with air carriers and standard CCSFs off-airport, to screen air cargo with canine explosives detection teams. The 3PK9-C program allows non-governmental certifiers, operating under the 3PK9-C Certifier Order, to evaluate canine teams to determine whether these teams meet the TSA certification standards.

As part of the 3PK9-C Program, TSA also initiated a process to recognize non-governmental entities to evaluate third-party canine teams to determine whether these teams meet TSA's standards for the certification of explosives detection canine teams approved to screen air cargo. To be effective security, TSA must have confidence that the screening conducted by Certified 3PK9-C Teams will protect air cargo by identifying unauthorized explosives, incendiaries, and other destructive substances and protect the air cargo from the introduction of these destructive substances from the time the cargo is screened until it is accepted by an aircraft operator or a foreign air carrier for transport. To provide this confidence, TSA established uniform processes and standards for approval of 3PK9-C Certifiers, including qualification of personnel who will evaluate canine teams and consistent application of TSA's criteria for canine teams seeking certification or recertification as a Certified 3PK9-C Team. As with the CCSF-K9s, qualified persons may apply to become a 3PK9-C Certifier. If approved, the 3PK9-C Certifier agrees to comply with an Order issued by TSA under the authority of 49 U.S.C. 46105.

The collections of information under the CCSSSP (see OMB number 1652-0053) are incorporated into this Information Collection Requirement (ICR). The following are required to maintain the CCSSSP: CCSF applications, 3PK9 certifier applications, STA applications, criminal history records check, recordkeeping information, security program information, 3PK9-C certifier order, significant security concerns information, and security coordinator information. These will be discussed further in #2 below.

part 1549. See 76 FR 51848 (Aug. 18, 2011).

⁵ See sec. 1941 of the FAA Reauthorization Act of 2019 (Pub. L. 115-254; 132 Stat. 3186; Oct. 5, 2018).

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.**

(1a) **CCSF Applications.** A CCSF and CCSF-K9 applicant is required to submit an application to become a CCSF at least 90 days before the intended date of operation. In addition, once certified as a CCSF, the CCSF is required to submit any changes to the application information as they occur. CCSFs must renew their certification every 36 months by submitting a new complete application. CCSF applicants are required to provide TSA access to their records, equipment, and facilities necessary for TSA to conduct an eligibility assessment. (49 CFR 1549.7). A CCSF-K9 applicant must also submit an Operational Implementation Plan (OIP), described within the CCSP-K9 and any changes to the plan information as they occur.

(1b) **3PK9-C Certifier Applications.** TSA will require submission of initial applications, and updates to information in an application, by any person interested in being a 3PK9-C Certifier under the 3PK9-C Certifier Order.

(2a) **STA Applications.** TSA regulations require CCSF applicants to ensure that individuals performing cargo screening and related functions, and their supervisors have completed an STA conducted by TSA. In addition, TSA regulations require CCSF Security Coordinators and their alternates to successfully have completed an STA. TSA regulations further require these individuals to submit personally identifiable information so that TSA can perform STAs. See TSA Form 419F, previously approved under OMB control number 1652-0040 (49 CFR 1549.111 and 1549.103).

(2b) **Criminal History Records Check (CHRC).** TSA will require 3PK9-C Certifiers, 3PK9-C Canine Teams, employees and authorized representatives, and those authorized to conduct 3PK9-C Program activities with unescorted access to a Security Identification Display Area (SIDA), screening of air cargo, or carrying of explosives in the air cargo environment, to provide personally identifiable information including fingerprints so that they can undergo a CHRC.

(3) **Recordkeeping.** TSA requires CCSFs (49 CFR 1549.105) and 3PK9-C Certifiers to maintain records of compliance and make them available for TSA inspection.

(4a) **Security Programs.** TSA requires CCSFs and CCSF-K9s to accept and operate under a standard security program provided by TSA, or submit a proposed modified security program or amendment(s) to the designated TSA official for approval initially and periodically thereafter as required (49 CFR 1549.7).

(4b) **The 3PK9-C Certifier Order.** TSA will require 3PK9-C Certifiers to accept standards provided by TSA, or submit a proposed modified standard to the designated TSA official for approval initially and periodically thereafter as required.

(5) **Significant Security Concerns Information.** TSA will require CCSFs, 3PK9-C Certifiers, and CCSP-K9 Holders to report to TSA incidents, suspicious activities, and/or threat information.

(6) **Security Coordinator.** TSA will require CCSFs and 3PK9-C Certifiers to provide the name and contact information of the Security Coordinator (SC) and one or more designated alternates at the corporate or ownership level.

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.***

CCSF and 3PK9-C Certifier applicants have the latitude and flexibility to maintain the required information in a manner that best meets their particular needs, including maintaining the information electronically. CCSF and 3PK9-C Certifier applicants submit applications and related information required under the TSA regulations electronically through email. TSA also accepts paper applications by mail. TSA has systems in place to serve as repositories of information on participating CCSFs and 3PK9-C Certifiers to support the application process, including the STA application and review processes. Individuals submit personally identifiable information required for TSA to conduct STAs via a web-based tool. For those respondents without the resources or desire to submit information electronically, TSA will continue to work with entities to ensure methods are in place to submit and/or maintain the required information in a manner that best meets their needs.

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.***

In lieu of an STA application, TSA may accept the following: a current Hazardous Materials Endorsement (HME) identified in 49 CFR part 1572 evidenced by a State-issued commercial driver's license (CDL) with hazardous materials endorsement; a current Transportation Worker Identification Credential (TWIC) in accordance with a TSA regulations on Transportation TWIC implementation in the Maritime Sector; a current Free and Secure Trade (FAST) card issued by the U.S. Customs and Border Protection under the FAST program; a criminal history records check that included a name-based check; or, another STA determined by TSA to be comparable to the STA specified in the regulations. In addition, TSA may also accept the following from 3PK9-C Certifier applicants: a current enrollment in one of the following DHS Trusted Traveler Programs: TSA Pre✓[®] Application Program, Global Entry, NEXUS, or Sentri.

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.***

This collection does not have a significant impact on a substantial number of 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.***

The CCSFs and 3PK9-C Certifiers provide a process through specified programs for the air cargo industry to meet the congressionally mandated requirement to screen 100 percent of all air cargo. TSA must create programs to ensure methods of screening 100 percent of air cargo remain in place. If this information collection is not conducted, the air cargo industry may not be able to screen 100 percent of cargo transported on aircrafts without significant delays, which may have a negative effect on commerce.

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).***

CCSFs and 3PK9-C Certifiers are required to submit any changes to their initial application as they occur, which may be more frequently than quarterly.

Under TSA regulations, for individuals required to undergo an STA (for example, an individual authorized to perform screening functions), TSA notifies the individual's employer in writing that it has served a Determination of No Security Threat, a Final Determination of Threat Assessment, or a Withdrawal of Final Determination of Threat Assessment, as applicable, to the individual. In the interest of transportation security, the employers are required to retain this notification for 180 days after the employee has separated from the company.

CCSF-K9 providers and Certified 3PK9-C Teams are required to complete certification and recertification events in order to manage and become certified cargo screening canine teams under TSA regulations. All records are retained for 180 days after the individual is no longer a participant of the 3PK9-C Certifier Order and the 3K9-C Program.

The following records must also be retained for 180 days after the individual is no longer employed by the CCSF or the 3PK9-C Certifier or is no longer acting as the facility's agent:

(1) Records of all training and instruction given to each individual under the security requirements of 49 CFR part 1549, subpart B.

(2) Records demonstrating that each individual has complied with the STA provisions of 49 CFR 1549.111.

The following records must be retained until the next re-certification or until instructed by TSA to retain the records for a longer period, which may be longer than three years:

(1) Copies of all applications for approval or renewal of approval by TSA to operate as a CCSF under 49 CFR part 1549.

(2) Copies of TSA's approval and renewals of approval as required by 49 CFR part 1549.

(3) Copies of Certification Events for the initial and renewal process.

(4) Copies of records for audits.

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 publicized the regulation associated with these collections after extensive consultation with industry through its Aviation Security Advisory Committee, and with other Federal agencies, including the U.S. Department of Transportation and the U.S. Customs and Border Protection. Frequent outreach and consultation with industry trade groups and representatives continues. TSA published a 60-day notice in the *Federal Register* on December 13, 2018 (83 FR 64147), and published a 30-day notice on July 2, 2019 (84 FR 31612). 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. No comments were received from either notice.

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.***

While there are no assurances of confidentiality, information provided by individuals will be protected from disclosure to the extent appropriate under the applicable provisions of the Freedom of Information Act and the Privacy Act of 1974. Personal data will be collected and maintained in accordance with the Privacy Act. A Privacy Impact Assessment (PIA) update of DHS/TSA/PIA-019 Air Cargo Security Program is being completed to include the new population of screeners (canine and canine certifiers). PIA coverage is also provided by DHS/TSA/PIA-020 Security Threat Assessment for Airport Badge and Credential Holders. The applicable TSA system of records notice (SORN) is DHS/TSA-002, Transportation Security Threat Assessment System, last published in the *Federal Register* on August 11, 2014 (79 FR 46862).

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 will not ask any questions of a sensitive or private nature.

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

In the following, TSA describes the expanded respondent population and presents a summary of each of the information collections covered by this ICR.

APPLICATIONS

CCSF Applications

Applicants seeking certification to be a cargo screening facility under 49 CFR part 1549 send TSA an application for consideration. TSA estimates an average annual number of CCSF applications to be 60. TSA estimates that each CCSF application requires three (3) hours to complete, resulting in an annual hour burden of 180 hours. TSA assumes CCSF applications are completed by a first-line supervisor with a fully-loaded⁶ hourly wage rate of \$45.18⁷, for an annual hour burden cost of \$8,132. Table 1 summarizes these estimates.

Table 1. Hour Burden and Costs for CCSF Applications

Annual Number of Applications	Hour Burden per Application	Total Annual Hour Burden	Annual Hour Burden Cost
A	B	C = A x B	D = C x \$45.18
60	3	180	\$8,132

Note: Calculations may not be exact due to rounding.

CCSF-K9 Provider Applications

As with CCSFs, CCSF-K9 applicants (providers) seeking certification to screen cargo send TSA an application for consideration. TSA estimates that 3 CCSF-K9 providers will apply annually.⁸ TSA estimates that a CCSF-K9 application will take 3 hours to complete, resulting in an average

⁶ A fully-loaded wage rate includes non-salary costs of employer cost of employee compensation, such as health and retirement benefits.

⁷ The unloaded wage rate for an Aircraft Cargo Handling Supervisor is \$29.86. Bureau of Labor Statistics (BLS). May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-1011 Aircraft Cargo Handling Supervisors. Last modified March 30, 2018 (accessed August 1, 2018), https://www.bls.gov/oes/2017/May/naics3_481000.htm. TSA calculates a load factor to increase the unloaded wage to account for non-wage compensation. TSA calculates this factor by dividing the total compensation (\$28.40) by the wage and salary component (\$18.77) of compensation to get a load factor of 1.51305. BLS. Employer Costs for Employee Compensation - March 2018. Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers. Production, transportation and material moving occupations. Last modified June 8, 2018 (accessed August 1, 2018), https://www.bls.gov/news.release/archives/ecec_06082018.htm. The fully-loaded wage rate is calculated by multiplying the unloaded wage rate by the load factor: \$45.1798 = \$29.86 x 1.51305.

⁸ Although three respondents do not trigger the PRA threshold of "10 or more persons" TSA is including estimates within this ICR in the event more applications are received on an annual basis.

annual hour burden of 9 hours. TSA assumes these applications are completed by a first-line supervisor with a fully loaded wage rate of \$73.37,⁹ for a total annual hour cost burden of \$660. Table 2 summarizes these estimates.

3PK9-C Certifier Application

Applicants seeking certification to become a non-governmental entity that evaluates explosives detection third-party canine teams must send TSA an application for consideration. TSA estimates an annual average of 5.33 applications to be submitted.¹⁰ TSA estimates that each 3PK9-C Certifier Application will take eight (8) hours to complete, resulting in an average annual hour burden of 42.67 hours. TSA assumes the applications are completed by a security coordinator with a fully-loaded hourly wage rate of \$73.37, which translates into a total annual hour cost burden of \$3,130. Table 2 summarizes these estimates.

⁹ Market data for CCSF-K9 frontline supervisors is not readily available. As such, TSA made the following assumptions to calculate a proxy: the frontline supervisor would be equivalent to a TSA I-Band Supervisory Transportation Security Specialist (Canine). TSA assumes this frontline supervisor will work near a Cat X airport, which comprise of domestic airports with the greatest passenger volume. As such, TSA adjusts the base pay of this I-Band employee for Cat X airport locality by 24.33 percent. The annual base salary adjusted for locality pay, 24.33 percent, for the I-Band employee is \$101,278.70. TSA divides this annual salary by the number of workable hours for a Federal employee (2,087) in a calendar year to get an hourly wage rate of \$48.53. Finally, TSA multiplies this wage rate by the compensation factor of 1.512 to obtain the fully-loaded wage rate ($\$73.37 = \48.53×1.512). Note that this compensation factor corresponds to the average load factor for a civilian employee working in Production, Transportation, and Material Moving, over the December 2017, March 2018, June 2018, and September 2018 quarters. BLS. Employer Costs for Employee Compensation - Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers. Production, transportation, and material moving occupations. Last modified December 14, 2018 (accessed February 05, 2019), Employer Costs for Employee Compensation Archived News Releases: U.S. Bureau of Labor Statistics, <https://www.bls.gov/bls/news-release/ecec.htm>.

¹⁰ TSA estimates it will receive 14 (fourteen) 3PK9-C Certifier applications in Year 1. In Years 2 and 3, TSA estimates it will receive 1 application, per annum.

Table 2. Hour Burden and Costs for CCSF-K9 & 3PK9-C Certifier Applications

	Number of Applications (A)	Hour Burden per Application (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x \$73.37)
CCSF-K9 Applications Annual Average	3.00	3.00	9	\$660
3PK9-C Certifier Annual Average	5.33	8.00	42.67	\$3,130

Note: Calculations may not be exact due to rounding.

SECURITY THREAT ASSESSMENTS (STA) APPLICATIONS

CCSFs STA Applications

Certain employees of CCSFs are required to undergo a STA by TSA. TSA estimates there will be 5,785 STA applications per year. TSA estimates it takes each employee approximately 15 minutes (0.25 hours) to complete an application, for an annual hour burden of 1,466 hours. TSA uses a weighted-average fully-loaded¹¹ hourly wage rate of \$29.98¹². TSA calculates a total annual hour cost burden of \$43,354. Table 3 summarizes these estimates.

Table 3. Hour Burden and Costs for CCSF STA Applications

Annual Number of Applications	Hour Burden per Application	Total Annual Hour Burden	Annual Hour Burden Cost
A	B	C = A x B	D = C x \$29.98
5,785	0.25	1,446	\$43,354

Note: Calculations may not be exact due to rounding.

CCSF-K9 STA Applications

Covered employees working for a CCSF-K9 provider are required to undergo a STA, including a criminal history records check. The CCSF-K9 must demonstrate compliance with the requirement that their covered employees must undergo a criminal history records check. TSA has permitted these covered employees to meet the requirement by applying and receiving an STA through the TSA Pre✓[®] Application Program, an Airport Security Program 49 CFR part 1542 regulated airport with a Secure Identification Display Area badge and corresponding STA

¹¹ *Supra*.

¹² This is a weighted average (by employment) of a fully-loaded wage rate among Laborers and Freight, Stock, and Material Movers, and Air Cargo Handling Supervisors. As calculated above, the fully-loaded wage rate for Supervisors is \$45.18 (employment of 3,240). The fully-loaded wage rate for Laborers is \$25.84. The unloaded wage rate for Laborers is \$18.86 (employment of 34,190). BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-7062 Laborers and Freight, Stock, and Material Movers, Hand. Last modified March 30, 2018 (accessed August 1, 2018), https://www.bls.gov/oes/2017/May/naics3_481000.htm. As above, TSA calculates a fully-loaded wage rate by multiplying a compensation factor with the unloaded wage rate (\$28.54 = \$18.86 x 1.51305, see *Supra*). The fully-loaded wage rates are weighted by employment to calculate a fully-loaded weighted average hourly wage rate: \$29.9769 = [(\$28.54 x 34,190) + (\$45.18 x 3,240)] ÷ (34,190 + 3,240).

including CHRC, or an Aircraft Operator Security 49 CFR part 1544 operator STA that requires administration of a CHRC. Data collection burden such as application time and travel burdens would be part of the following TSA existing Information Collection Requests: TSA Pre✓[®] Application Program (1652-0059), Airport Security Program 49 CFR part 1542 (1652-0002), Aircraft Operator Security 49 CFR part 1544 (1652-0003).

While the STA application creates a corresponding information collection burden, the CCSF-K9 will need to submit information to TSA to validate their STA, the expiration of their STA and track the employees of a CCSF-K9 if their STA is revoked. TSA estimates CCSF-K9 managers will spend 15 minutes (0.25 hours) per employee providing the necessary information to TSA as well updating information on occasion. TSA estimates there will be an average of 240 STAs for CCSF-K9's and 60 hours annually multiplied by a first-line supervisor wage rate of \$73.37, for an annual cost of \$4,402. Table 4 summarizes these estimates.

3PK9-C Certifier STA Applications

3PK9-C Certifier employees must undergo and successfully complete a STA, and submit information to TSA to validate that the STA is valid and active. TSA estimates there will be an average of 58 STA submissions per year, and will take 15 minutes to submit (0.25 hours) for a time burden of 15 minutes (0.25 hours) for each STA. In total, the annual hour burden is 14.5 hours. TSA uses a fully-loaded hourly wage rate of \$73.37, which translates to a total annual hour cost burden of \$1,063.86.¹³ Table 4 summarizes these estimates.

Table 4. Hour Burden and Costs for CCSF-K9 and 3PK9-C Certifier STA Applications

Annual Average	Number of Applications (A)	Hour Burden per Application (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x \$73.37)
CCSF-K9 Provider	240	0.25	60.0	\$4,402
3PK9-C Certifier	58	0.25	14.5	\$1,063.86

Note: Calculations may not be exact due to rounding.

RECORDKEEPING

CCSFs Recordkeeping

For each employee required to undergo an STA, CCSFs must also maintain records for training, TSA-required internal audits, TSA audits and STA per the requirements of the CCSSSP. TSA estimates an average annual number of respondents to be 784 companies. TSA uses a fully-loaded hourly wage rate of averaged for CCSF employees \$23.00¹⁴ for Information Clerks.

¹³ Unlike the CCSF entities, TSA subject matter experts (SMEs) do not assume that there is an administrative assistant to conduct this record-keeping activity, therefore uses the managerial wage.

¹⁴ The unloaded wage rate for Receptionists and Information Clerks is \$15.20. BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 43-4141 Receptionists and Information Clerks. Last modified March 30, 2018 (accessed August 1, 2018), https://www.bls.gov/oes/2017/May/naics3_481000.htm. BLS. Employer Costs for Employee Compensation - March 2018. Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers. Production, transportation, and material moving occupations. Last modified June 8, 2018 (accessed August 1, 2018), https://www.bls.gov/news.release/archives/ecec_06082018.htm. The fully-

TSA estimates an annual average number of responses for training records to be 5,784. TSA estimates each response will require a time burden of .03 hours, for an annual hour burden of 174 hours and an annual hour burden cost of \$3,991.

TSA estimates an annual average number of responses for internal audits to be 935. TSA will require the respondents to conduct an internal audit and show proof of compliance. TSA estimates each response will require a time burden of 3 hours, for an annual hour burden of 2,805 hours and an annual hour burden cost of \$64,515.

TSA estimates an annual average number of responses for TSA audits to be 2,992. TSA estimates each response will require a time burden of 1 hour, for an annual hour burden of 2,992 hours and an annual hour burden cost of \$68,816.

TSA estimates an annual average number of responses for STA records to be 784. TSA estimates each response will require a time burden of 0.18 hours, for an annual hour burden of 141 hours and an annual hour burden cost of \$3,245.76.

TSA estimates an average overall annual hour burden of 6,111.64 hours for all recordkeeping requirements. TSA estimates an annual average hour cost burden to overall CCSFs at \$140,568. Table 5.A. summarizes these estimates.

Table 5.A. Hour Burden and Costs for Recordkeeping for CCSFs

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$23.
Training	5,784	.03	174	\$3,991.00
Internal Audits	935	3.00	2,805	\$64,515.00
TSA Audits	2,992	1.00	2,992	\$68,816.00
STA Records	784	.18	141	\$3245.76
Total	10,495		6,111.64	\$140,567.76

CCSF-K9 Providers Recordkeeping

For each employee required to undergo an STA, CCSF-K9 providers must also maintain records for certification events, training, internal audits, TSA audits and STAs per the requirements of the CCSP-K9 Security Program. TSA estimates an average annual number of respondents to be 7 companies. TSA uses a fully-loaded hourly wage rate of \$38.00 overall average employee cost for information submission.

TSA estimates an annual average number of responses for certification events to be 288. TSA estimates each response will require a time burden of .38 hours, for an annual hour burden of 109.44 hours and an annual hour burden cost of \$4,159.

TSA estimates an annual average number of responses for training records to be 693. TSA estimates each response will require a time burden of .03 hours, for an annual hour burden of 20.79 hours and an annual hour burden cost of \$790.

loaded wage rate is calculated by multiplying the unloaded wage rate by the load factor: \$23.99836 = \$15.20 x 1.51305.

TSA estimates an annual average number of responses for internal audits to be 1,180. TSA will require the respondents to conduct an internal audit and show proof of compliance. TSA estimates each response will require a time burden of .161 hours, for an annual hour burden of 188.8 hours and an annual hour burden cost of \$7,174.

TSA estimates an annual average number of responses for TSA audits to be 2,992. TSA estimates each response will require a time burden of .887 hours, for an annual hour burden of 2653.90 hours and an annual hour burden cost of \$100,848.40.

TSA estimates an annual average number of responses for STA records to be 240. TSA estimates each response will require a time burden of 0.18 hours, for an annual hour burden of 43.2 hours and an annual hour burden cost of \$1,641.60.

TSA estimates an average overall annual hour burden of 3,016.13 hours for all recordkeeping requirements. TSA estimates an annual average hour cost burden to overall CCSF-K9s at \$114,613.10. Table 5.B. summarizes these estimates.

Table 5.B. Hour Burden and Costs for Recordkeeping for CCSF-K9s

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$38.
Certification Events	288	.38	109.44	\$4,159.00
Training	693	.03	20.79	\$790.00
Internal Audits	1,180	.16	188.8	\$7,174.00
TSA Audits	2,992	.887	2653.904	\$100,848.40
STA Records	240	.18	43.2	\$1,641.60
Total	5,393		3016.134	\$114,613.00

Note: Calculations may not be exact due to rounding.

3PK9-C Certifier Recordkeeping

For each employee required to undergo an STA, 3PK9-C Certifier employees must maintain, certification events, audits, training, STA records and other recordkeeping requirements of the 3PK9-C Certifier Order. TSA estimates the average annual number of respondents to be 12 per year. TSA uses a fully-loaded hourly wage rate of \$73.37 overall average employee cost for information submission.¹⁵

TSA estimates an annual average number of responses for certification events to be 638. TSA estimates each response will require a time burden of .129 hours, for an annual hour burden of 82.302 hours and an annual hour burden cost of \$6,038.50.

¹⁵ Unlike the CCSF entities, TSA SMEs do not assume that there is an administrative assistant to conduct this record-keeping activity, therefore uses the managerial wage.

TSA estimates an annual average number of responses for training records to be 63. TSA estimates each response will require a time burden of .03 hours, for an annual hour burden of 1.89 hours and an annual hour burden cost of \$138.66.

TSA estimates an annual average number of responses for internal audits to be 12. TSA will require the respondents to conduct an internal audit and show proof of compliance. TSA estimates each response will require a time burden of .175 hours, for an annual hour burden of 2.1 hours and an annual hour burden cost of \$154.08.

TSA estimates an annual average number of responses for TSA audits to be 12. TSA estimates each response will require a time burden of .43 hours, for an annual hour burden of 5.16 hours and an annual hour burden cost of \$378.59.

TSA estimates an annual average number of responses for STA records to be 58. TSA estimates each response will require a time burden of 0.18 hours, for an annual hour burden of 10.44 hours and an annual hour burden cost of \$765.98.

TSA estimates an average overall annual hour burden of 101.89 hours for all recordkeeping requirements. TSA estimates an annual average hour cost burden to overall CCSF-K9s at \$7,475.82. Table 5.C. summarizes these estimates.

Table 5.C. Hour Burden and Costs for 3PK9-C Certifier Recordkeeping

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$73.37.
Certification Event	638	.129	82.302	\$6,038.50
Training	63	.03	1.89	\$138.66
Internal Audits	12	.175	2.1	\$154.08
TSA Audits	12	.43	5.16	\$378.59
STA Records	58	.18	10.44	\$765.98
Total	783		101.89	\$7,475.82

SECURITY PROGRAMS/ CERTIFIER ORDER

CCSFs Security Programs

TSA also has a number of burdens associated with the collection of information regarding a CCSF's Security Program. For each of these burdens, TSA assumes the full-loaded hourly wage rate of \$45.18 for first-line supervisors.

As discussed in the CCSF Application section, TSA estimates that 60 entities will apply for certification every year. TSA estimates a burden of 40 hours per new certification, separate from the application to become a CCSF, resulting in an annual hour burden of 2,400 hours and an annual hour burden cost of \$108,431.

Additionally, existing CCSFs must have their Security Program re-certified every three years. TSA estimates an annual average number of re-certifications to be 475. TSA estimates each re-certification to require a 3-hour time burden, for an annual hour burden of 1,425 hours and an annual hour burden cost of \$64,381.

TSA also conducts site-visits in association with certain new or re- certifications. TSA estimates it will conduct 95 site visits per year. Each site visit places a 2-hour time burden on respondent CCSFs, resulting in an annual hour burden of 190 hours and an annual hour burden cost of \$8,584.

TSA processes amendments to certain security programs by request of a regulated CCSF. TSA estimates it will receive one amendment request per year. TSA estimates each requested amendment will place a 1-hour burden on a CCSF, for an average annual hour burden of 1 hour and an average burden cost of \$45. If safety and the public interest require an amendment, TSA may amend The CCSSSP.

TSA estimates it will submit 10 amendments per year. Each amendment will take 40 hours to submit., for an annual average burden hours of 400 burden hours and an annual hour burden cost of \$18,072.

CCSFs must designate and submit the name and contact information of a security coordinator and alternate. TSA estimates there will be 60 submissions which will take 30 minutes (0.50 hours) to submit. TSA estimates the annual hour of 30 hours a year and annual cost of \$1,355.

CCSFs must report security incidents to TSA. Of all the respondents, TSA estimates it will get 15 incidents reported a year, at a 20 minutes (0.3333 hrs.) per report. TSA estimates 5 hours annually and an annual cost of \$226.

Across all CCSFs Security Program related collections, TSA estimates an annual hour burden of 4,451 and an annual average hour burden cost of \$201,096.20. Table 6 summarizes these estimates.

Table 6. Hour Burden and Costs for CCSF Security Programs

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$45.18
New Certification	60	40	2,400	\$108,431
Recertification	475	3	1,425	\$64,381
Site Visit	95	2	190	\$8,584
Program Amendment	1	1	1	\$45
TSA Issued Amendments	10	40	400	\$18,072
Security Coordinator Submissions	60	0.5	30	\$1,355
Security Incident Reports	15	0.3333	5	\$226
Total	716		4,451	\$201,096.20

Note: Calculations may not be exact due to rounding.

CCSF-K9 Provider's Security Program

TSA also has a number of burdens associated with the collection of information regarding a CCSF-K9 Provider's Security Program. For each of these burdens, TSA assumes the fully-loaded hourly wage rate of \$73.37 for security coordinators, with a first-line supervisor wage rate.

As discussed in the CCSF-K9 Application section, TSA estimates that 3 entities will apply for certification every year. TSA estimates a burden of 40 hours for a CCSF-K9 Provider to create a security program, resulting in an average annual hour burden of 120 hours and a total annual hour burden cost of \$8,804.

Similar to CCSF entities, CCSF-K9 Providers may submit amendments to their security program. TSA estimates it will process 10 amendments per year. Each amendment issued by a CCSF-K9 Provider will take 1 hour to submit, for an annual average hour burden of 10 hours and an annual hour burden cost of \$734.

If safety and the public interest require an amendment, TSA may amend the CCSSSP and CCSP-K9. TSA estimates it will submit 10 amendments per year. Each amendment will take 40 hours to submit, for an annual average burden hours of 400 burden hours and an annual hour burden cost of \$29,348

The CCSF-K9 Security Program mandates that each CCSF-K9 must designate and submit the name and contact information of a security coordinator and alternate. TSA estimates 3 new CCSF-K9 will submit the required information and it will take 30 minutes (0.5 hrs.) to submit. TSA estimates the annual hour of 2 hours a year and annual cost of \$110.

Lastly, CCSF-K9s must report security incidents to TSA. TSA estimates it will receive 15 incidents reported a year, with a time burden of 20 minutes (0.3333 hours) per report. TSA estimates a total annual hour burden of 5 hours and a total annual cost burden of \$367.

Across all CCSF-K9 Provider's Security Program related collections, TSA estimates an annual hour burden of 536.49 and an annual average hour burden cost of \$39,362.97. Table 7 summarizes these estimates.

Table 7. CCSF-K9 Security Program Hour Burdens and Costs

Activity	Number of Annual Responses (A)	Hour Burden Per Response (B)	Total Annual Hour Burden (C = A x B)	Total Annual Hour Burden Cost (D = C x \$73.37)
New Certifications	3.00	40.00	120	\$8,804
Submitting Amendments of Security Program to TSA	10.00	1.00	10	\$734
TSA Issued Amendments	10.00	40.00	400	\$29,348
Security Coordinator Submissions	3.00	0.5	2	\$110

Security Incident Reports	15.00	0.3333	5	\$367
Annual Average	41.00		536.49	\$39,362.97

Note: Calculations may not be exact due to rounding.

3PK9-C Certifier Order

There are a number of burdens associated with the collection of information regarding a 3PK9-C Certifier's Order, certification, security coordinator, security incidents. For each of these quantified information collection burdens, TSA assumes they are completed by a front-line supervisor (security coordinator) with a fully-loaded wage of \$73.37.

As discussed in the 3PK9-C Certifiers Application section, TSA estimates that 5.33 (16 divided by 3 years) entities will apply for certification every year. TSA estimates a burden of 40 hours for each new 3PK9-C Certifier's Order. This translates to an annual average of 213.2 hours, and an average annual cost burden of \$15,642.48.

Similar to CCSFs and CCSF-K9s, each 3PK9-C Certifier must designate and submit the name and contact information of a security coordinator and alternate. TSA estimates each of the 15 3PK-9 Certifier will submit the required information and it will take 30 minutes to submit. TSA estimates the annual hour burden is 2.67 hours a year and annual cost of \$196.

The 3PK9 -Certifiers must report security incidents to TSA. TSA estimates it will receive 15 incidents reported a year, with a time burden of 20 minutes (0.33 hours) per report. TSA estimates a total annual hour burden of 5 hours and a total annual cost burden of \$367.

Across all 3PK9-C Certifier Order related collections, TSA estimates an annual hour burden of 220.86 and an annual average hour burden cost of \$16,204.50. Table 8 summarizes these estimates.

Table 8. Hour Burden and Costs for 3PK9-C Certifier Order

Activity	Number of Annual Responses (A)	Hour Burden Per Response (B)	Total Annual Hour Burden (C = A x B)	Hour Burden Cost (D = C x \$73.37)
New Certifications	5.33	40.00	213.20	\$15,642.48
Security Coordinator Submissions	5.33	0.50	2.67	\$196
Security Incident Reports	15.00	0.333	5.00	\$367
Annual Average	25.66		220.86	\$16,204.5

Note: Calculations may not be exact due to rounding.

Total for CCSF, CCSF-K9, and 3PK9-C Certifier Respondents

TSA estimates the annual respondents for CCSF, CCSP-K9, and 3PK9-C Certifier to be 2,527, the total annual hour burden to be 16,189.98 hours, and the corresponding annual hour burden cost of \$580,062.45 for this information collection. Table 9 summarizes these estimates.

Table 9. Total Annual Respondents, Hour Burden and Costs for CCSFs, CCSF-K9 and 3PK9-C

Activity	Respondents	Responses	Annual Hour Burden	Annual Hour Burden Cost
Applications				
CCSF	60	60	180	\$8,132
CCSF-K9	30	3	9	\$660
3PK9-C	16	5.33	42.67	\$3,130
STA Applications				
CCSF	784	5785	1446	\$43,354
CCSF-K9	7	240	60	\$4,402
3PK9-C	16	58	14.5	\$1,063.86
Recordkeeping				
CCSFs	784	10,495	6,111.64	\$140,568.00
CCSF-K9	7	5,393	3,016.13	\$114,613.10
3PK9-C	16	783	101.69	\$7,475.82
Security Programs / Orders				
CCSF	784	716	4,451	\$201,096.20
CCSF-K9	7	41	536.49	\$39,362.97
3PK9-C	16	25.66	220.86	\$16,204.50
Total	2,527	23,604.99	16,189.98	\$580,062.45

Note: Calculations may not be exact due to rounding.

13. Provide an estimate of the total annual capital and start-up costs.

STA Fees

As described in Question 12, TSA estimates that employees from three populations – CCSSSP, 3PK9-C Certifiers, and CCSF-K9 Providers – will complete a STA for purposes of complying with the CCSSSP, CCSP-K9 Security Program and the 3PK9-C Certifier Order. TSA will permit CCSP-K9 employees and 3PK9-C Certifier employees to meet the STA with CHRC requirements found in the CCSP-K9 Security Program and 3PK9-C Certifiers Order, via other TSA vetting requirements and pay corresponding costs for those other STAs because other STAs contain a CHRC, to include a fingerprint based check.

TSA estimates a fee of \$41.00 for each CCSSSP STA. TSA assumes that it will process an average of 5,785 STAs a year from the CCSSSP population, which translates to a cost of \$237,185 collected annually. Table 10 summarizes the costs.

Table 10. STA Fee Costs for CCSF Populations

Population	Annual Number of STAs	STA Fee	STA Fee Costs
	A	B	C = A x B
CCSP STAs	5,785	\$41.00	\$237,185

Note: Calculations may not be exact due to rounding.

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 will not have been incurred without this collection of information.**

TSA Costs for CCSSSP Applications, Recertification, Security Coordinators, and Incident Reporting

TSA estimated an annual average of 535 (475 updated programs + 60 new programs) applications and security program reviews. CCSF applications and security program reviews are estimated to take an average 10 hours per entity requesting certification at a cost of \$72.72 per hour for a TSA employee. The wage is based on the average loaded hourly wage rate for an I/J band TSA employee. TSA estimated that collecting security coordinator information and responding to security incident would involve 30 minutes (0.5 hours) and 10 hours, respectively. TSA hours for these responses would be 5,530 annually and cost \$402,125. Table 11 summarizes these calculations.

Table 11. Federal Costs for CCSSSP Review

Activity	Number of Responses	Hour Burden per Response	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$72.72
New CCSSSP Program	60	10	600	\$43,630
Recertification	475		4,750	\$345,406
Security Coordinator Submissions	60	0.5	30	\$2,182
Security Incident Reporting	15	10	150	\$10,908
Total			5,530	\$402,125

TSA Costs for CCSF-K9 Applications, Security Coordinators, and Incident Reporting

TSA estimated an annual average of three CCSF-K9 applications. CCSF-K9 are estimated to take an average 10 hours per entity requesting certification at a cost of \$72.72 per hour for a TSA employee. The wage is based on the average loaded hourly wage rate for an I/J band TSA employee. TSA estimated that collecting security coordinator information and responding to security incident would involve 30 minutes (0.5 hours) and 10 hours, respectively. TSA hours for these responses would be 182 annually and cost \$13,198. Table 12 summarizes these calculations.

Table 12. TSA Cost for CCSF-K9 Applications, Security Coordinators, and Incident Reporting

Annual Burden	Number of CCSF-K9 Responses	Hour Burden per Response	Annual Hour Burden	Hour Burden Cost
	(A)	(B)	(C = A x B)	(D = C x \$72.72)
Applications	3	10	30	\$2,182
Security Coordinator Submissions	3	0.5	2	\$109

Security Incident Reporting	15	10	150	\$10,908
Total Annual Average			182	\$13,198

TSA Costs for 3PK9-C Certifier Applications, Security Coordinators, and Incident Reporting

TSA must review each 3PK9-C Certifier application. TSA predicts it will review an average of 5.33 applications, annually. Each 3PK9-C Certifier application is estimated to take 1.5 hours, for an average annual hour burden of 8 hours (24 hours over three years). The average loaded hourly wage rate for TSA employees to review each application is \$79.23.¹⁶ For security coordinator submissions and incident reports, TSA estimates a cost of \$72.72 per hour for a I/J band TSA employee, for collecting security coordinator information and responding to security incident reports at 30 minutes (0.5 hours) and 10 hours, respectively. The corresponding total annual hours are 161 and annual cost burden is \$11,735. Table 13 summarizes these estimates.

Table 13. TSA Costs for 3PK9-C Certifier Applications, Security Coordinators, and Incident Reporting

Year	Number of 3PK9-C Responses	Hour Burden per Response	Total Hour Burden	Annual Hour Burden Cost
	(A)	(B)	(C = A x B)	(D = C(Applications) x \$79.23)
Applications	5.33	1.50	8.00	\$634
	(A)	(B)	(C = A x B)	(D = C(SC Submissions or Incidents) x \$72.72)
Security Coordinator Submissions	5	0.5	3	\$194
Security Incident Reporting	15	10	150	\$10,908
Total Annual Average			161	\$11,735

Note: Calculations may not be exact due to rounding.

STA Application Review

TSA must review every STA application it receives. As previously stated in Question 13, TSA estimates the time it takes to process 298 CCSF-K9 and 3PK9-C Certifiers STA applications a year, with each review taking 15 minutes (0.25 hours). The fully-loaded wage of the TSA employee reviewing these STAs is \$72.72.¹⁷ The annual total hour burden for these reviews is 74.5 hours. This corresponds to a total annual hour burden cost of \$5,417. Table 14 summarizes the estimated number of STA reviews by population, and the corresponding time and cost burdens of these reviews.

¹⁶ TSA estimates that three different TSA employees -- an I-band, J-band, and L-band -- will review each 3PK9-C Certifier application. Each will spend 30 minutes (0.5 hours) review the document, for a total of 1.5 hours to review an application. The wage rate used is a weighted average of the three employees: $\$79.23 = [(\$66.79 \times 1) + (\$78.65 \times 1) + (\$92.24 \times 1)] \div (3)$.

¹⁷ This is an average of the fully-loaded wages for an I-band employee (\$66.79 an hour) and J-band employee (\$78.65), where $[\$72.72 = (\$66.79 + 78.65) \div (2)]$. TSA assumes that both I-band and J-band employees will be reviewing these STA applications.

Table 14. Hour Burden and Costs for CCSF-K9 and 3PK9-C Certifiers STA Review

Population	Number of STA Applications Received (A)	Hour Burden per Application (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x \$72.72)
CCSF-K9	240	0.25	60.00	\$4,363
CCSP-3PK9-C Certifiers	58		14.50	\$1,054
Total	298		74.50	\$5,417

Note: Calculations may not be exact due to rounding.

Annual Audit of CCSFs, CCSF-K9s and 3PK9-C Certifiers

As stated in Question 12, TSA will audit each CCSFs, and CCSF-K9s and 3PK9-C Certifier, annually. This translates to 12 audits a year per each entity, with each audit taking 8 hours for TSA to complete ($12 * 3 = 36 * 8 = 288$). The fully-loaded wage rate of the TSA employees conducting the audits is \$72.72. The total annual hour burden is 288 hours. This corresponds to a total annual hour burden cost of \$20,943.36. Table 15 summarizes these estimates below.

Table 15. Hour Burden and Costs for CCSFs, 3PK9-C Certifiers and CCSF-K9s (Annual) Audit

	Number of Audits	Hour Burden Per Audit	Total Hour Burden	Annual Hour Burden Cost
Annual Average	(A)	(B)	(C = A x B)	(D = C x \$72.72)
TSA Audits	36	8	288.00	\$20,943.36

Note: Calculations may not be exact due to rounding.

TSA Issued Amendments for the CCSSSP and CCSP-K9

If safety and the public interest require an amendment, TSA may amend the CCSSSP and CCSP-K9. TSA estimates it will submit 10 amendments per year for each entity. Each amendment will take 40 hours to submit ($10 * 2 = 20 * 40 = 800.00$). The fully-loaded wage of the designated TSA employee submitting said amendment is \$72.72. The total annual hour burden is 800 hours, and will cost TSA a total annual hour burden cost of \$58,176.00. Table 16 summarizes these estimates below.

Table 16. Hour Burden and Costs for TSA Issued Amendments for the CCSSSP, and 3PK9-C Program

	Number of Amendments	Hour Burden per Amendment	Total Hour Burden	Hour Burden Cost (D = C x \$72.72)
Annual Average	(A)	(B)	(C = A x B)	(D = C x \$72.72)
TSA Issued Amendments	20.0	40.00	800.00	\$58,176.00

TSA Total Costs

TSA estimates a total Federal Government cost of \$511,594.36, and 7,035 hours, as summarized by Table 17 below.

Table 17. Total TSA Costs

TSA Costs	Annual Hours	Annual Costs
CCSF Applications, Recertifications, Security Coordinators, and Incident Reporting	5,530	\$402,125
CCSF-K9 Applications, Recertification, Security Coordinators, and Incident Reporting	182	\$13,198
3PK9-C Certifier Applications, Recertification, Security Coordinators, and Incident Reporting	161	\$11,735
STA Review for CCSFs, CCSF-K9 and 3PK9-C Certifiers	74.50	\$5,417
Annual Audit of CCSF, CCSF-K9, and 3PK9-C Certifier	288	\$20,943.36
TSA Issued Amendments for the CCSSSP and CCSF-K9 Program	800	\$58,176.00
Annual Total TSA	7,035.50	511,594.36

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

TSA revised the number of CCSFs to account for current enrollment and the types of facilities that may enroll in the future. TSA also added the associated hours and burden costs for the inclusion of the CCSF-K9 program and 3PK9-C Certifiers Order.

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 will 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.