

INFORMATION COLLECTION SUPPORTING STATEMENT CERTIFIED CARGO SCREENING PROGRAM PILOT

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 (PL 110-53)(August 2007) requires TSA to develop a system to screen 50 percent of the cargo transported on a passenger aircraft by February 2009 and to screen 100 percent of all such cargo by August 2010. TSA is conducting a Certified Cargo Screening Program (CCSP) pilot to begin to implement this statutory requirement. Under the pilot program, TSA will certify all qualified facilities as Certified Cargo Screening Facilities (CCSFs) as part of the Certified Cargo Screening Program (CCSP). 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 operators and foreign air carriers. A subset of CCSFs will provide data for the evaluation of cargo screening technology effectiveness until August 2010. The pilot creates the following new information collections:

(1) **CCSF Applications.** Require any entity that wishes to become a CCSF to submit an application to TSA;

(2) **STA Information.** Require the appropriate CCSF individuals and representatives authorized to perform screening functions to provide information TSA needs to conduct security threat assessments (STAs) and other name-based checks on these individuals. This is a previously approved collection under OMB control number 1652-0040, but this ICR expands the population from whom the information is collected;

(3) **Recordkeeping.** Require CCSFs to maintain screening and other security-related records.

(4) **Cargo Reporting.** Require CCSFs to provide information on the amount of cargo screened and other screening metrics at an approved facility;

Collections (1) and (2) are necessary for TSA to determine whether entities are qualified to screen cargo to TSA's standards and to conduct checks on individuals to make sure that they do not pose a security threat. Collections (3) and (4) are necessary for TSA to determine whether CCSFs are performing in accordance with TSA's requirements and to evaluate the effectiveness of screening technologies.

TSA is concurrently submitting an ICR for an Interim Final Rule (IFR) that will implement the air cargo requirements of the 9/11 Commission Act of 2007. TSA anticipates that the entities that have made a business decision to participate in the pilot program will become regulated entities once the IFR is effective. These collections will continue once the IFR is effective, and thus they are also identified as part of the IFR ICR.

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.***

Pilot Requirements Included in This Information Collection Request (ICR):

(1) **CCSF Applications.** Require any entity that wishes to become a CCSF to submit an application to TSA at least 90 days before the intended date of operations. See TSA forms 419 B, D, and E.

(2) **STA Information.** Require the appropriate CCSF individuals and representatives authorized to perform screening and other functions to provide personal information to TSA. TSA will use the information to conduct STAs and other name-based checks. Once these individuals have successfully completed an STA conducted by TSA, they may screen cargo to be transported on passenger aircraft and perform related functions. See TSA form 419 F.

(3) **Recordkeeping.** Require CCSFs to maintain screening and other security-related records. TSA needs to be able to review these training records for the reasons specified in item 1, above. (Note: No TSA form)

(4) **Cargo Reporting.** Require CCSFs to provide information on the amount of cargo screened at an approved facility and other cargo screening metrics. TSA requires this information in order to evaluate the performance of the CCSFs for the pilot, to evaluate screening technologies, to ensure that the mandates of the 9/11 Act are being met, and to provide information needed for future rulemaking relating to air cargo security. (Note: No current TSA form)

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 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. Thus, this collection is in compliance with the Government Paperwork Elimination Act for recordkeeping. CCSF applicants will submit applications and related information required under the pilot either electronically through email or through the Air Cargo Data Management System (ACDMS), which is now under development. TSA will also accept applications by mail. TSA will use the ACDMS as a repository of information on the certified facilities participating in the CCSP to support the application process and the STA application and review process. Once ACDMS is functional, this collection will be in compliance with the Government Paperwork Elimination Act for reporting.

- 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.**

Certain individuals have already undergone STAs and TSA will not require them to undergo another one for this program. TSA will not require individuals who have any of the following current credentials to obtain another STA for the pilot:

- (1) A State-issued commercial driver's license with a current hazardous materials endorsement;
- (2) A Transportation Worker Identification Credential issued in accordance with the final rule on Transportation Worker Identification Credential Implementation in the Maritime Sector;
- (3) A Free and Secure Trade (FAST) card issued by U.S. Customs and Border Protection under the FAST Program; or,
- (4) Another STA approved by TSA as comparable to the STA TSA requires.

- 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 CCSP pilot provides a way for the air cargo industry to meet the congressionally-mandated requirements to screen 50% of all cargo transported on passenger aircraft by February 2009, and eventually 100% of all air cargo by August 2010. The information collections described are inherent to the CCSP program. If this information collection is not conducted, TSA may not be in compliance with its statutory mandate to secure the Nation's transportation systems and the security of cargo and persons transported on passenger aircraft will be compromised.

- 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).**

For individuals required to undergo an STA (for example, an individual authorized to perform screening, or with unescorted access to cargo), TSA will notify 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 will be required to retain this notification for 180 days after the employee has separated from the company.

- 8. Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

TSA is in continuous dialogue with potential CCSF applicants and industry stakeholders, and TSA issued a notice of this collection of information through a 60-day notice published in the Federal Register on April 13, 2009 (74 FR 16879, April 13, 2009). TSA did not receive any comments in response to this 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.**

TSA will not provide any assurances of confidentiality. TSA will protect information provided by individuals from disclosure to the extent appropriate under the applicable provisions of the Freedom of Information Act and the Privacy Act of 1974. TSA will collect personal data and transmit it in accordance with the Privacy Act.

- 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 burden of the collection of information.**

In this justification, TSA describes the expanded respondent population and then presents a summary of each of the information collections covered by this ICR. TSA estimates that it will receive approximately 2,000 CCSF enrollment applications, of which 75%, or 1,500 applicants, will actually become certified locations. TSA anticipates most of the 1,500 CCSF entities will enroll within the first year.

Table 1: Respondent Summary

Respondent Category	Total Unique Respondents
CCSF Entities	1,500
Total	1,500

Information Collections

TSA has identified four separate information collections under this ICR. These four collections will affect an estimated total of 1,500 unique respondents during the Pilot, which is expected to last one year. Collectively, these four information collections represent an estimated total average of 186,452 responses, for a total average hour burden of 113,103 hours. Table 2 provides a summary of TSA's estimates for these collections. The following paragraphs provide a general description of each collection and the basis for TSA's estimate.

Table 2: CCSP Pilot Information Collection and Hour Burden Summary

Information Collection	Annual Respondents Year 1	Total Average Annual Responses Year 1	Total Average Annual Hour Burden Year 1
CCSF Enrollment Application (One time Collection)	2,000	2,000	4,000
CCSF STA Applications (Collected every five years after initial application.)	1,500	82,500	20,625
Cargo Reporting (Monthly collection)	1,500	18,000	78,000
CCSP Subset (Monthly Collection)	121	1,452	3,630
Maintain Training Records (Continuous as needed)	1,500	82,500	6,848
Total		186,452	113,103

CCSF Applications. Firms desiring to become CCSFs will send TSA an application for consideration. The application will require basic profile information and supporting documentation demonstrating that the firm satisfies the specified credentials. TSA estimates that it will receive 2,000 enrollment applications and that these applications will require an average of 2 hours each to complete, resulting in a burden of 4,000 hours (2,000 X 2).

Security Threat Assessment Applications. CCSF participants will be required to have certain employees undergo STAs. TSA estimates a total of 1,500 CCSFs responding with an average of 55 STA applicants each. This yields an estimated 82,500 (1,500 X 55) STAs for CCSFs. TSA estimates the time to complete an STA application at 15 minutes per individual. The total hour burden is 20,625 hours (82,500 X 0.25).

Cargo Reporting. TSA estimates that approximately 1,500 CCSFs and airlines will complete monthly cargo volume reports taking approximately one hour per week. The total estimated average annual responses, based off one response per firm per month, are 18,000. The total estimated hourly burden each year is approximately 78,000hours (1,500X 1 X 52). For the subset of CCSFs who will report data on the evaluation of screening technologies, the

burden is 2.5 hours per month until August 2010. The average annual response per location per month is 1,452 (121x12). The estimated total annual hourly burden is 3,630 (1,452x2.5).

Record Keeping. All CCSFs will be required to maintain screening and other security-related training records for employees in the program. TSA estimates a time burden of approximately five minutes (0.083 hours) per employee for each CCSF to file the training records, and other records of compliance, resulting in a total of 82,500 record updates. TSA estimates that the number of CCSFs impacted by this collection is 1,500. From this, TSA derives an annual hour burden of approximately 6,848 hours (82,500 X 0.083).

The annual costs of the pilot, if it extends beyond the one-year assumed above, are outlined in Table 3 below.

Table 3: Recurring Pilot Hour Burden Summary

Information Collection	Annual Respondents	Total Average Annual Responses	Total Average Annual Hour Burden
Cargo Reporting	1,500	18,000	78,000
Maintain Training Records	1,500	82,500	6,848
Total		100,500	84,848

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

There are no industry costs estimated, beyond the hourly burden, for this collection.

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 estimates the total cost to the Federal Government associated with the information collections identified in this request amounts to \$3.1 million. Table 4 shows TSA costs for information collections associated with each of these respondents. More detailed information about how TSA estimated these costs is provided below.

Table 4: TSA Costs to Process Information Collections

Respondent Category	Average Collection Cost Year 1	Previous Annual Cost	Net Additional Annual Cost
Security Threat Assessments	\$1,402,500	\$0	\$1,402,500
Assessments & Reports	\$413,100	\$0	\$413,100
CCSF Application Review	\$826,200	\$0	\$826,200
Inspections	\$337,080	\$0	\$337,080
ACDMS Personnel	\$170,186	\$0	\$170,186
Total	\$3,149,066	\$0	\$3,149,066

Security Threat Assessment Applications. TSA costs to process STAs are equal to the \$17 STA fee for the entire population of STAs needed. As of now, there is no rule that requires CCSFs to pay for STAs, so TSA will assume the burden for these costs during the pilot. For the estimated total 82,500 STAs estimated above, the average cost burden to TSA is \$1,402,500 (82,500 X \$17).

Assessments and Reports. TSA Principal Cargo Security Analysts (PCSAs) will be required to assess each facility that has applied to be a CCSF. PCSAs will assess CCSFs as their security programs are processed. TSA estimates it will take individual PCSAs four hours to conduct a physical inspection of the facility and write an assessment report. TSA estimated this requirement would result in 1,500 assessment reports being completed, at a cost of \$68.85 per hour for a TSA field employee resulting in a cost of approximately \$413,100 (1,500 X \$68.85 X 4).

CCSF Application Review. TSA estimates that it will take a Principal Cargo Security Analyst (PCSA) eight hours to review each application submitted by a CCSF applicant, and determine whether the applicant should be certified as a CCSF. At a TSA employee wage rate of \$68.85 per hour for an average of 1,500 assessments fully processed, TSA's review of the facilities will cost an estimated \$826,200 (1,500 X 8 X \$68.85).

Inspections. TSI-Cs will be required to conduct annual inspections of firms that are participating in the pilot. TSA estimates that it will take individual TSI-Cs four hours to inspect a CCSF, at a cost of \$56.18 per hour for a TSA field employee, resulting in an annual cost of approximately \$337,080 (1,500 X \$56.18 X 4).

Air Cargo Data Management System (ACDMS). TSA will develop a computerized management system to govern CCSP. This system will require the labor of two full-time equivalents (FTEs), at a cost of \$85,093 per year for each FTE. This salary is equivalent to a SV G band employee. Therefore, TSA estimates the costs involved in the ACDMS relevant to the PRA to be \$170,186 (2 X \$85,093) per year.

The annual costs of the pilot, if it extends beyond the one-year assumed above, are outlined in Table 5 below.

Table 5: Recurring Annual TSA Costs

Respondent Category	Average Annual Collection Cost	Previous Annual Cost	Net Additional Annual Cost
Inspections	\$337,080	\$0	\$337,080
ACDMS Personnel	\$170,186	\$0	\$170,186
Total	\$507,266	\$0	\$507,266

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

This is a new ICR.

- 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.