

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **General Aviation Airport Threat and Vulnerability Assessment**

- 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 1617(k)(1) of the Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. 110-53, 121 Stat. 266, 488, Aug. 3, 2007) requires that the TSA Administrator develop a standardized threat and vulnerability assessment program for general aviation airports and implement a program to perform such assessments on a risk-management basis at general aviation airports. The program gives airport operators a tool for measuring their current security standards. The collection will consist of several elements: (1) a security self-assessment that the general aviation airport operators can perform on their airport using a set of guidelines provided by the TSA, which are available to the public on the TSA web site (<https://www.tsa.gov>); (2) a short series of questions; and (3) a field wherein responders can measure security related concerns. The questions addressed in this Supporting Statement will provide data to complete the program required by the Recommendations of the 9/11 Commission Act of 2007.

The collection will consist of several elements: (1) a security self-assessment that the general aviation airport operators can perform on their airport using a set of guidelines provided by TSA (available to the public on the TSA Web site); (2) a short series of “yes” or “no” questions; and (3) a narrative field wherein responders can expand on matters of concern to them.

- 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.**

Section 1617(k)(2) of the same Act requires the TSA Administrator to initiate and complete a study of the feasibility of a risk-managed program of general aviation airports for projects to potentially assist with upgrading airport security if funding becomes available. TSA proposes that the information collected will assist TSA in measuring the current vulnerabilities of GA airports and will not be used as an enforcement or compliance tool. The assessment data will also provide necessary background information and context for the development of security measures/policies, with industry stakeholder input, that are reasonable and feasible to implement (e.g. feasibility for a future GA funding assistance mechanism as it becomes available to TSA).

- 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.]**

In compliance with GPEA, respondents will provide information electronically via TSA's web site at <https://www.tsa.gov>. The survey was created using a specialized web survey tool, which is located in a secured network environment and fully certified and accredited. An airport operator, manager, or security coordinator will be able to access the assessment electronically via TSA's Web site. The user will go to the web site, enter contact information, and answer a series of questions. The user will then click "submit" to upload the survey. The survey scores will be compiled and analyzed by the highly reputable National Safe Skies Alliance (NSSA) under contract with TSA. NSSA will provide the results to TSA for future use, for example, in examining the 'as-is' and potential 'to-be' security posture of large public-use GA airports.

- 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.**

The requested information is not collected in any form, and therefore is not duplicated elsewhere. The Federal Aviation Administration (FAA) tracks data pertaining strictly to airport/runway safety. This TSA collection pertains to airport security and the current security vulnerabilities at general aviation airports throughout the country.

- 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 of information 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.**

Section 1617(k)(1) of the Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. 110-53, 121 Stat. 266, 488, Aug. 3, 2007) requires that the TSA Administrator develop and implement a standardized threat and vulnerability assessment program. The TSA will not be able to meet its obligations to the 9/11 Commission Act and Congress if the information described in this Supporting Statement is not collected.

- 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).**

None of the requirements are inconsistent with the guidelines in 5 CFR 1320.5.

- 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's general aviation stakeholders, including several trade associations participated in the development of this assessment. The survey was created based on the recommendations of this collaborate team. The GA stakeholders were supportive of the survey, because they had an input designing the security measures at each and every airport that fell within the criteria. In addition, the stakeholders were able to reach out to airport operators and collect the necessary feedback for the TSA to establish the survey.

In accordance with 5 CFR 1320.5, TSA published a notice for public comment in the Federal Register (73 FR 32345) on June 6, 2008. TSA received three comments. Two commenters expressed concern that the assessment results be protected from public disclosure. TSA's response was to assure the commenters that TSA would not release the results unless the results were requested by Congress or airport aviation officials in their respective states. TSA also informed the commenters that the survey responses are protected as Sensitive Security Information (SSI) in accordance with 49 U.S.C. 114(r) and 49 CFR Part 1520, and therefore are not subject to public disclosure.

A third responder expressed support of the assessment, saying the survey would benefit the GA community by establishing security standards and corrective actions for airport operators, and by providing guidelines for security threat assessment. TSA responded to all three commenters appropriately.

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

There is no offer of monetary or material value for this information collection.

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

The results of this assessment are SSI under 49 CFR 1520.5(b)(5), Vulnerability Assessments, and will thus be protected as such under part 1520 requirements.

**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.**

This information collection does not involve any questions of a sensitive nature..

**12. Provide estimates of hour burden of the collection of information.**

The information TSA seeks should be readily available to the airport operators and should take no more than 20-30 minutes to collect and submit. Each airport operator will need to log on to a Web site hosted by TSA (2 minutes), complete the assessment (17-27 minutes), and submit the results (1 minute), for a total time burden of 20-30 minutes. Therefore, based on the total number of general aviation airport operators expected to participate and the approximate estimated time for each to complete and submit the survey questionnaire, the approximate total burden to the public should not exceed 1,500 hours (3,000 airport operators X 30 minutes).

Total Number GA Airports	Airport Operator log-in	Complete Assessment	Submit Survey	Time Burden
	2 minutes	17-27 minutes	1 minute	20-30 minutes
3000				3000 x 30 minutes
				<b>1,500 hours</b>

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

There is no cost burden to respondents as a result of 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 would not have been incurred without this collection of information.**

The entire cost of the project to the Federal Government is \$450,000. This cost includes survey development/modification, marketing, promotion, data analysis, and culmination of data into the final report.

**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 collection so there are no changes or adjustments.

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

**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.