

INFORMATION COLLECTION SUPPORTING STATEMENT

Transportation Security Officer (TSO) Medical Questionnaire

OMB No. 1652-0032

- 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).**

TSA is requesting approval to renew this collection of information to comply with Section 111 of the Aviation and Transportation Security Act (ATSA) codified at 49 U.S.C. § 44935, which requires TSA to establish qualification standards for the employment of security screening personnel. With approval from OMB, TSA currently collects information via a Transportation Security Officer (TSO) Medical Questionnaire and further evaluation forms. During the rapid hiring of Transportation Security Screeners in 2002 and until summer 2004 TSA used the SF-93, Report of Medical History, as the collection technique to ensure candidates under employment consideration for Transportation Security Officer positions met the qualification standards to successfully perform the functions of the position as described above. With OMB approval, TSA began using the Security Officer Medical Questionnaire (SOMQ) instead of the SF-93. TSA has found the SOMQ form, in conjunction with further evaluation forms as needed, more suitable as it collects the information necessary to assist the health care providers in making determinations regarding applicants' medical and physical abilities to successfully perform the job without being overly intrusive.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

This collection of information assists the agency in meeting its statutory obligation under ATSA to ensure that no individual serves as a TSO who does not "possess basic aptitudes and physical abilities, including color perception, visual and aural acuity, physical coordination, and motor skills." 49 U.S.C. § 44935(f)(1)(B). Information is collected through a medical questionnaire and further evaluation forms. TSA deems this collection necessary to evaluate a candidate's current and past medical history, including visual and aural acuity, physical coordination, and motor skills to be able to: (a) distinguish on screening equipment monitors the appropriate imaging standard; (b) distinguish each color displayed on every type of screening equipment and explain what each color signifies; (c) hear and respond to the spoken voice and to audible alarms in an active checkpoint environment; (d) perform physical searches by efficiently and thoroughly manipulating and handling baggage containers, and other objects; (e) perform pat-downs or hand-held metal detector searches of individuals with sufficient dexterity and capacity to thoroughly conduct the procedures over an individual's entire body; and (f) demonstrate a daily fitness for duty without impairment due to illegal drugs, sleep deprivation, medication, or alcohol.

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

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]**

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

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.**

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

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

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

6. ***Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.***

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

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

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

TSA invited public comment on this information collection requirement, a 60-day notice was published in the Federal Register on December 30, 2011 (76 FR 82313) and a 30-day notice was published on March 14, 2012, (77 FR 15114). TSA received no comments in response to the notices.

In 2004, TSA consulted Human Performance Systems Inc. in job-related medical standards and applicant medical suitability determinations in developing this collection technique.

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

TSA will not provide any payment or gift to respondents.

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

TSA will maintain the information according to the Privacy Act, OPM/GOVT-10 System, Employee Medical File of Records of TSO candidates who are hired, or under the OPM/GOVT-5, Recruiting, Examining, and Placement System of Records of TSO candidates who are not hired. TSA will maintain the information in a secured area with access limited to authorized personnel who have a business need to know the information.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

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

Based on historical completion rates we estimated the hour burden based on the following logic:

- Questionnaire: There are an estimated 14,750 applicants who complete the SOMQ annually.
 - It takes approximately 40 minutes to complete, therefore would result in a burden of 9,833 hours.
- Further evaluation: Of the estimated 14,750 applicants, on average 4,425 applicants will need to complete at least one further evaluation form. Additionally, an average of 7,390 health care providers will complete further evaluation forms
 - Not all applicants will be required to complete the further evaluation further evaluation forms; some applicants need to complete multiple forms whereas others only need to complete one form. On average, applicants required to complete additional forms will need to complete 1.67 further evaluation forms per person. Because the issue or issues for which an applicant must undergo further evaluation may fall into different specialty areas, TSA estimates applicants would need to visit approximately 1.67 health care providers.
 - For the estimated 4,425 applicants required to complete additional forms, it should take them each approximately 5 minutes to complete their section of the form(s) resulting in an estimated burden of 616 hours (4,425 X 1.67 forms X 5 min / 60 min per hour).
 - For the estimated 7,390 health care providers TSA assumes applicants required to complete additional forms would need to visit (4,425 X 1.67), it should take them each approximately 20 minutes to complete their section of the form(s) resulting in an estimated burden of 2,463 hours (7,390 X 20 min/60 min per hour).
 - This would result in an estimated total further evaluation burden of 3,079 hours.
- Therefore, the current estimated annual reporting burden for the entire information collection is 12,912 hours.

Therefore, TSA estimates approximately 26,565 responses [14,750 SOMQ +4,425 (applicant FE)+7,390 (health care providers responding)]. These numbers have been adjusted from the 60 Day Notice to reflect updated data.

Population	Hours
14,750 applicants complete TSO Medical Questionnaire	9,833
4,425 applicants complete the Further Evaluation Form(s)	616
7,390 health care providers complete the Further Evaluation Form(s)	2,463
Total Burden	12,912 hours

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 the candidates for completing the initial medical questionnaire, since the evaluation is completed by TSA. There is an unknown cost associated with the completion of any required further evaluation forms that would vary depending on how many forms that need to be completed and the candidate's type of insurance/insurance co-pay.

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 estimated annual operating costs from our previous provider include the following:

- Assessment team medical personnel to review and process the SOMQ and Further Evaluation Forms (FE) (\$2,397,204).
- Storage costs associated with the SOMQ and FE forms (\$4,860).
- Shipping costs from the health care provider sites to the review location and then to the storage facility (\$147,420).
- Training for health care personnel to collect/review SOMQ and FE forms (\$6,757)

Therefore, TSA estimates the total annual costs to the Federal Government as a result of this information collection to be \$2,556,241.

Activity	Cost
Assessment team health care personnel to review and process the SOMQ and FE forms	\$2,397,204
Storage costs associated with the SOMQ and FE forms	\$4,860
Shipping costs from the medical provider sites to the review location and then to the storage facility	\$147,420
Training for medical personnel to collect/review SOMQ and FE forms	\$6,757
Total	\$2,556,241

**Note. TSA has recently changed prime contractors for this service; however, the same sub-contractor is still in place. The estimates above are from the prior prime contractor because TSA still has not reached steady state with the new vendor and the current budget estimates are not stable enough to provide a baseline.*

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

There are no changes to the information being collected.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

TSA will not publish the information collected.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

TSA is not seeking such approval and will display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

TSA is not seeking any exceptions to the certification statement identified in Item 19, OMB Form 83-I, Certification for Paperwork Reduction Act Submissions.