INFORMATION COLLECTION SUPPORTING STATEMENT

Transportation Worker Identification Credential

Last Updated: 2/22/13

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 developed the Transportation Worker Identification Credential (TWIC) program to mitigate threats and vulnerabilities in the national transportation system. The TWIC is a biometric credential that can be used as an identification tool for workers in various segments of the national transportation system. Before issuing an individual a credential, TSA performs a security threat assessment (STA), which requires TSA to collect certain personal information such as name, address, fingerprints and other information.

    The program implements authorities set forth in the Aviation and Transportation Security Act (ATSA) (Pub. L. 107-71; Nov. 19, 2002; sec. 106), the Maritime Transportation Security Act of 2002 (MTSA) (Pub. L. 107-295; Nov. 25, 2002; sec. 102), and the Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users (SAFETEA-LU) (Pub. L. 109-59; Aug. 10, 2005; sec. 7105), codified at 49 U.S.C. 5103a(g).

    TSA and the U.S. Coast Guard issued a joint Notice of Proposed Rulemaking (NPRM) on May 22, 2006. After consideration of public comment on the NPRM, TSA issued a joint Final Rule (FR) with the Coast Guard on January 25, 2007 applicable to the maritime transportation sector that would require this information collection.

    As described in the FR, TSA requires this collection of information from TWIC applicants in order to perform an STA on those individuals requiring unescorted access to secure areas of vessels and maritime facilities. Included in this population are commercial drivers licensed in Canada or Mexico who are applying for a TWIC in order to transport hazardous materials in accordance with 49 CFR 1572.201 and not necessarily to access secure areas of a facility or vessel. The information collected is the minimum amount required to establish the identity of the individual and to perform the various background checks required by MTSA. Data is collected during an optional pre-enrollment step and at the time of in-person enrollment. Among the records checks required by MTSA are a criminal history records check (CHRC), a check of intelligence databases, and an alien status check. There are also some worker populations in the non-maritime environment who may be authorized/required by TSA to obtain a TWIC given the nature of their work and required access to controlled areas/facilities. These individuals would be required to complete the same enrollment process as the TWIC-maritime population.

    Also, TSA conducts an optional survey to capture applicants' overall customer satisfaction with the enrollment process. TSA's contractor conducts the survey and compiles the results (see Part B).

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.***

   TSA uses the information provided by applicants to verify the identity of the individual applying for a TWIC and to perform a comprehensive STA to determine if the individual poses a security threat that would preclude issuance of a TWIC. TWIC applicants are required to submit their fingerprints and other biographical data at enrollment centers designated by TSA, such as contact information to include a phone number or email address, in order to notify the applicant when their TWIC is available to be picked up and activated. The fingerprint data is used to conduct a CHRC using the FBI's Integrated Automated Fingerprint Identification System. The biographical data is used to perform checks against terrorist watch lists, as well as searches against immigration databases in the cases of aliens as defined by the Immigration and Nationality Act. Once the background assessment is complete and it has been determined that the applicant does not pose a security risk, TSA issues a TWIC with the individual's name and photograph printed on it, which the applicant will be required to pick up and activate at the enrollment center that is specified by the applicant during the enrollment process.

   Biometric data is securely stored on the credential using integrated circuit chips. Storing this data on the credential enables facility and vessel owners/operators to determine that the individual bearing the TWIC is the individual to whom it was issued, and that the TWIC is valid.

   TSA and its enrollment contractor regularly review the customer satisfaction results, among other measures designed to gauge the effectiveness and efficiency of the program on a monthly basis as part of the Program Management Review (PMR). These survey results, along with other information, such as enrollment statistics that are tracked for each enrollment center, provide TSA with input used for scheduling TSA TWIC program staff to travel to conduct site visits/audits at enrollment centers in the field.

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.]***

   All data is collected and stored electronically. If applicants chose to pre-enroll, an enrollment record is created for them that will be retrieved when they complete the in-person enrollment process. Trusted Agents (representatives of the TWIC deployment contractor, who perform enrollment and activation functions) administer in-person enrollment, which involves the creation of an electronic enrollment record. Fingerprints and a photograph are captured electronically and are part of the enrollment record. Proof-of-identity and immigration status documents are scanned and stored electronically. When all data has been collected, the enrollment record is transmitted to an information technology system capable of securely

storing information. Once this transmission occurs, all information is automatically deleted from the enrollment station. The TWIC data collection fulfills the requirements of the Government Paperwork Elimination Act. The optional customer satisfaction survey is provided to individuals during the TWIC activation process, as there is a short window of time between the time the port worker provides his/her identification to the Trusted Agent and when the TWIC is activated. TSA believes that this process is less burdensome and most convenient to respondents. Additionally, this will allow evaluation of both the enrollment and issuance processes.

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.***

    A key security objective of the TWIC Program is to verify an applicant's claimed identity and to identify if they pose a security risk. There is no similar information held by TSA that could be used to initiate the required background checks and accurately establish that a person's claimed identity is a *true* identity. For cases in which an applicant has already received a comparable threat assessment from DHS, including those for a credentialed merchant mariner, Hazardous Materials Endorsement (HME) holder, and Free and Secure Trade (FAST) card holder, the biographic and biometric information is collected in order for the TWIC system to ensure that applicants do not apply for multiple TWIC's under the same or a different claimed identity. In such cases, the previous DHS threat assessment is leveraged and the fee to the applicant is reduced since the full assessment does not have to be performed.

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.

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.***

    If this information is not collected, TSA cannot fulfill its statutory mandate. Without collection of the information, it would be impossible to conduct STAs on individuals who require unescorted access to secure areas of transportation facilities and vessels. Thus, TSA would not be able to issue biometric transportation security credentials to individuals who require unescorted access to secure areas of vessels and maritime facilities as required under the MTSA. If the survey is not conducted, TSA would be unable to measure participant customer satisfaction and the contractor will be unable to meet its goals for the PMR.

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).***

    This collection is conducted consistent with the information collection guidelines with the exception of 5 CFR 1320.5(d)(2)(ii). To make the survey more convenient and personal for

the enrollees, we capture the information immediately from the workers as they are departing the enrollment center. This allows for an assessment of the entire enrollment and activation process as well minimizes the burden on the individual applicant.

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 <u>Federal Register</u> 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.***

Early on in the TWIC program, TSA conducted a prototype of the TWIC enrollment and issuance procedures. Volunteer transportation workers enrolled and provided data that assisted in the successful deployment of the TWIC system and its processes.

The final estimate for the TWIC applicant population, that was computed with maritime industry and academy input as part of the rule making process, was 850K applicants. Since the program's inception in 2007, the program has performed 2.4 million enrollments. Where possible, TSA solicits input from the Coast Guard and maritime stakeholders in order assess the population for initial enrollments as well as renewals; however, the transient nature of this workforce presents a challenge to this estimating.

Additionally, during the revision of the TWIC program's Disclosure Form, TSA solicited input from the TWIC Stakeholder Communications Committee (TSCC), which is comprised of representatives from the maritime industry (associations, unions, and government groups). This input was also incorporated into the form, wherever possible.

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

TSA does not provide any payment or gift to respondents.

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

A Systems of Records was published on September 24, 2004, (69 FR 57348); Transportation Security Threat Assessment System; Transportation Worker Identification Credentialing (TWIC) System. Also, a Privacy Impact Assessment was published on November 5, 2004 on www.dhs.gov.

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 does not ask any questions of a sensitive nature.

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

Estimates of the total maritime worker population are based on historical data that TSA has compiled during the previous four years of the TWIC program. As displayed in the following table, TSA estimates there are 347,827total average annual respondents.

Table 1: TWIC Enrollment Unique Respondents (Enrollments, Growth, Turnover, and Renewals)

Fiscal (FY) Year	New Enrollments
1 (2011 Actual)	288,753
2 (2012 Actual)	308,193
3 (2013 Estimate)	342,740
4 (2014 Estimate)	358,346
5 (2015 Estimate)	441,102
Total	**1,739,134**
Annualized	**347,827**

Pre-Enrollment Hour Burden

The second factor in the calculation of the cost of workers' time was an estimate of the time required to pre-enroll. We calculated this time as the approximate number of port workers that choose to pre-enroll (33%) multiplied by the actual time required to complete the fields necessary for pre-enrollment (10 minutes or .17 hours as shown in column B). The number of enrollment applicants includes the estimated number of new enrollments (column A) from Table 1.

Table 2: Pre-Enrollment Hour Burden (Enrollments)

FY Year	Pre-Enrollment Applicants	Hours to Pre-Enroll per Applicant	Total Hours
Column	A	B	C= A*B
1 (2011 Actual)	96,251	0.17	16,363
2 (2012 Actual)	102,731	0.17	17,464
3 (2013 Estimate)	114,247	0.17	19,422
4 (2014 Estimate)	119,449	0.17	20,306
5 (2015 Estimate)	147,034	0.17	24,996
Total	**579,711**	**0.17**	**98,551**

Enrollment Hour Burden

The next factor in the calculation of the cost of workers' time was an estimate of the actual time that workers need to spend to enroll in the program. This calculation is required for two groups, those workers that pre-enrolled and those that did not. All of the following time estimates are based on historical data from the TWIC program unless otherwise noted.

For those workers that did not pre-enroll, we estimated this time as the sum of the average roundtrip commute time, 44 minutes,[1] and an average enrollment time of 12 minutes. In addition to these estimates, we added 12 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility. Commuting time, enrollment time, and possible waiting time sum to 1.13 hours per applicant. This information is captured in Table 3 below.

Table 2: Total Enrollment Burden Hours – Without Pre-Enrollment

FY Year	Enrollments	Hours to Enroll per Enrollments	Total Hours
Column	A	B	C (C= A*B)
1 (2011 Actual)	192,502	1.13	217,527
2 (2012 Actual)	205,462	1.13	232,172
3 (2013 Estimate)	228,493	1.13	258,197
4 (2014 Estimate)	238,897	1.13	269,954
5 (2015 Estimate)	294,068	1.13	332,297
Total	**1,159,423**	**1.13**	**1,310,148**

For those workers that pre-enrolled, we estimated this time as the sum of the average round trip commute time, 44 minutes, and an average enrollment time of 11 minutes. In addition to these estimates, we added 12 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility. Commuting time, enrollment time, and possible waiting time sum to 1.11 hours. This information is captured in Table 4 below.

[1] Based on actual commute time for TWIC applicants.

Table 4: Total Enrollment Burden Hours – with Pre-Enrollment

FY Year	Enrollments	Hours to Enroll per Applicant	Total Hours
Column	A	C (A+B=C)	D
1 (2011 Actual)	96,251	1.11	106,839
2 (2012 Actual)	102,731	1.11	114,031
3 (2013 Estimate)	114,247	1.11	126,814
4 (2014 Estimate)	119,449	1.11	132,588
5 (2015 Estimate)	147,034	1.11	163,208
Total	**579,711**	**1.11**	**643,480**

Table 5 provides the total enrollment burden hours. This estimate was calculated by adding the total enrollment burden hours for pre-enrollments and enrollments for each period.

Table 5: Total Enrollment Burden Hours

FY Year	Pre-Enrollment Burden	Enrollment Burden with Pre-enrollment	Enrollment Burden without Pre-enrollment	Total Hours
Column	A	B	C	D (D= A+B+C)
1 (2011 Actual)	16,363	217,527	106,839	340,729
2 (2012 Actual)	17,464	232,172	114,031	363,668
3 (2013 Estimate)	19,422	258,197	126,813	404,433
4 (2014 Estimate)	20,306	269,954	132,588	422,848
5 (2015 Estimate)	24,996	332,297	163,207	520,500
Total	**98,551**	**1,310,148**	**643,480**	**2,052,178**

Extended Expiration Date (EED)

In August 2012, TSA made a three-year extension option (extended expiration date or EED TWIC) available to individuals who 1) hold a valid TWIC that is set to expire on or before December 31, 2014 and 2) are United States citizens or nationals. The EED TWIC population estimates are based on individuals who meet the above criteria and choose to extend their security threat assessment for three years. As displayed in the following table, TSA estimates there are 155,994 total average annual respondents.

Table 6: TWIC EED Unique Respondents

FY Year	EED Requests
1 (2011 Actual)	0
2 (2012 Actual)	484 (Actual)
3 (2013 Estimate)	222,662 (Estimate)
4 (2014 Estimate)	363,115 (Estimate)
5 (2015 Estimate)	37,713 (Estimate)
Total	**623,974**
Annualized	**155,994**

To receive an EED TWIC, an individual must contact the TWIC Call Center to place an order and subsequently go to an enrollment center to complete the card issuance process.

Extended Expiration Date Order Burden

To calculate the cost of workers' time to order an EED TWIC, TSA estimated the amount of time that an applicant spent on hold with the TWIC Call Center to order a TWIC and the subsequent amount of time to process the order. We estimated the hold time as 15 minutes and an average of 11 minutes to process the EED order. Hold time and order time sum to 26 minutes or .42 hours per applicant.

Table 7: Total EED Order Burden Hours

FY Year	EED Requests	Hours per Process EED Order	Total Hours
1 (2011)	0	0.42	0
2 (2012)	484	0.42	203
3 (2013)	222,662	0.42	93,518
4 (2014)	363,115	0.42	152,508
5 (2015)	37,713	0.42	15,839
Total	**623,974**	**0.42**	**262,069**
Annualized	**155,994**	**0.42**	**65,517**

Card Issuance Hour Burden

The next factor in the calculation of the cost of workers' time was an estimate of the actual time that workers need to spend retrieving their card.
- For applicants who enroll for a TWIC, upon successful completion of an STA, individuals are notified to return to the enrollment site that they specify during enrollment to receive their card.

- For individuals who order an EED TWIC, upon completion of card production, individuals are notified via their preferred notification method (email or telephone) to

return to the enrollment site that they specify during their EED order to receive their card.

Upon reaching the enrollment site and providing their unique biographical information, applicants are asked to complete a short, optional customer satisfaction survey while their TWIC is being activated.

We estimated this time as the sum of the average round trip commute time, 44 minutes, and an average card issuance time of 8 minutes. This includes the time required to complete the customer satisfaction survey since the survey will be completed while the port worker is waiting to have their card activated. In addition to these estimates, we added 12 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility. The sum of commuting time, card issuance, and possible waiting time were rounded to 64 minutes, or 1.06 hour for this calculation.

Replacements are based on the historical ratio of replacements to initial enrollments, 2.86 percent and the EED option is for those individuals who extend their original STA for three years (less the 10% percent who choose to re-enroll for the five-year TWIC). This information is captured in Table 8 below.

Table 8: Card Issuance Hour Burden

FY Year	Enrollments	Replacements	EED Requests	Total Enrollments, Replacements, and EED Requests	Hours per Card Issuance	Total Hour Burden
Column	A	B	C	D=A+B+C	E	F= D*E
1 (2011 Actuals)	288,753	20,725	0	309,478	1.06	306,078
2 (2012 Actuals)	308,193	21,751	484	330,428	1.06	333,191
3 (2013 Estimate)	342,740	22,500	222,662	587,902	1.06	629,624
4 (2014 Estimate)	358,346	22,500	363,115	743,961	1.06	764,749
5 (2015 Estimate)	441,102	22,500	37,713	501,315	1.06	507,544
Total	**1,739,134**	**109,976**	**623,974**	**2,473,084**	**1.06**	**2,541,186**

Appeals and Waivers Hour Burden

The TWIC regulation provides applicants with the option to file an appeal or waiver with respect to the results compiled during their eligibility assessment.

We estimate the number of appeals/waivers by taking the total number of yearly enrollments estimated above and applying the actual 2 percent disqualification rate and 61 percent appeal rate (e.g., those individuals that requested an appeal or a waiver after initially being denied)

that were witnessed during the previous three years of the TWIC program. See Table 9 below. Please note that waivers and appeals are not applicable for replacements and EED requests.

Table 9: Total Waiver and Appeals

FY Year	Enrollments	Disqualification Rate	Appeal/ Waiver Rate	Total Waivers and Appeals
Column	A	B	C	D=(A*B*C)
1 (2011 Actual)	288,753	2%	61%	3,523
2 (2012 Actual)	308,193	2%	61%	3,760
3 (2013 Estimate)	342,740	2%	61%	4,181
4 (2014 Estimate)	358,346	2%	61%	4,372
5 (2015 Estimate)	441,102	2%	61%	5,381
Total	**1,739,134**	**2%**	**61%**	**21,217**
Annualized	**347,827**	**2%**	**61%**	**4,243**

We estimate that each appeal and waiver takes six hours to complete. Individuals who ask for appeals and waivers must do a variety of activities. At the very least, they need to write a letter to TSA, and they also may need to collect information about their conviction from their local jurisdiction. In other cases, the applicant may need to only provide their social security number or legal resident number. We show the estimates for the yearly hours of appeals and waivers below in Table 10.

Table 10: Total Waiver and Appeals Respondent Hours

FY Year	Appeals and Waivers*	Hours	Total Hour Burden
Column	A	B	C= A*B
1 (2011 Actual)	3,523	6	21,137
2 (2012 Actual)	3,760	6	22,560
3 (2013 Estimate)	4,181	6	25,089
4 (2014 Estimate)	4,372	6	26,231
5 (2015 Estimate)	5,381	6	32,289
Total	**21,217**	**6**	**127,305**
Annualized	**4,243**	**6**	**25,461**
*From Column D in Table 8.			

Totals

Table 11 presents the annual number of estimated respondents to the TWIC program.

We estimate that a TWIC applicant submits his or her information to TSA only once a year, the total number of responses is the total number of respondents plus those applicants who submit additional information for an appeal or waiver. Enrollments include initial enrollments as well as replacements and renewals. Table 11 below shows the total annual responses estimated for the TWIC program. The annualized number of total responses is 962,629.

Table 11: Total Responses

FY Year	Total Pre-Enrollment	Total Enrollmensts (No Pre-Enroll)	Total Enrollments (With Pre-Enroll)	Card Issuance	Appeals/ Waivers	Total Responses
Column	A	B	C	D	E	F= A+B+C+D+E
1 (2011 Actual)	96,251	192,502	96,251	309,478	3,523	698,005
2 (2012 Actual)	102,731	205,462	102,731	330,428	3,760	745,112
3 (2013 Estimate)	114,247	228,493	114,247	587,902	4,181	1,049,070
4 (2014 Estimate)	119,449	238,897	119,449	743,961	4,372	1,226,127
5 (2015 Estimate)	147,034	294,068	147,034	501,315	5,381	1,094,832
Total	**579,711**	**1,159,423**	**579,711**	**2,473,084**	**21,217**	**4,813,147**
Annualized	**115,942**	**231,885**	**115,942**	**494,617**	**4,243**	**962,629**

Table 12 shows the total five-year hour burden to TWIC applicants. The annualized hour burden is 6,129,367 hours.

Table 12: Total Respondent Burden Hours

FY Year	Total Pre-Enrollment Hours	Total Enrollment Hours (No Pre-Enroll)	Total Enrollment Hours (With Pre-Enroll)	Card Issuance Hours	Appeals/ Waivers Hours	Total Hour Burden
Column	A	B	C	D	E	F= A+B+C+D+E
1 (2011 Actual)	16,363	217,527	340,729	306,078	21,137	901,833
2 (2012 Actual)	17,464	232,172	363,668	333,191	22,560	969,055
3 (2013 Estimate)	19,422	258,197	404,433	629,624	25,089	1,336,765
4 (2014 Estimate)	20,306	269,954	422,848	764,749	26,231	1,504,088
5 (2015 Estimate)	24,996	332,297	520,500	507,544	32,289	1,417,626
Total	**98,551**	**1,310,148**	**2,052,178**	**2,541,186**	**127,305**	**6,129,367**
Annualized	**19,710**	**262,030**	**410,436**	**508,237**	**25,461**	**1,225,873**

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

TWIC is a fee-based program, meaning that TWIC applicants pay a fee that represents the total cost of the program, prorated over the expected number of applicants. TWIC credentials are valid for a period of five years. The five-year renewal of a TWIC costs the same as the initial enrollment. TSA has estimated the information collection and credential issuance portion of the TWIC fee will be $34.50, plus $14.50 for the FBI CHRC fee, and $80.75 for TSA to complete the threat assessment and produce the credential, for a total of $129.75. The total enrollments includes both initial and the renewal enrollees who do not choose the three-year extended TWIC option (which is estimated at 10%) and has a total five-year cost of $225.7 million (Table 13).

If an individual loses their TWIC, it can be replaced for a reduced fee of $60 each. The total five-year cost of the replacement cards is $6.6 million (Table 14). The EED option (those individuals who choose a three-year extension) is also priced at a fee of $60. The total five year cost of the EEDs is $37.4 million (Table 15).

Table 16 below shows the estimated annual fee collections. The annualized estimate of enrollments, renewals, and EEDs is $53.9 million.

Table 13: Enrollment Fees

FY Year	Total Enrollments	Fee per Enrollment	Total
Column	A	B	C=A*B
1 (2011 Actual)	288,753	$129.75	$37,465,702
2 (2012 Actual)	308,193	$129.75	$39,988,042
3 (2013 Estimate)	342,740	$129.75	$44,470,515
4 (2014 Estimate)	358,346	$129.75	$46,495,394
5 (2015 Estimate)	441,102	$129.75	$57,232,985
Total	**1,739,134**	**$129.75**	**$225,652,637**

Table 14: Replacement Fees

Year	Replacements	Fee per Replacement	Total
Column	A	B	C=A*B
1 (2011 Actual)	20,725	$60.00	$1,243,500
2 (2012 Actual)	21,751	$60.00	$1,305,060
3 (2013 Estimate)	22,500	$60.00	$1,350,000
4 (2014 Estimate)	22,500	$60.00	$1,350,000
5 (2015 Estimate)	22,500	$60.00	$1,350,000
Total	**109,976**	**$60.00**	**$6,598,560**

Table 15: EED Fees

FY Year	Total EED Enrollments	Fee per EED	Total
Column	A	B	C=A*B
1 (2011 Actual)	0	$60.00	$0
2 (2012 Actual)	484	$60.00	$29,040
3 (2013 Estimate)	222,662	$60.00	$13,359,720
4 (2014 Estimate)	363,115	$60.00	$21,786,900
5 (2015 Estimate)	37,713	$60.00	$2,262,780
Total	**623,974**	**$60.00**	**$37,438,440**

Table 16: Total Fee Costs

FY Year	Enrollment Cost	Replacement Cost	EED Cost	Total Cost
Column	A	B	C	D=A+B+C
1 (2011 Actual)	$37,465,702	$1,243,500	$0	$38,709,202
2 (2012 Actual)	$39,988,042	$1,305,060	$29,040	$41,322,142
3 (2013 Estimate)	$44,470,515	$1,350,000	$13,359,720	$59,180,235
4 (2014 Estimate)	$46,495,394	$1,350,000	$21,786,900	$69,632,294
5 (2015 Estimate)	$57,232,985	$1,350,000	$2,262,780	$60,845,765
Total	**$225,652,637**	**$6,598,560**	**$37,438,440**	**$269,689,637**
Annualized	**$45,130,527**	**$1,319,712**	**$7,487,688**	**$53,937,927**

14. *Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.*

TSA charges a user fee, which covers the majority of its threat assessment, credentialing, and other operational costs associated with the program. TSA has spent $94 million in appropriated funds to develop the program, and $8.1 million in appropriated funds to test the functionality and effectiveness of the TWIC with card readers. Since beginning enrollments in October 2007, TSA has expended approximately $205 million from fee revenue -- $307 million total.

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

The burden was changed from the previous submission in 2008. At that time, the TWIC Program had only recently been deployed and many numbers were estimates (based on input from academia, industry, and other government sources). However, data used in this submission are based on actuals, as well as more refined estimates. There are no changes to the information being collected. TSA also has recently adjusted the hour and cost burden to account for those eligible TWIC holders who choose the three-year extended TWIC option (EED TWIC) as described above.

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 would be inappropriate.*

TSA is not seeking such approval.

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

TSA is not seeking any exceptions to the certification statement.