

**Transportation Worker Identification Credential**

*Last Updated: 3/28/14*

- 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 survey is administered at the end of the service (enrollment or activation) for which the applicant is at the enrollment center. The survey is displayed on the computer monitor facing the applicant, and the applicant enters their survey response via a numeric keypad. Providing the survey at the end of service allows the applicant to provide immediate feedback.

- 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 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.**

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 2.8 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.

Also, TSA published a Federal Register notice, with a 60 day comment period, soliciting comments on the information collection on May 30, 2013, 78 FR 32471. In response to this notice, TSA received three comments:

The first comment was from James H. I Weakley, President of Lake Carriers Association, whose members are mariners. Lake Carriers believed the requirement for their members to have a valid TWIC card as well as the Merchant Mariner Credential (MMC) and/or license issued by the US Coast Guard created an unnecessary burden. TSA informed the commenter that the MMC and the TWIC served two separate purposes for a mariner. The MMC served as an individual's qualification document, certificate of identification and certificate of service. Whereas, the TWIC was an identification credential indicating that an individual did not pose a terrorism threat, and it was issued after the completion of a security threat assessment.

The second comment was from Cynthia Hilton, Executive Vice President of Institute of Makers of Explosives. IME wanted to know what process TSA would use to establish and notify populations that are "authorized by TSA" to apply for a TWIC. Also, IME provided a statement that 'TSA may collect fees from non-transportation workers and asserted that chemical plant workers should be able to apply for a TWIC card and pay the standard user fee.' In response, TSA informed IME of the process in place and provided the pertinent statute as to who TSA is authorized to charge reasonable fees.

The third comment was from John A. C. Cartner. The comment did not pertain to the collection of information.

In addition to the 60-day notice, TSA also published a 30-day notice on September 26, 2013 (79 FR 59364). There were no comments received 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 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](http://www.dhs.gov). There is no assurance of confidentiality provided to respondents.

**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 361,260 total average annual respondents.

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

<b>Fiscal Year (FY)</b>	<b>New Enrollments</b>
Column	A
1 (2011 Actual)	288,753
2 (2012 Actual)	308,193
3 (2013 Actual)	409,908
4 (2014 Estimate)	358,346
5 (2015 Estimate)	441,102
<b>Total</b>	<b>1,806,302</b>
<b>Annualized</b>	<b>361,260</b>

### ***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 0.17 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)**

<b>Fiscal Year (FY)</b>	<b>Pre-Enrollment Applicants</b>	<b>Hours to Pre-Enroll per Applicant</b>	<b>Total Hours</b>
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 Actual)	136,636	0.17	23,228
4 (2014 Estimate)	119,449	0.17	20,306
5 (2015 Estimate)	147,034	0.17	24,996
<b>Total</b>	<b>602,101</b>	<b>0.17</b>	<b>102,357</b>

### ***Customer Satisfaction Survey Hour Burden (Enrollments)***

The third factor in the calculation of the cost of workers' time was an estimate of the time required to participate in an optional customer satisfaction survey. We calculated this time as the approximate number of port workers that choose to participate in the survey (35% based on historical data) multiplied by the actual time required to complete the four question electronic survey (1.5 minutes or 0.025 hours as shown in column B). The number of survey participants is derived from the estimated number of new enrollments (column A) from Table 1 multiplied by the historical percentage of participation (35%).

**Table 3: Customer Satisfaction Survey Hour Burden (Enrollments)**

<b>Fiscal Year (FY)</b>	<b>Survey Participants</b>	<b>Hours to Complete Survey per Applicant</b>	<b>Total Hours</b>
Column	A	B	C= A*B
1 (2011 Actual)	101,064	0.025	2,527
2 (2012 Actual)	107,868	0.025	2,697
3 (2013 Actual)	143,468	0.025	3,587
4 (2014 Estimate)	125,421	0.025	3,136
5 (2015 Estimate)	154,386	0.025	3,860
<b>Total</b>	<b>632,206</b>	<b>0.025</b>	<b>15,805</b>

### ***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,<sup>1</sup> and an average enrollment time of 10 minutes. Please note that the 10 minutes for enrollment is a reduction from the previous 12 minute enrollment time. This reduction in time is attributable to increased efficiency provided by the enrollment software implemented by the Universal Enrollment Services (UES) contractor in April 2013. 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 1.10 hours per applicant. This information is captured in Table 4 below.

---

<sup>1</sup> Based on actual commute time for TWIC applicants.

**Table 4: Total Enrollment Burden Hours – Without Pre-Enrollment**

<b>Fiscal Year (FY)</b>	<b>Enrollments</b>	<b>Hours to Enroll per Enrollments</b>	<b>Total Hours (w/o Survey)</b>
Column	A	B	C (C= A*B)
1 (2011 Actual)	192,502	1.10	211,752
2 (2012 Actual)	205,462	1.10	226,008
3 (2013 Actual)	273,272	1.10	300,599
4 (2014 Estimate)	238,897	1.10	262,787
5 (2015 Estimate)	294,068	1.10	323,475
<b>Total</b>	<b>1,204,201</b>	<b>1.10</b>	<b>1,324,621</b>

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 10 minutes. Once again please note that the 10 minutes for enrollment is a reduction from the previous 11 minute enrollment time. This reduction in time is attributable to increased efficiency provided by the enrollment software implemented by the Universal Enrollment Services (UES) contractor in April 2013. 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 1.1 hours. This information is captured in Table 5 below.

**Table 5: Total Enrollment Burden Hours – with Pre-Enrollment**

<b>Fiscal Year (FY)</b>	<b>Enrollments</b>	<b>Hours to Enroll per Applicant</b>	<b>Total Hours</b>
Column	A	C (A+B=C)	D
1 (2011 Actual)	96,251	1.10	105,876
2 (2012 Actual)	102,731	1.10	113,004
3 (2013 Actual)	136,636	1.10	150,300
4 (2014 Estimate)	119,449	1.10	131,394
5 (2015 Estimate)	147,034	1.10	161,737
<b>Total</b>	<b>602,101</b>	<b>1.10</b>	<b>662,311</b>

Table 6 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 along with the burden for completing the enrollment customer satisfaction survey.



**INFORMATION COLLECTION SUPPORTING STATEMENT**

**Transportation Worker Identification Credential**

**Table 6: Total Enrollment Burden Hours**

<b>Fiscal Year (FY)</b>	<b>Pre-Enrollment Burden</b>	<b>Enrollment Burden with Pre-enrollment</b>	<b>Enrollment Burden without Pre-enrollment</b>	<b>Enrollment Survey Burden</b>	<b>Total Hours</b>
Column	A	B	C	D	E (E= A+B+C+D)
1 (2011 Actual)	16,363	105,876	211,752	2,527	336,518
2 (2012 Actual)	17,464	113,004	226,008	2,697	359,173
3 (2013 Actual)	23,228	150,300	300,599	3,587	477,714
4 (2014 Estimate)	20,306	131,394	262,787	3,136	417,623
5 (2015 Estimate)	24,996	161,737	323,475	3,860	514,068
<b>Total</b>	<b>102,357</b>	<b>662,311</b>	<b>1,324,621</b>	<b>15,805</b>	<b>2,105,095</b>

**Transportation Worker Identification Credential**

***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 155,485 total average annual respondents.

**Table 7: TWIC EED Unique Respondents**

<b>Fiscal Year (FY)</b>	<b>EED Requests</b>
1 (2011 Actual)	0
2 (2012 Actual)	484
3 (2013 Actual)	220,628
4 (2014 Estimate)	363,115
5 (2015 Estimate)	37,713
<b>Total</b>	<b>621,940</b>
<b>Annualized</b>	<b>155,485</b>

To receive an EED TWIC, an individual must either contact the TWIC Call Center to place an order or order through the TSA Universal Enrollment Services website. Subsequently, the individual goes to an enrollment center to complete the card issuance process or may elect to have the card shipped directly to them (see the OneVisit section below).

***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 5 minutes and an average of 9.5 minutes to process the EED order. Please note that the hold time has been reduced from 15 minutes to 5 minutes, and the processing time has been reduced from 11 minutes to 9.5 minutes. Hold time and processing time reductions are attributable to increased staffing at the Call Center as well as more streamlined and efficient software used for the order process.

Hold time and order time sum to 14.5 minutes or 0.24 hours per applicant. Burden for ordering an EED TWIC through the website is not expected to differ from ordering an EED TWIC through the Call Center. If TSA determines (after the online functionality has been deployed and in use for several months) that the Call Center and website burdens differ, then the EED burden tables shall be updated.

**Table 8: Total EED Order Burden Hours**

<b>Fiscal Year (FY)</b>	<b>EED Requests</b>	<b>Hours per Process EED Order</b>	<b>Total Hours</b>
1 (2011 Actual)	0	0.24	0
2 (2012 Actual)	484	0.24	116
3 (2013 Actual)	220,628	0.24	52,951
4 (2014 Estimate)	363,115	0.24	87,148
5 (2015 Estimate)	37,713	0.24	9,051
<b>Total</b>	<b>621,940</b>	<b>0.24</b>	<b>149,266</b>
<b>Annualized</b>	<b>155,485</b>	<b>0.24</b>	<b>37,316</b>

**OneVisit**

The Coast Guard and Maritime Transportation Act of 2012 (H.R. 2838-42) requires that TSA “reform the process for [TWIC] enrollment, activation, issuance, and renewal to require, in total, not more than one in-person visit to a designated enrollment center except in cases in which there are extenuating circumstances, as determined by the Secretary, requiring more than one such in-person visit.” In order to comply with the statutory requirement, TSA will offer to TWIC applicants an option during the enrollment process which allows them to request their card to be shipped directly to an address of their choosing. This option is referred to as “OneVisit” since the only visit required by the applicant to an enrollment center is for enrollment. Prior to this requirement, all applicants were asked to confirm the location where they would pick up their card after it was processed. As part of OneVisit, TSA is adding a location of home mailing to the list of locations for pickup to begin to accommodate the OneVisit option.

In July 2013, the TWIC OneVisit option was tested with enrollment centers in the state of Alaska where applicants may need to travel long distances due to the size of the region and population density of the region. Similarly, TSA expanded the OneVisit mailing location option in December 2013 to include enrollment centers in the upper peninsula of Michigan which also has been identified as having higher levels of difficulty for applicants to travel to the region’s enrollment locations. TSA anticipates that all enrollment centers nationwide will offer the OneVisit option by the end of summer 2014. Additionally, the OneVisit option will be made available not only to those enrolling for a TWIC but also to those requesting a replacement card or Extended Expiration Date (EED) TWIC.

Using information from the initial Alaska and Michigan enrollment centers that provide for OneVisit, TSA estimates that 75% of TWIC applicants will request that their cards be mailed to them instead of travelling to an enrollment center for pickup. Correspondingly, the card issuance population and associated burden for FY 2014 and FY 2015 has been reduced.

Please see the two tables below for a breakdown of the number of applicants who may still travel to an enrollment center for card pickup (Table 9) and those applicant who may choose to have their cards mailed directly to them (Table 10).

**Table 9: Estimated Applicants Picking Up Cards at an Enrollment Center**

Fiscal Year (FY)	Full Enrollments	Replacements	EED Requests	Total Card Issuance Transactions (Cards Picked Up At Enrollment Center)
Column	A	B	C	D=A+B+C
1 (2011 Actual)	288,753	20,725	0	309,478
2 (2012 Actual)	308,193	21,751	0	329,944
3 (2013 Actual)	409,908	14,087	220,628	644,623
4 (2014 Estimate)	89,587	3,136	90,779	183,501
5 (2015 Estimate)	110,276	3,860	9,428	123,563
<b>Total</b>	<b>1,206,716</b>	<b>63,558</b>	<b>320,835</b>	<b>1,591,109</b>

**Table 10: Estimated Applicants Requesting Cards Mailed (OneVisit)**

Fiscal Year (FY)	OneVisit Enrollments	OneVisit Replacements	OneVisit EED Requests	Total OneVisit Transactions
Column	A	B	C	D=A+B+C
1 (2011 Actual)	0	0	0	0
2 (2012 Actual)	0	0	0	0
3 (2013 Actual)	0	0	0	0
4 (2014 Estimate)	268,760	9,407	272,336	550,502
5 (2015 Estimate)	330,827	11,579	28,285	370,690
<b>Total</b>	<b>599,586</b>	<b>20,986</b>	<b>300,621</b>	<b>921,193</b>

### ***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 a replacement card or 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.

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. 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 1.07 hour for this calculation.

Replacements are based on the historical ratio of replacements to initial enrollments, 3.5 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).

Card issuance burden only applies to those individuals who choose to pick up their card at an enrollment center. The anticipated population is depicted in Table 9 - Estimated Applicants Picking Up Cards at an Enrollment Center.

***Customer Satisfaction Survey Hour Burden (Card Issuance)***

After completing the card issuance process, applicants are asked to complete a short, optional electronic four question customer satisfaction survey (1.5 minutes or .025 hours). In accordance with historical data it is estimated that 35% of total card issuance population (Table 9, Column D) will participate in the optional survey. The Card Issuance Customer Satisfaction Survey burden is captured in Table 11.

**Table 11: Customer Satisfaction Survey Hour Burden (Card Issuance)**

<b>Fiscal Year (FY)</b>	<b>Total Number of Individuals Picking Up Card At Enrollment Center</b>	<b>Survey Participants (35% of Total Individuals)</b>	<b>Hours to Complete Survey per Individual</b>	<b>Total Hours</b>
Column	A	B	C	D=B*C
1 (2011 Actual)	309,478	108,317	0.025	2,708
2 (2012 Actual)	329,944	115,480	0.025	2,887
3 (2013 Actual)	644,623	225,618	0.025	5,640
4 (2014 Estimate)	183,501	64,225	0.025	1,606
5 (2015 Estimate)	123,563	43,247	0.025	1,081
<b>Total</b>	<b>1,591,109</b>	<b>556,888</b>	<b>0.025</b>	<b>13,922</b>

**Transportation Worker Identification Credential**

Total Card Issuance burden (including enrollments, replacements, and EED TWICs and customer satisfaction surveys) is captured in Table 12 below.

The impact of OneVisit may be seen in the numbers for FY 2014 and FY 2015 as the anticipated number of individuals who choose to pick up their cards in person has been reduced by 75% (see Table 9 - Estimated Applicants Picking Up Cards at an Enrollment Center and Table 10: Estimated Applicants Requesting Cards Mailed (OneVisit)).

**Table 12: Card Issuance Hour Burden**

<b>Fiscal Year (FY)</b>	<b>Total Number of Individuals Picking Up Card At Enrollment Center</b>	<b>Hours per Card Issuance</b>	<b>Total Hour Burden w/o Survey</b>	<b>Survey Hour Burden</b>	<b>Total Hour Burden</b>
Column	A	B	C=A*B	D	E=C+D
1 (2011 Actual)	309,478	1.06	328,047	2,708	330,755
2 (2012 Actual)	329,944	1.06	349,741	2,887	352,628
3 (2013 Actual)	644,623	1.06	683,300	5,640	688,941
4 (2014 Estimate)	183,501	1.06	194,511	1,606	196,116
5 (2015 Estimate)	123,563	1.06	130,977	1,081	132,058
<b>Total</b>	<b>1,591,109</b>	<b>1.06</b>	<b>1,686,576</b>	<b>13,922</b>	<b>1,700,498</b>

***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 13 below. Please note that waivers and appeals are not applicable for replacements and EED requests.

**Table 13: Total Waiver and Appeals**

<b>Fiscal Year (FY)</b>	<b>Enrollments</b>	<b>Disqualification Rate</b>	<b>Appeal/Waiver Rate</b>	<b>Total Waivers and Appeals</b>
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 Actual)	409,908	2%	61%	5,001
4 (2014 Estimate)	358,346	2%	61%	4,372
5 (2015 Estimate)	441,102	2%	61%	5,381
<b>Total</b>	<b>1,806,302</b>	<b>2%</b>	<b>61%</b>	<b>22,037</b>
<b>Annualized</b>	<b>361,260</b>	<b>2%</b>	<b>61%</b>	<b>4,407</b>

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 14.

**Table 14: Total Waiver and Appeals Respondent Hours**

<b>Fiscal Year (FY)</b>	<b>Appeals and Waivers*</b>	<b>Hours</b>	<b>Total Hour Burden</b>
Column	A	B	C= A*B
1 (2011 Actual)	3,523	6	21,137
2 (2012 Actual)	3,760	6	22,560
3 (2013 Actual)	5,001	6	30,005
4 (2014 Estimate)	4,372	6	26,231
5 (2015 Estimate)	5,381	6	32,289
<b>Total</b>	<b>22,037</b>	<b>6</b>	<b>132,221</b>
<b>Annualized</b>	<b>4,407</b>	<b>6</b>	<b>26,444</b>

\*From Column D in Table 13.

**Transportation Worker Identification Credential**

**Totals**

Table 15 presents the annual number of estimated responses 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 15 below shows the total annual responses estimated for the TWIC program. The annualized number of total responses is 1,042,129.

**Table 15: Total Responses**

<b>Fiscal Year (FY)</b>	<b>Total Pre-Enrollment</b>	<b>Total Enrollments (No Pre-Enroll)</b>	<b>Total Enrollments (With Pre-Enroll)</b>	<b>Enrollment Survey Participants</b>	<b>Total Number of Individuals Picking Up Card At Enrollment Center</b>	<b>Card Issuance Survey Participants</b>	<b>Appeals/Waivers</b>	<b>Total Responses</b>
Column	A	B	C	D	E	F	G	H= A+B+C+D+E+F+G
1 (2011 Actual)	96,251	192,502	96,251	101,064	309,478	108,317	3,523	714,884
2 (2012 Actual)	102,731	205,462	102,731	107,868	329,944	115,480	3,760	762,514
3 (2013 Actual)	136,636	273,272	136,636	143,468	644,623	225,618	5,001	1,291,982
4 (2014 Estimate)	119,449	238,897	119,449	125,421	183,501	64,225	4,372	616,416
5 (2015 Estimate)	147,034	294,068	147,034	154,386	123,563	43,247	5,381	620,646
<b>Total</b>	<b>602,101</b>	<b>1,204,201</b>	<b>602,101</b>	<b>632,206</b>	<b>1,591,109</b>	<b>556,888</b>	<b>22,037</b>	<b>4,006,441</b>
<b>Annualized</b>	<b>120,420</b>	<b>240,840</b>	<b>120,420</b>	<b>126,441</b>	<b>318,222</b>	<b>111,378</b>	<b>4,407</b>	<b>1,042,129</b>



Table 16 shows the total five-year hour burden to TWIC applicants. The annualized hour burden is 787,563 hours.

**Table 16: Total Respondent Burden Hours**

<b>Fiscal Year (FY)</b>	<b>Total Pre-Enrollment Hours</b>	<b>Total Enrollment Hours (No Pre-Enroll)</b>	<b>Total Enrollment Hours (With Pre-Enroll)</b>	<b>Enrollment Survey Hours</b>	<b>Card Issuance Hours (Without Survey)</b>	<b>Card Issuance Survey Hours</b>	<b>Appeals/Waivers Hours</b>	<b>Total Hour Burden</b>
Source	Table 2 Column C	Table 6 Column C	Table 6 Column B	Table 3 Column C	Table 12 Column C	Table 11 Column D	Table 14 Column C	
Column	A	B	C	D	E	F	G	H= A+B+C+D+E+F+G
1 (2011 Actual)	16,363	211,752	105,876	2,527	328,047	2,708	21,137	688,409
2 (2012 Actual)	17,464	226,008	113,004	2,697	349,741	2,887	22,560	734,361
3 (2013 Actual)	23,228	300,599	150,300	3,587	683,300	5,640	30,005	1,196,660
4 (2014 Estimate)	20,306	262,787	131,394	3,136	194,511	1,606	26,231	639,970
5 (2015 Estimate)	24,996	323,475	161,737	3,860	130,977	1,081	32,289	678,415
<b>Total</b>	<b>102,357</b>	<b>1,324,621</b>	<b>662,311</b>	<b>15,805</b>	<b>1,686,576</b>	<b>13,922</b>	<b>132,221</b>	<b>3,937,814</b>
<b>Annualized</b>	<b>20,471</b>	<b>264,924</b>	<b>132,462</b>	<b>3,161</b>	<b>337,315</b>	<b>2,784</b>	<b>26,444</b>	<b>787,563</b>

**Transportation Worker Identification Credential**

**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 include 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 \$234.4 million (Table 17).

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 \$5.1million (Table 18). 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 \$37.3 million (Table 19).

Table 20 below shows the estimated annual fee collections. The annualized estimate of enrollments, renewals, and EEDs is \$57.2million.

Please note that there are no changes to the TWIC enrollment fee, card replacement fee, or EED fee as a result of the OneVisit implementation.

**Table 17: Enrollment Fees**

<b>Fiscal Year (FY)</b>	<b>Total Enrollments</b>	<b>Fee per Enrollment</b>	<b>Total</b>
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 Actual)	409,908	\$129.75	\$53,185,563
4 (2014 Estimate)	358,346	\$129.75	\$46,495,394
5 (2015 Estimate)	441,102	\$129.75	\$57,232,985
<b>Total</b>	<b>1,806,302</b>	<b>\$129.75</b>	<b>\$234,367,685</b>

**Table 18: Replacement Fees**

<b>Fiscal Year (FY)</b>	<b>Replacements</b>	<b>Fee per Replacement</b>	<b>Total</b>
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 Actual)	14,087	\$60.00	\$845,220
4 (2014 Estimate)	12,542	\$60.00	\$752,527
5 (2015 Estimate)	15,439	\$60.00	\$926,314
<b>Total</b>	<b>84,544</b>	<b>\$60.00</b>	<b>\$5,072,621</b>

**Table 19: EED Fees**

<b>Fiscal Year (FY)</b>	<b>Total EED Enrollments</b>	<b>Fee per EED</b>	<b>Total</b>
Column	A	B	C=A*B
1 (2011 Actual)	0	\$60.00	\$0
2 (2012 Actual)	484	\$60.00	\$29,040
3 (2013 Actual)	220,628	\$60.00	\$13,237,680
4 (2014 Estimate)	363,115	\$60.00	\$21,786,900
5 (2015 Estimate)	37,713	\$60.00	\$2,262,780
<b>Total</b>	<b>621,940</b>	<b>\$60.00</b>	<b>\$37,316,400</b>

**Table 20: Total Fee Costs**

<b>Fiscal Year (FY)</b>	<b>Enrollment Cost</b>	<b>Replacement Cost</b>	<b>EED Cost</b>	<b>Total Cost</b>
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 Actual)	\$53,185,563	\$845,220	\$13,237,680	\$67,268,463
4 (2014 Estimate)	\$46,495,394	\$752,527	\$21,786,900	\$69,034,820
5 (2015 Estimate)	\$57,232,985	\$926,314	\$2,262,780	\$60,422,079
<b>Total</b>	<b>\$234,367,685</b>	<b>\$5,072,621</b>	<b>\$37,316,400</b>	<b>\$276,756,705</b>
<b>Annualized</b>	<b>\$46,873,536.90</b>	<b>\$1,014,524</b>	<b>\$9,329,100</b>	<b>\$57,217,161</b>

- 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) and OneVisit option 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.