

INFORMATION COLLECTION SUPPORTING STATEMENT

OFFICE OF TRAINING AND WORKFORCE ENGAGEMENT CANINE TRAINING AND EVALUATION BRANCH (CTEB), END OF COURSE LEVEL 1 EVALUATION (1652-0041)

- 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.)***

The information obtained from the End of Course Level 1 Evaluation provides valuable feedback to staff of the TSA Office of Training and Workforce Engagement (OTWE) Canine Training and Evaluation Branch (CTEB) and is used to improve course curriculum and course instruction for future courses offered to students and ensure the overall success of the program. The feedback is collected and analyzed; implementation of positive program changes occur because of the student/handler data collected. It is necessary to collect feedback from course participants to improve and change curriculum for future attendees. This program originated in the Federal Aviation Administration (FAA) in 1972 and, along with other programs, was transferred to TSA pursuant to the Aviation and Transportation Security Act (ATSA), (Pub. L. 107-71; November 19, 2001).

- 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.***

Students who successfully complete the OTWE CTEB Explosives Detection Canine Handlers Course, Passenger Screening Handlers Course, and Supervisor/Trainer Seminars may submit numerical ratings and written comments on the quality of training they receive during the course. This provides valuable feedback to the Supervisory Air Marshal in Charge (SAC) of the CTEB, instructional staff, and supervisors on how the training material was presented and received. The feedback is used to improve the course curriculum and course of instruction.

The collection of information has been modified since it was approved by OMB on September 27, 2013. The changes to the evaluation are largely cosmetic, non-substantive changes, designed to clarify and increase ease-of-use for the respondents and the CTEB instructional staff. The evaluation now has a drop down menu for respondents to utilize for their response. It also has 6 Instructor sections as the training has 6 instructors.

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.]***

The OTWE CTEB End of Course Level 1 Evaluation information is collected electronically. In compliance with the Government Paperwork Elimination Act (GPEA), all CTEB graduates submit numerical ratings and written comments electronically through a secure internal network drive accessible only by authorized personnel.

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.***

Obtaining information from attendees, for the sole purpose of improving course curriculums, is the goal of the collection. The survey provides a direct and efficient way to collect feedback. This information is not available through any other source.

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.***

This information is collected onsite from students who graduate from the OTWE CTEB Explosives Detection Canine Handlers Course, Passenger Screening Canine Handlers Course, and Supervisor/Trainer Seminars to provide constructive feedback about their experience. Each graduate has the opportunity to provide as much or as little feedback as they feel necessary. This information enables TSA to update, improve, and tailor the training, curriculum, and instructor interaction for optimal education and high quality instruction. Training development personnel compile the collected data into quarterly assessments of the overall quality of the training environment. If this collection were not conducted, NEDCTP and CTEB would be limited in improving and updating the course curriculum.

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 will be conducted consistent with the general information guidelines.

- 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 published a notice in the Federal Register, with a 60-day period for soliciting comments, on December 29, 2014, (See 79 FR 78099) and a 30-day notice, on April 14, 2015 (See 80 FR 20003). TSA received no comments in reply to the notices.

- 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.**

TSA does not provide an assurance of confidentiality. However, TSA has protocols in place to ensure data security and integrity. The process works as follows: The student completes the evaluation while being proctored by CTEB Training Development Staff who then collects student responses. Students may remain anonymous when completing the evaluation, i.e., they have the option to provide their names on the evaluation. CTEB Training Development Staff then compiles all scores and comments into a summary document sanitized of any student names. The summary is then distributed only to appropriate CTEB persons with a need to know for review, analysis, and addressing findings.

- 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 or private nature on the End of Course Level 1 Evaluation form.

- 12. Provide estimates of hour and cost burdens of the collection of information.**

TSA estimates the hour burden will be one hour per participant. Based on an average of 180 students per calendar year, the total annual burden estimate is 180 hours per calendar year.

The cost burden is calculated by multiplying the hours by the average hourly wage rate of the participants. Based on historical data from the program office, TSA estimates the

participants are made up of approximately 68% law enforcement officers and 32% TSA I-Band level employees. The national average fully loaded hourly wage for Police and Sheriff's Patrol Officers is \$44.75¹. The average hourly wage for a TSA I-Band level employee is calculated by dividing the average annual salary of an I-Band employee (\$76,310) by the total annual work hours (2,080). TSA calculates an average loaded hourly wage of \$36.69 per I-Band employee.

To create a weighted hourly wage of an average participant, the wages are averaged based the percentages of the participants of the program. TSA calculates a weighted hourly wage of \$42.17 for each participant taking the one hour survey [(68% law enforcement officers x \$44.75) + (32% TSA I-Band employees x \$36.69)].

TSA calculates an annual hour burden cost of \$7,590.74 for participants to complete the one hour survey for this program (\$42.17 x 180 participants).

13. Provide an estimate of the capital and start-up costs.

There are no capital and start-up costs for this collection of information.

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 annualized cost to the Federal Government is estimated to be \$9,085.91. This estimate, calculated using loaded hourly rates, is based on evaluation review by four Federal employees. The calculations are detailed in Table 1.

Table 1

Position and TSA Pay Band	Loaded Hourly Rate	Minutes to Review	Number of Reviewers	Number of Reviews Annually	Annual Cost to Review
Supervisory Agent in Charge - K	\$84.90	10	1	180	\$2,546.91
Supervisor - J	\$72.29	10	2	180	\$4,337.60
Training Development - I	\$36.69	10	2	180	\$2,201.40
Total Government Cost of Review					\$9,085.91

¹ Bureau of Labor Statistics, Occupational Employment and Wages, May 2014. <http://www.bls.gov/oes/2014/may/oes333051.htm> The fully loaded wage rate is calculated using the percentage of wages to total compensation, 64%, as found in Bureau of Labor Statistics, Employer costs per hour worked for employee compensation and costs as a percent of total compensation, March 2015. <http://www.bls.gov/news.release/ecec.t04.htm>

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

The wages have been updated and revised to more accurately reflect the cost burden to the Federal Government.

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 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.