

INFORMATION COLLECTION SUPPORTING STATEMENT

BASELINE ASSESSMENT FOR SECURITY ENHANCEMENT (BASE) PROGRAM

1652-0062

- 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).**

Under the Aviation and Transportation Security Act (ATSA)¹ and delegated authority from the Secretary of Homeland Security, TSA has broad responsibility and authority for “security in all modes of transportation ... including security responsibilities ... over modes of transportation that are exercised by the Department of Transportation.”² In exercising its authority, TSA can assess threats to transportation; develop policies, strategies, and plans for dealing with threats to transportation security; and inspect, maintain, and test security facilities, equipment, and systems.³ For example, consistent with this authority, TSA is the federal agency responsible for “assess[ing] the security of each surface transportation mode and evaluat[ing] the effectiveness and efficiency of current Federal Government surface transportation security initiatives.” EO 13416, section 3(a) (Dec. 5, 2006). While many surface transportation entities have security and emergency response plans or protocols in place, no single database exists, nor is there a consistent approach to evaluating the extent to which security programs are in place across the surface transportation domain.

TSA has met this assessment requirement through the Baseline Assessment for Security Enhancement (BASE) program, which provides a domain awareness, prevention, and protection program in support of TSA’s and the Department of Homeland Security’s (DHS) missions. TSA initially developed the BASE program for public transportation systems to evaluate the status of security and emergency response programs throughout the nation and, based on the program’s success, expanded it into the highway transportation domain.⁴ The BASE is a completely voluntary program, with no penalties for declining to participate or for not having any voluntary security elements in place. Specifically, a BASE review assesses the security measures of a transportation system and gathers data used by TSA to address its responsibilities, such as evaluating “effectiveness and efficiency of current Federal Government surface transportation security initiatives” and developing modal specific annexes to the Transportation Systems Sector Specific Plan that include “an identification of existing security guidelines and requirements and any security gaps....” EO 13416, Sec. 3(c) (i).

¹ Pub. L. 107-71 (Nov. 19, 2001).

² 49 U.S.C. § 114(d).

³ 49 U.S.C. § 114(f).

⁴ Previously, for highway transportation, TSA met the assessment requirement through Corporate Security Reviews (CSRs) with organizations engaged in transportation by motor vehicles and those that maintain or operate key physical assets within the highway transportation community (DISCONTINUED TSA OMB control number 1652-0036). TSA consolidated these assessment programs within surface modes of transportation under the BASE program, TSA OMB control number 1652-0062.

On February 29, 2016, OMB approved TSA's request for an Emergency Revision to the previously approved (August 24, 2015) BASE collections under TSA OMB control number 1652-0062. TSA sought the Emergency Revision to comply with Section 7 of Pub. L. 114-50, 129 Stat. 490 (Sept. 24, 2015), known as the "Gerardo Hernandez Airport Security Act of 2015" (hereinafter referred to as the "Hernandez Act"). The Hernandez Act requires TSA to gather specific information from passenger transportation agencies and providers with high-risk facilities, regarding incident response plans for active shooters, acts of terrorism, or other security-related incidents that target passengers. TSA is also required to disseminate best practices for security incident planning, management, and training and to establish a mechanism through which to share such practices with passenger transportation agencies nationwide. As the emergency extension expires August 31, 2016, TSA is now seeking renewal of this revised information collection for the maximum three-year approval period.

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's Surface Transportation Security Inspectors (TSIs) are trained to conduct BASE reviews during site visits with security and operating officials of affected transportation systems. These TSIs capture and document relevant information using a standardized electronic checklist. Advance coordination and planning ensures the efficiency and effectiveness of the assessment process. Stakeholders may also obtain a checklist in advance from TSA and conduct self-assessments of their security readiness.

A BASE review evaluates the surface transportation system's security program components using a two-phased approach: (1) field collection of information, and (2) analysis/evaluation of collected information. The information collected by TSA through BASE reviews strengthens the security of evaluated surface transportation systems by supporting security program development (including grant programs), and the analysis/evaluation provides a consistent road map for stakeholders to address security and emergency program vulnerabilities. TSA provides all surface transportation systems that undergo a BASE review with a comprehensive report of results that can be used to identify and prioritize addressing vulnerabilities to enhance security. The report includes a score derived from the checklist, which is category and question-based, and both are weighted. Each category is then scored and the BASE score is an average of all categories.

Specifically, the information collected will be used as follows:

1. To develop a baseline understanding of a transportation system's security and emergency management processes, procedures, policies, programs, and activities against security requirements and recommended security practices issued by TSA and the Department of Transportation (DOT).
2. To enhance a transportation system's overall security posture through collaborative review and discussion of existing security activities, identification of areas of potential weakness or vulnerability, and development of remedial recommendations and courses of action.

3. To identify programs and protocols implemented by a transportation system that represent an “effective” or “smart” security practice warranting the sharing of information across the relevant modal community to foster general enhancement of security.

4. To inform TSA’s development of security strategies, priorities and programs for the most effective application of available resources. In mass transit/passenger rail, the BASE is a supporting element for funding distributed under the Transit Security Grant Program.

- 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 majority of the information collected relevant to a BASE review is through the site visit. During BASE reviews, inspectors receive and document relevant information through electronic means, utilizing an electronic checklist, in compliance with GPEA.

- 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.**

TSA actively monitors information collected by our Federal partners but has found no other collection that can meet the needs of the BASE program. TSA is sensitive to the burden on the industry from complying with requests for information and has taken appropriate steps to avoid overlap where possible. For example, development of the questions used in the BASE programs received input from DOT and its modal administrations as well as industry partners, through the Office of Security Policy and Industry Engagement’s Peer Advisory Group (PAG).

While TSA is the lead federal agency for all modes of transportation, TSA has limited the Highway BASE to non-hazardous material carriers and shippers in order to avoid duplication with the Federal Motor Carrier Safety Administration (FMCSA) assessments for compliance with requirements of the Pipeline and Hazardous Materials Administration (PHMSA).

In addition, there is no duplication with the Federal Transit Administration (FTA). As the FTA focuses on mandatory safety standards while TSA focuses on security assessments.

- 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.**

Although TSA plans to collect information from businesses of all sizes, there is minimal potential burden to small businesses or other small entities.

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

If this collection is not conducted, TSA will be unable to assess current security practices in the public transportation/passenger rail and highway transportation sectors, and will, therefore, be unable to fully exercise its oversight authority as provided for under ATSA and delegated authority from the Secretary of Homeland Security. If the information collection is conducted less frequently, TSA's ability to compare data collected at different sites will be diminished.

In general, the BASE program provides TSA with real-time information on current security practices within the public transportation/passenger rail and highway transportation sectors. This information allows TSA to adapt programs to the changing threat, while incorporating an understanding of the improvements owners/operators make in their security posture, whereas without this information the ability of TSA to perform its security mission would be severely hindered. Additionally, the relationships these face-to-face contacts foster are critical to the Federal Government's ability to quickly reach out to the affected transportation systems to respond to any incidents.

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).***

TSA will conduct this collection in a manner consistent 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 April 14, 2016 (81 FR 22093) and a 30-day notice was published on June 28, 2016 (81 FR 41981). TSA received no comments in response to the notices.

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

TSA will not provide payment or gifts to respondents.

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

While TSA does not offer any assurance of confidentiality, portions of the information provided by respondents and the resulting BASE reviews are designated Sensitive Security Information (SSI), as determined by the TSA SSI Program Office, and are handled in accordance with 49 CFR parts 15 and 1520. In addition, this collection is covered by Privacy Impact Assessment (PIA) for the DHS General Contact Lists. See, DHS/ALL/PIA-006 June 15, 2007.

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 questions of a private or sensitive nature.

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

TSA developed the BASE program for certain surface modes of transportation to evaluate the status of security and emergency response programs throughout the nation. The BASE collection covers Mass Transit and Passenger Rail (MT/PR) and Highway/Motor Carrier transportation systems. The standard BASE collections are conducted by TSA's Surface Transportation Security Inspectors (TSIs) during site visits with security and operating officials of transportation systems. TSA provides estimates of the hour burden costs due to these information collection activities.

Based on the data provided by TSA Office of Security Operations, Surface Compliance Branch, TSA estimates that the average annual number of respondents to this information collection process is 90, resulting in an average of 90 annual responses. TSA also estimates that the total combined respondent annual hour burden incurred is 558. The total annual hour burden cost of this information collection is estimated to be \$44,873.

Calculations:

The average annual number of respondents is calculated by summing the number of MT/PR and Highway entities responding to the standard BASE collections.

$$\begin{aligned} \text{Average number of respondents} &= 40 \text{ MT/PR entities} + 50 \text{ Highway entities} \\ &= 90 \text{ entities per year} \end{aligned}$$

TSIs are accompanied by a Corporate Security Coordinator or Security Manager or by their subordinates in the Safety or Security Office during their site visits. Since the wage rates for these personnel are not readily available, TSA uses the fully loaded average hourly wage rates of General and Operations Managers or Administrative Service Managers in the transportation sector drawn from the BLS database. Accordingly, TSA uses the fully loaded

average hourly wage rate of \$83.00 for MT/PR entities⁵ and \$66.99 for Highway entities.⁶ To estimate the cost associated with each time burden, TSA multiplies these fully loaded average hourly wage rates by their corresponding time burdens.

Standard BASE Collections

The standard BASE collection is an inspector-led process with stakeholder input for completion of the questionnaire. Two TSIs conduct each site visit accompanied by the appropriate personnel in the MT/PR and Highway modes. TSA estimates that the contact time with industry personnel for completion of the standard BASE collection is 11.7 hours per each MT/PR and 1.8 hours per each Highway entity.

Hour burden (MT/PR) = 40 responses x 11.7 hours = 468 hours per year

Hour burden (Highway) = 50 responses x 1.8 hours = 90 hours per year

Hour burden cost (MT/PR) = 468 hours per year x \$83.00 = \$38,844 per year

Hour burden cost (Highway) = 90 hours per year x \$66.99 = \$6,029 per year

Total hour burden due to the standard BASE collections = 558 hours per year

Total hour burden cost due to the standard BASE collections = \$44,873 per year

Table 1: Summary of Information Collection Industry Hour Burden Cost

Activities	Average annual Respondents	Annual Number of Occurrences	Average Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost ⁷
	a	b	$c = a \times b$	d	$e = c \times d$	$f = e \times \text{wage rate}$
Standard BASE Collections						

⁵This wage rate is obtained by taking the average of the fully loaded hourly wage rates of the General and Operations Managers and Administrative Service Managers. For MT/PR entities, the fully loaded hourly average wage rate \$83.00 = [(\$95.16 for General and Operations Managers) + (\$70.83 for Administrative Service Managers)] ÷ 2. Note that each of these fully loaded hourly average wage rates are obtained by multiplying the average hourly wage by the compensation factor. Fully loaded hourly average wage rate \$95.16 = hourly average wage \$61.95 x compensation factor 1.536. Fully loaded hourly average wage rate \$70.83 = hourly average wage \$46.11 x compensation factor 1.536.

Source-hourly average wage: BLS, May 2014 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 482100 – Rail Transportation, 11-1021 General and Operations Managers; 11-3011 Administrative Service Manager. http://www.bls.gov/oes/current/naics4_482100.htm. Accessed on Jan. 27, 2016. Source-compensation factor: BLS Economic News Release March 2015 Employer Costs for Employee Compensation Summary Table 11 for All Full Time Workers Transportation and material moving. 1.536 = \$31.31 in total compensation ÷ \$20.39 in wages and salaries. <http://www.bls.gov/news.release/pdf/ecec.pdf>. Accessed on Jan. 76, 2016.

⁶ Similarly, the fully loaded average hourly wage of \$66.99 for Highway entities is obtained by taking the average of the hourly wage rates of General and Operations Managers and Administrative Service Managers in the various modes of the Highway transportation (NAICS 484000, 485400, 485100, 485200, 485500 and 485900) and multiplying it by the compensation factor 1.536.

⁷ The hour burden costs are calculated using the fully loaded average hourly wage rates of \$83.00 for MT/PR personnel and \$66.99 for Highway personnel for activities in (a) and (b).

MT/PR entities respond to BASE	40	1	40	11.7	468	\$38,844
Highway entities respond to BASE	50	1	50	1.8	90	\$6,029
Total			90		558	\$44,873

Note: Totals may not add due to rounding

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

TSA estimates no costs in addition to the hour burdens discussed above for this information collection. TSA estimates that the average annual number of respondents to this information collection is 90, which results in average annual responses of 90 and average annual hour burden cost of \$44,873.

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 standard BASE collections are conducted by TSIs during site visits. The total cost incurred by the federal government is the sum of TSIs' site visits, per diem, and paperwork costs. Based on the data provided by the TSA Office of Security Operations, Surface Compliance Branch, TSA estimates that the total annual cost incurred by the federal government is \$118,793.

Calculations:

The cost TSA incurs due to this information collection has three components. The first cost component is related to TSI contact time with industry personnel to complete the standard BASE collections during their site visits. The second cost component is related to per diem for TSI site visits. The third cost component is related to the time spent on paperwork (such as compiling the entities responses and preparing reports). To estimate the costs associated with these three cost components, TSA uses the per diem⁸ rate of \$140 (for the second cost component) and the fully loaded average hourly wage of \$30.79 for TSIs⁹ (for the first and second cost components) and multiplies them by the time burden in each cost component.

Standard BASE Collections

Two TSIs conduct each site visit accompanied by the appropriate personnel in the MT/PR and Highway modes. TSA estimates that TSIs' contact time to complete the standard BASE collections is 11.7 hours per each MT/PR and 1.8 hours per each Highway entity. TSA also estimates that TSIs' paperwork time for the standard BASE collections is 12 hours for MT/PR and 6 hours for Highway entities.

TSIs visit MT/PR entities:

Government cost (site visits) = 40 x 11.7 hours x 2 TSIs x \$30.79 = \$28,819 per year
 Government cost (per diem) = 40 x 2 days¹⁰ x 2 TSIs x \$140 = \$22,400 per year
 Government cost (paperwork) = 40 x 12 hours x 2 TSIs x \$30.79 = \$29,558 per year

TSIs visit Highway entities:

Government cost (site visits) = 50 x 1.8 hours x 2 TSIs x \$30.79 = \$5,542 per year
 Government cost (per diem) = 50 x 1 day¹¹ x 2 TSIs x \$140 = \$14,000 per year
 Government cost (paperwork) = 50 x 6 hours x 2 TSIs x \$30.79 = \$18,474 per year

⁸ U.S. General Service Administration (GSA) estimates a national average per diem rate of \$140 for 2016. Source: <http://www.gsa.gov/portal/content/142071>

⁹ TSA uses the FY15 fully loaded average hourly wage rates (from the Office of Security Operations Business Management Office, BMO) for TSA surface security inspectors. \$30.79 is obtained by taking the average wage rates of the 1801-H and 1801-I band positions.

¹⁰ This is an estimate of work days (11.7 total hours ÷ 8 = 1.46 days) a TSI requires to visit each entity. The result is rounded up to 2 days in this calculation.

¹¹ This is an estimate of work day (1.8 total hours ÷ 8) a TSI requires to visit each entity. The result is rounded up to 1 day in this calculation.

Total government cost due to the standard BASE collections = \$34,361 (site visits) + \$84,432 (per diem and paperwork) = \$118,793

Table 2: Summary of Information Collection Government Hour Burden Cost

Activity	Average annual Respondents	Annual Number of Occurrences	Average Annual Responses	Hour Burden per Response	Number of TSIs per Visit	Total Annual Hour Burden	Total Annual Hour Burden Cost
	a	b	c = a x b	d	e	f = c x d x e	g = f x \$30.79
Standard BASE Collections							
TSIs visit MT/PR entities	40	1	40	11.7	2	936	\$28,819
TSIs visit Highway entities	50	1	50	1.8	2	180	\$5,542
Total			90			1,116	\$34,361

Note: Totals may not add due to rounding

Table 3: Summary of Information Collection Government Other Costs

Activity	Average annual Respondents	Number of Visits	Time per Visit (hours)	Time per Visit (days) ¹²	Per Diem/Wage Rate ¹³	Number of TSIs per Visit	Total Annual Cost ¹⁴
	a	B	c	d	e	f	g=a*b*(c or d)*e*f
Standard BASE Collections							
Per Diem: TSIs visit MT/PRs	40	1	11.7	2	\$140	2	\$22,400
Per Diem: TSIs visit Highway Entities	50	1	1.8	1	\$140	2	\$14,000
Paperwork: TSIs visit MT/PRs	40	1	12		\$30.79	2	\$29,558
Paperwork: TSIs visit Highway Entities	50	1	6		\$30.79	2	\$18,474
Total		90					\$84,432

Note: Totals may not add due to rounding

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 program changes from the previously reported information.

¹² For per diem calculation, the time per visit is converted into number of days by dividing the given number of hours by 8 hours working day. E.g. Time per visit, 11.7 hours ÷ 8 hours = 1.46 days (approximately 2 days).

¹³ For 2016, GSA estimates a national average per diem rate of \$140. For costs related to paperwork, TSIs' fully loaded average hourly wage of \$30.79 is used.

¹⁴ The total annual cost is calculated using time per visit (in days) for per diem and time per visits (in hours) for paperwork.

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 statement in Item 19.