

INFORMATION COLLECTION SUPPORTING STATEMENT

TSA infoBoards OMB control number 1652-NEW

- 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 infoBoards was developed by TSA as part of its broad responsibilities and authorities under the Aviation and Transportation Security Act (ATSA)¹, and delegated authority from the Secretary of Homeland Security, for “security in all modes of transportation...including security responsibilities...over modes of transportation that are exercised by the Department of Transportation.”²

The Transportation Security Sector (TSS) includes a wide variety of regulated parties and stakeholders that need to share information with TSA. This information is critical to ensure awareness, prevention, response, and recovery to a transportation security incident.

The TSA infoBoards is a data management system that integrates security-related information and communications at the sensitive security information (SSI) level. It provides an information sharing forum supporting coordination and collaboration with and among TSA’s stakeholders, including industry, Federal agencies, and state and local governments—and it is located in a secure online environment and is accessible from the Homeland Security Information Network (HSIN) and TSA (for TSA staff only). It disseminates mission-critical information to users inside and outside of the TSA organization.

- 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 infoBoards is an online portal allowing authorized users to obtain, post, and exchange information, access common resources, and communicate with similarly situated individuals. TSA infoBoards is primarily used for disseminating (“posting”) TSA mission-critical information, such as Security Directives (SD), compliance status, policy updates and watch

¹ Pub. L. 107-71 (November 19, 2001).

² See 49 U.S.C. 114 (d). The TSA Assistant Secretary’s current authorities under ATSA have been delegated to him by the Secretary of Homeland Security. Section 403(2) of the Homeland Security Act (HAS) of 2002, Pub. L. 107-296, 116 Stat. 2315 (2002), transferred all functions of TSA, including those of the Secretary of Transportation and the Under Secretary of Transportation of Security related to TSA, to the Secretary of Homeland Security. Pursuant to DHS Delegation Number 7060.2, the Secretary delegated to the Assistant Secretary (then referred to as the Administrator of TSA), subject to the Secretary’s guidance and control, the authority vested in the Secretary with respect to TSA, including that in section 403(2) of the HAS.

lists. However, some groups of stakeholders use their communities (“boards”) for collaboration and to share transportation security information. With TSA infoBoards, transportation security industry stakeholders can filter alerts and information based on their particular needs, such as their regulated areas of operation or their treaty relationship.

TSA intends TSA infoBoards to be used primarily by individuals with transportation security responsibilities, such as aircraft operators, airport security coordinators, and international transportation security coordinators. These individuals can voluntarily contact TSA to request access to TSA infoBoards; TSA does not require participation in TSA infoBoards.

TSA will collect two types of information through TSA infoBoards. The collection is voluntary. TSA infoBoards users are not required to provide all information requested—however, if users choose to withhold information, they will not receive the benefits of TSA infoBoards associated with that information collection.

1. User registration information. TSA will collect registration information to ensure only those members of the transportation community with a relevant interest in transportation security and with an appropriate level of need to access transportation security information can be allowed onto TSA infoBoards. Such registration information will include the user’s name, professional contact information, agency/company, job title, employer, airport (optional), citizenship, regulatory interest, and employment verification contact information.
2. User’s Choice of TSA infoBoards Communities. TSA will collect information on the user’s choice of TSA infoBoards community(ies) (or “boards”). To meet the requirements for access to SSI under TSA’s regulations, users are asked to submit their desired requestor type and boards so that TSA may assess the user’s qualifications and needs before granting access.
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.]***

TSA infoBoards is an electronic system, accessible through the Internet, and all information is collected electronically; thus this information collection is compliant with GPEA. The basis for adopting an online submission process include ease of accessibility for TSA infoBoards users, ease of information storage, and ease of control over information dissemination. Users can contact their TSA Security Coordinator to request access to TSA infoBoards.

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

As part of its responsibility for homeland security, the Department of Homeland Security (DHS) has created the Homeland Security Information Network (HSIN) as the trusted network for homeland security mission operations to share Sensitive But Unclassified information, such as SSI. Working within this environment, TSA is responsible for transportation security information sharing through the TSA infoBoards. TSA is not aware of any other web portal in the government that is designed to disseminate mission-critical transportation security information in real-time and allows authorized users to obtain, post, and exchange information, access common resources, and communicate with similarly situated individuals. The purpose of TSA infoBoards is unique, and therefore any similar information already available cannot be modified to accomplish it.

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

The collection of information will not have a significant impact on a substantial number of 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.**

TSA infoBoards is an SSI-level system. Therefore, collection of registration information is necessary in order to determine whether users should have access to the system. Thus, failure to collect user registration information will prevent TSA from making this system available to transportation stakeholders as it would not have the ability to evaluate whether transportation stakeholders have a “need-to-know” in order to access and use TSA infoBoards.

Access to this information is necessary assess and improve the capabilities of all transportation modes to prevent, prepare for, mitigate against, respond to, and recover from transportation security incidents. Thus, a failure to collect this information will limit TSA’s ability to effectively enable modal operators to respond to and quickly recover after a transportation security incident. Insufficient awareness, prevention, response, and recovery to a transportation security incident will result in increased vulnerability of the U.S. transportation network.

- 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 published a Federal Register notice, with a 60-day comment period, of the following collection of information on March 17, 2016 (81 FR 14471) and a 30-day notice on October 24, 2016 (81 FR 73127). TSA received no comments.

- 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.**

TSA will gather and store all information pursuant to the Privacy Act, as applicable, as well as any information deemed SSI pursuant to 49 CFR Part 1520. This information may be shared in connection with establishing an access account for an individual, or for routine uses identified in DHS/ALL-004 Department of Homeland Security General Information Technology Access Account Records (GITAARS) System of Records (SORN). See 77 FR 70792 (November 27, 2012). The collection is also covered by the Privacy Impact Assessment for the Homeland Security Information Network R3 User Accounts. See DHS/OPS/PIA-008 HSIN Release 3 User Accounts.

- 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, sensitive nature.

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

TSA estimates there are 10,000 total annual users³ for the TSA infoBoards predecessor system, TSA WebBoards. TSA estimates that approximately 40% of these users are TSA employees⁴, and thus, will not be considered users for the purposes of this ICR. The

³ TSA Office of Information Technology projects the number of annual users of TSA infoBoards based on the number of annual users for TSA's previous system, TSA WebBoards, for the previous three years. TSA WebBoards was a collection which did not trigger the Paperwork Reduction Act. It was discontinued and replaced by TSA infoBoards, which information collection requires the request of an OMB control number.

⁴ TSA Office of Information Technology estimate based from the past three years of the TSA WebBoards system.

remaining 60%, or 6,000 industry users, will be considered to estimate the hour and cost burdens associated with this collection.

TSA estimates that industry users will spend approximately 1 hour per year for responses⁵. TSA calculates a total annual hour burden of 6,000 hours for this ICR (6,000 users x 1 hour per response).

The majority of industry users of TSA's predecessor system, TSA WebBoards, were in managerial roles. TSA assumes this will remain constant with the TSA infoBoards system. Using this assumption, TSA calculates a compensation rate of \$98.24⁶ for each respondent.

TSA calculates the total annual hour burden cost estimate for TSA infoBoards users by multiplying the number of annual responses by the compensation rate for each respondent. TSA estimates a total annual hour burden cost estimate of \$589,440 for TSA infoBoards system users (6,000 annual responses x \$98.24).

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

There are no capital or start-up costs associated with 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.

TSA's new infoBoards system will be mostly funded by DHS since TSA will operate its system through the overall DHS HSIN system. Additional capital costs for TSA infoBoards would only apply if TSA exceeds its allowed data limit. TSA does not anticipate exceeding its data limit on the TSA infoBoards system, and thus, will not account for additional capital expenses for this purpose.

TSA does anticipate a one-time cost in the first year of this ICR for migrating the data that is currently in TSA WebBoards over to the new TSA infoBoards system. TSA calculates a one-time cost of \$91,080 for labor and start-up expenses for the TSA infoBoards system (\$5,520 for scoping and planning + \$85,560 for migration expenses)⁷.

TSA will have employees dedicated to monitor the TSA infoBoards system on a monthly basis. TSA estimates a burden of approximately 96 hours per year⁸ for an employee to monitor the infoBoards system. TSA uses an hourly compensation rate of \$66.80⁹ for an

⁵ TSA Office of Information Technology estimate based on completion time for the previous TSA WebBoards system.

⁶ BLS NAICS 11-0000 Management Occupations, Management of Companies and Enterprises Hourly Mean Wage of \$68.57 factored with BLS compensation load factor of 30.2% ($\$68.57 \text{ Wage Rate} \div [1 - 30.2\%] = \98.24 hourly compensation wage rate). BLS NAICS 11-0000 wage can be found at http://www.bls.gov/oes/current/naics3_551000.htm. BLS compensation load factor can be found at <http://www.bls.gov/news.release/ecec.nr0.htm>.

⁷ TSA program office estimate

⁸ TSA program office estimates an employee will spend approximately 8 hours per month maintaining the TSA infoBoards system to ensure TSA stays within its data limit. This estimate is based on TSA's current method to monitor/maintain TSA's predecessor system, TSA WebBoards.

⁹ TSA program office is staffed with both I or J band employees who will be responsible for monitoring the TSA infoBoards system. TSA calculates the compensation rate by averaging a fully loaded compensation rate for both GS 13 and GS 14 employees (\$127,506 and \$150,370, respectively). TSA then divides the average, \$138,938, by

employee multiplied by the total number of hours devoted to monitor the TSA infoBoards system.

TSA calculates an annual cost of \$6,413 (96 hours per year x \$66.80) for monitoring the TSA infoBoards system.

Additionally, TSA estimates costs to DHS for the infoBoards system to account for additional system usage created by the new TSA system. TSA researched the IT costs for DHS to maintain HSIN and found that DHS will spend approximately \$28,387,333 annually over the next three years¹⁰. TSA estimates that approximately 10% of the DHS system will be occupied by TSA infoBoards. TSA estimates an annual cost of \$2,838,733 (\$28,387,333 x 10%) to DHS for the infoBoards system.

TSA calculates an annual cost of \$2,936,226 (\$91,080 labor and start up + \$6,413 monitoring + \$2,838,733 infoBoards system) to the Federal Government for this ICR.

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

This is a new collection, thus no changes or adjustments have been reported.

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.

User registration information will not be published.

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.

Not applicable.

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

Not applicable.

2,080 hours. TSA Office of Finance and Administration Forecasted FY2016 compensation for GS 13-14 levels.

¹⁰ Costs are based on the DHS Enterprise Architecture Information Repository website which projects DHS HSIN costs for three years. TSA calculates an average cost of the projected three years. The website is not publicly accessible.