INFORMATION COLLECTION SUPPORTING STATEMENT

Transportation Worker Identification Credential
1652-0047
Exp. 07/31/2017

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 Transportation Security Administration (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 field of transportation. 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, facial photograph, and other biographic and biometric 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 (USCG) 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 USCG on January 25, 2007 applicable to the maritime transportation sector that requires this information collection. On September 28, 2016, TSA published its interpretation of the "field of transportation" in the Federal Register pursuant to 6 U.S.C. § 469(a). With this notice, TSA clarified the individuals from whom it may collect and retain fees to recover vetting costs.

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. MTSA requires all credentialed merchant mariners to hold a TWIC®. 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 may be included in this population. These licensed drivers may not necessarily access secure areas of a facility or vessel. Also, there are 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. The information collected is the minimum amount required to establish the identity of the individual and to perform the various background checks required by TSA. Data is collected during an optional pre-enrollment step and at the time of in-person enrollment. Among the records checks required by TSA are a criminal history records check (CHRC), a check of intelligence databases, and an immigration check.

Also, TSA conducts an optional survey to capture applicants' overall customer satisfaction with the enrollment process. TSA's service provider 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®. TSA may use the information to determine a TWIC® holder's eligibility to participate in TSA's expedited screening program for air travel, TSA Pre✓®, and the Hazardous Materials Endorsement (HME) Program without requiring an additional background check. Also, individuals in the field of transportation who are authorized to apply for a TWIC® for use as part of other government programs, such as the Chemical Facility Anti-Terrorism (CFATS) program, may apply for a TWIC® and undergo the associated security threat assessment. TWIC® applicants are required to submit their fingerprints, facial photograph, and other biographical and biometric data at enrollment centers designated by TSA. TSA may use this information to expand enrollment options and for other uses, such as advanced identity verification (*e.g.,* use of fingerprints, iris scans, and/or photographs to verify identity). Fingerprints are used to conduct a CHRC using the FBI's Next Generation Identification (NGI) System. The biographical data are used to perform checks for ties to terrorism, as well as searches against immigration and citizenship-related databases. Once the background assessment is complete and it has been determined that the applicant does not pose a security risk, TSA issues a TWIC® card with the individual's name and photograph printed on it. Applicants may pick up and activate their TWIC® at an enrollment center that is specified by the applicant during the enrollment process. Also, applicants may select to have their TWIC® activated and mailed to their home (or designated address) without a requirement to return to the enrollment center. The contact information collected by TSA, to include a physical address, phone number(s), or email address, is used to notify the applicant when their TWIC® is available to be picked up and activated or to deliver the activated TWIC® to a designated address.

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 service provider review the customer satisfaction results and enrollment center operations reporting, among other measures, designed to gauge the effectiveness and efficiency of the program on a weekly and monthly basis as part of STA program enrollment service reviews. 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 choose 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 service provider, which provides enrollment and activation functions) administer in-person enrollment, which involves the creation of an electronic enrollment record. Biometrics, including fingerprints, facial photograph, and iris scans are captured electronically and are part of the enrollment record. Proof-of-identity and immigration status documents are scanned and stored electronically by TSA's enrollment service provider with secure authorized channeling services. When all data has been collected, the enrollment record is transmitted to TSA's Technology Infrastructure Modernization (TIM) system, 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. For cases in which an applicant has already received a comparable threat assessment from DHS, including those for a, Hazardous Materials Endorsement (HME) holder or a Free and Secure Trade (FAST) card holder, the biographic and biometric information is collected in order for the TSA to ensure that applicants do not apply for multiple TWICs® 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. Individuals in the field of transportation who are authorized to apply for a TWIC® for use as part of other government programs, such as the Chemical Facility Anti-Terrorism (CFATS) program, may apply for a TWIC® and undergo the associated security threat assessment.[1]

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[1] The DHS National Protection and Program Directorate (NPPD) issued regulations that apply to certain chemical facilities that require affected individuals to undergo background checks (6 CFR § 27.230). Affected individuals who are required to undergo background checks to satisfy NPPD requirements may apply for a TWIC® if he/she is otherwise eligible to apply for a TWIC®. TSA has determined that individuals engaged in an activity regulated by the U.S. Department of Transportation (DOT), TSA, or the USCG. (Note: Title 6 U.S.C. 469(a) authorizes DHS to charge reasonable fees for providing credentialing and background investigations in the field of transportation.

As a DHS component, TSA is a stakeholder and active participant in DHS-wide efforts to enhance identity standards, identity validation & verification and person-centric identity management. TSA collaborates with the DHS Office of Biometric Identity Management (OBIM) Office of Futures Identity on identity management applications, initiatives, and programs, among other use cases. Whereas DHS analyses have found that Offices and Components manage their Person-Centric Identity Management-related programs largely independently, OBIM is leading departmental efforts to establish a common identity standards and an enterprise strategy to enable a more standardized approach to identity management, including governance, data sharing, and expanded biometrics and identity resolution. To augment such departmental efforts, TSA is reviewing its STA program identity practices and considering procedures to enhance identity assurance for its populations to ensure consistency in identity validation and verification and increase the maturity level of all programs from an identity assurance level. TSA is engaged with the National Institute of Standards and Technology (NIST) and National Information Exchange Model (NIEM) Program Management Office, among others, on biometric and biographic capture, storage and data sharing requirements and practices.

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 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 will be unable to measure applicant customer satisfaction and the service provider will be unable to assess and report performance for TWIC® enrollment service reviews.

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, TSA captures 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.

According to 81 FR 66671, the "field of transportation" under 6 U.S.C. 469(a) includes an individual, activity, entity, facility, owner, or operator that is subject to regulation by TSA, DOT, or USCG, and individuals applying for trusted traveler programs.)

8. ***Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

When the TWIC® program was established in 2007, TSA conducted a prototype of the TWIC® enrollment and card issuance procedures. Volunteer transportation workers enrolled and provided data that assisted in the successful deployment of the TWIC® system, including enrollment and issuance 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 850,000 applicants. Since the program's inception, the program has performed more than 4.1 million enrollments and maintains approximately 2.1 million active TWIC® cards.

TSA collaborates with U.S. Coast Guard and solicits input from maritime industry and other stakeholders to assess the population for initial enrollments as well as renewals; however, the transient nature of this workforce presents a challenge to its estimation. 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.

TSA published a 60-day notice to seek approval of a revised information collection for the TWIC® program in the Federal Register on October 24, 2016 (81 FR 73126) and a 30-day notice on March 21, 2017 (82 FR 14521).

TSA received a comment on the 60-day notice from the Chemical Facility Security News blog, inquiring about the limited detail in the notice on TSA's burden estimate. TSA responded to the commenter that supporting calculations and explanations are included in the Information Collection Supporting Statement. Based on historical TWIC® information, TSA provided detailed burden estimates for enrollments, replacements, card issuance, appeals/waivers, and customer satisfaction surveys (see question 12).

The commenter inquired about the TWIC® enrollment estimates authorized for other government programs, including the Chemical Facility Anti-Terrorism (CFATS) program. TSA responded to the commenter that supporting calculations and explanations are included in the Information Collection Supporting Statement. TSA enrollment estimates for other government program applicants authorized under 6 U.S.C. 469(a) and 81 FR 66671 are accounted for through an annual 5% increase in TWIC® New Enrollment/Replacement estimates (see question 12, Table 1).

Finally, the commenter inquired about the impact of expanded enrollment options, removal of the Extended Expiration Date (EED) TWIC®, and revised fee collection on TWIC® burden estimates. TSA responded to the commenter that the expanded enrollment options for additional comparability or eligibility determinations remain in development. TSA monitors

and reviews the enrollment burden for all TWIC® applicants, including enrollment time. Pending authorization of expanded enrollment options, TSA will monitor and revise this collection on the expanded enrollment impact to the TWIC® burden estimates. TSA responded to the commenter that calculations of cost related to workers' time to order an EED TWIC® were removed from the collection. TSA's revised burden estimates include the re-enrollment date estimates for previous EED applicants. TSA responded to the commenter that the TWIC® fee change was established on October 1, 2016. Due to the recent fee change, TSA based its New Enrollment estimates on historical enrollment data captured following previous changes to the TWIC® fee. TSA reports negligible enrollment variances based on past fee changes. Since the October 2016 fee change, TSA reports that new enrollments are consistent with prior year statistics.

TSA received a comment on the 60-day notice from the Institute of Makers of Explosives (IME), a non-profit founded to provide information and recommendations concerning the safety and security of commercial explosive materials. The commenter stated that IME supports "TSA's ability to reuse PII collected under one Federal vetting program to satisfy redundant clearances under other equivalent Federal vetting programs." Also, the commenter noted that "TSA's intuitive and encompassing definition [of the field of transportation], based on agency jurisdiction, will allow the TWIC® to meet multiple vetting needs." TSA recognizes IME's comments on the Information Collection Revision, and TSA appreciates continued feedback from IME, as well as other stakeholders, on its STA programs.

TSA received a comment on the 30-day notice from the International Liquid Terminals Association (ILTA), an international trade association that represents 84 commercial operators of aboveground liquid storage terminals serving various modes of bulk transportation across all 50 states in the U.S. The commenter stated that ILTA supports this information collection revision "because it removes unnecessary duplication across federal programs that require security vetting of individuals." ILTA noted that TSA's revision "is helpful to reduce the time and cost of meeting [its] vetting needs by allowing a TWIC® to meet requirements for multiple programs." TSA appreciates ILTA's comments on the revisions, and it welcomes future input from ILTA on TWIC® as well as other STA programs.

TSA received a comment on the 30-day notice from the American Fuel and Petrochemical Manufacturers (AFPM). An active TWIC® stakeholder with member organizations subject to MTSA requirements, AFPM is a national trade association representing nearly 400 companies that encompass the U.S. refining and petrochemical manufacturing capacity. The commenter stated that "AFPM supports the proposed revision to [the Information Collection Revision] because it would eliminate unnecessary duplication across federal programs that require security vetting of individuals." The commenter highlighted that "individuals in the field of transportation who are authorized to apply for a TWIC® would no longer have to undergo duplicative background checks in connection with other government security programs, such as the CFATS program." TSA recognizes AFPM's engagement on this revision. TSA responded to the commenter with appreciation for its feedback as well as information on TSA's comparability for STA programs. TSA offers comparability for the TWIC®, Hazardous Materials Endorsement, and Free and Secure Trade Programs. TSA continues to seek opportunities to provide comparability to other credentialing and vetting programs. However, based on statutory requirements and technology challenges associated with STA programs, TSA is unable to offer comparability to other programs at this time.

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 is committed to protecting privacy and securing personal information. TSA collects and protects TWIC® applicant information consistent with the principles of the Privacy Act of 1974, E-Government Act of 2002 and Federal Records Act. The DHS Privacy Office publishes privacy risks, protections, and methods at https://www.dhs.gov/compliance. In addition, this collection is covered by a Privacy Impact Assessment, DHS/TSA/PIA-12 Transportation Worker Identification Credential Program (October 5, 2007); and a System of Records Notice, DHS/TSA—002 Transportation Security Threat Assessment. *See* 79 FR 46862 (August 11, 2014). For TWIC® access control and electronic card reader privacy risks, the USCG publishes PIAs available from the DHS Privacy Office.

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 transportation worker population are based on historical data that TSA compiled during the previous four years of the TWIC® program. As displayed in the following table, TSA estimates 519,710 total annual respondents as well as 31,183 TWIC® replacements.[2]

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

Calendar Year (CY)	New Enrollments	Replacements
Column	A	B
1 (2017 Estimate)	516,732	31,004
2 (2018 Estimate)	496,558	29,793
3 (2019 Estimate)	491,567	29,494
4 (2020 Estimate)	521,815	31,309
5 (2021 Estimate)	571,878	34,313
Total	**2,598,550**	**155,913**

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[2] TSA enrollment estimates for other government program applicants authorized under 6 U.S.C. 469(a) and 81 FR 66671 are included in TWIC® New Enrollment/Replacement estimates (see Table 1). Between April 2016 and November 2016, TSA enrolled 236 CFATS program facility personnel who applied for a TWIC®. To establish a baseline, TSA estimated approximately 29.5 enrollments per month. TSA estimates that individuals authorized to apply for a TWIC® for use as part of other government programs may increase. To account for such increases, TSA estimated a five percent increase, year-over-year, in the CY 2016 baseline. TSA plans to monitor other program enrollments and update TWIC® Enrollment/Replacement in future collection submissions.

Calendar Year (CY)	New Enrollments	Replacements
Annualized	519,710	31,183

There are three main activities where the transportation worker population would provide information: pre-enrollment, enrollment, and the customer satisfaction survey. The table below shows the percentage of workers that likely will participate in each activity and the amount of time it takes to complete each activity. The time for each activity is derived from a system average measured by the current UES Service Provider.

Table 2: Estimated Time and Percentage of Applicants for Providing TWIC® Enrollment Data

Type of Enrollment Data Submission	Estimated % of Total TWIC® Applicants	Estimated Time Burden per Applicant (Minutes)
Online pre-application/pre-enrollment followed by in-person visit to an enrollment center	5%	30
In-person at an enrollment center with no pre-enrollment	95%	23
Provide Enrollment Feedback via Customer Satisfaction Survey	35%	2.5

Hour burden for applicants choosing to pre-enroll

The first factor in the calculation of the cost of workers' time was to estimate the time required to apply for a TWIC® using pre-enrollment. TSA calculated this time as the approximate number of transportation workers who select to pre-enroll (5%) multiplied by the actual time required to complete the fields necessary for pre-enrollment (30 minutes) plus the average travel time required to travel to an enrollment center (44 minutes).[3] Adding these two durations together equals the amount of time required to apply for a TWIC® using pre-enrollment (74 minutes or 1.23 hours as shown in column B). The number of enrollment applicants includes the estimated number of new enrollments (column A) from Table 1.

Table 3: Estimates for TWIC® Applicants who Select Online Pre-Application/Pre-Enrollment Followed by In-Person Visit to an Enrollment Center

Calendar Year (CY)	Pre-Enrollment Applicants	Hours to Pre-Enroll per Applicant	Total Hours
Column	A	B	C= A*B
1 (2017 Estimate)	25,837	1.23	31,780
2 (2018 Estimate)	24,828	1.23	30,538
3 (2019 Estimate)	24,578	1.23	30,231
4 (2020 Estimate)	26,091	1.23	32,092
5 (2021 Estimate)	28,594	1.23	35,171
Total	129,928	1.23	159,811

[3] The average travel time was estimated by taking a statistically significant sample portion of enrollments centers of various volume levels and geographic locations and then calculating time average time required by workers who used those facilities to enroll to make a round trip to enroll from their home address.

Calendar Year (CY)	Pre-Enrollment Applicants	Hours to Pre-Enroll per Applicant	Total Hours
Annualized	25,986	1.23	31,962

Note: Calculations may not be exact due to rounding in tables.

Hour Burden to those applicants who complete all enrollment activities

The next factor in the calculation of the cost of workers' time was an estimate of the time that workers expend to enroll in the program without using the pre-enrollment option. All of the following time estimates are based on historical data from the TWIC® program unless otherwise noted. TSA estimated this time as the sum of the average roundtrip commute/ travel time, (44 minutes) (see Footnote 1), and the time required to enroll without pre-enrollment from Table 2 (23 minutes). Computing these times equals 67 minutes or 1.12 hours per applicant. This information is captured in Table 4 below.

Table 4: Estimates for TWIC® Applicants who Select not to Pre-Apply/Pre-Enroll and Provide Data In-Person at an Enrollment Center

Calendar Year (CY)	In Person Enrollments with no Pre-Enrollment (95% of Enrollments)	Hours to Enroll per Applicant (67 minutes = 1.12 hours)	Estimated Total Hours
Column	A	B	C (C= A*B)
1 (2017 Estimate)	490,895	1.12	549,802
2 (2018 Estimate)	471,730	1.12	528,338
3 (2019 Estimate)	466,989	1.12	523,028
4 (2020 Estimate)	495,724	1.12	555,211
5 (2021 Estimate)	543,284	1.12	608,478
Total	2,468,622	1.12	2,764,857
Annualized	493,724	1.12	552,971

Note: Calculations may not be exact due to rounding in tables.

Customer Satisfaction Survey Hour Burden (Enrollment)

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 transportation workers that choose to participate in the survey (35% based on historical data) multiplied by the actual time required to complete the electronic survey (2.5 minutes or 0.042 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 5: Estimates for TWIC® Applicants who Select to Respond to an Enrollment Customer Satisfaction Survey

Calendar Year (CY)	Survey Participants	Hours to Complete Survey per Applicant	Total Hours
Column	A	B	C= A*B
1 (2017 Estimate)	180,856	0.042	7,596
2 (2018 Estimate)	173,795	0.042	7,299
3 (2019 Estimate)	172,049	0.042	7,226
4 (2020 Estimate)	182,635	0.042	7,671
5 (2021 Estimate)	200,157	0.042	8,407
Total	**909,492**	**0.042**	**38,199**
Annualized	**181,898**	**0.042**	**7,640**

Note: Calculations may not be exact due to rounding in tables.

In the following table, the totals from Tables 3 to 5 are summarized to derive the total time burden to enroll in the TWIC® program.

Table 6: Total Enrollment Time Burden Estimates for TWIC® Applicants who Select to Respond to an Enrollment Customer Satisfaction Survey

Calendar Year (CY)	Enrollment Burden with Pre-enrollment	Enrollment Burden without Pre-enrollment	Enrollment Survey Burden	Estimated Total Hours
Column	A	B	C	D=A+B+C
1 (2017 Estimate)	31,780	549,802	7,596	589,178
2 (2018 Estimate)	30,538	528,338	7,299	566,175
3 (2019 Estimate)	30,231	523,028	7,226	560,485
4 (2020 Estimate)	32,092	555,211	7,671	594,974
5 (2021 Estimate)	35,171	608,478	8,407	652,056
Total	**159,812**	**2,764,857**	**38,199**	**2,962,868**
Annualized	**31,962**	**552,971**	**7,640**	**592,574**

Note: Calculations may not be exact due to rounding in tables.

Extended Expiration Date (EED)

In 2012, TSA issued an exemption option that permitted eligible TWIC® holders to obtain a replacement card that extended the expiration date of their security threat assessment and TWIC® by three years on payment of a reduced renewal fee. The EED TWIC® was a one-time temporary option intended to provide convenience and cost-savings to applicants pending U.S. Coast Guard (USCG) issuance of the Notice of Proposed Rule Making (NPRM) for the TWIC® Reader Rule (81 FR 57651). While USCG developed this rule, the exemption reduced the burden and costs associated with obtaining a new TWIC® for many workers holding expiring cards. In March 2013, USCG published the NPRM (78 FR 17782). In response to this publication, TSA discontinued the EED TWIC® renewal option on

January 1, 2015, and applicants were required to obtain a five-year TWIC® through the standard renewal process.

Extended Expiration Date Order Burden

Calculations of cost related to workers' time to order an EED TWIC® were removed from the collection. Beginning January 1, 2015, TSA discontinued the EED TWIC® renewal option, and applicants were required to obtain a five-year TWIC® through the standard renewal process.

Card Issuance Hour Burden

The next component in the calculation of the cost of workers' time was an estimate of the actual time that workers expend retrieving their card (either after an enrollment or when getting a replacement card). Currently, there are two options to do this: 1) TWIC® OneVisit allows an applicant to receive a card at their home or address of choice. This option does not have a time burden on the applicant. 2) Applicants may also choose to pick up and activate their cards at an enrollment center.

Currently, 20% of total applicants and 40% of those applicants who request card replacements (from Table 1) pickup and activate their cards at an enrollment center. In the following table, a summary of the number of applicants and those requesting replacement cards who will activate at an enrollment center are calculated.

Table 7: Estimated TWIC® Applicants Activating Cards at an Enrollment Center

Calendar Year (CY)	Full Enrollments - 20%	Replacements - 40%	Estimated Total Card Activations
Column	A	B	C=A+B
1 (2017 Estimate)	103,346	12,402	115,748
2 (2018 Estimate)	99,312	11,917	111,229
3 (2019 Estimate)	98,313	11,798	110,111
4 (2020 Estimate)	104,363	12,524	116,887
5 (2021 Estimate)	114,376	13,725	128,101
Total	**519,710**	**62,365**	**582,075**
Annualized	**103,942**	**12,473**	**116,415**

Note: Calculations may not be exact due to rounding in tables.

Customer Satisfaction Survey Hour Burden (Card Issuance)

After completing the card issuance process, applicants are asked to complete a short, optional electronic customer satisfaction survey (2.5 minutes or .042 hours). In accordance with historical data it is estimated that 35% of total card issuance population (Table 7, Column C) will participate in the optional survey. The Card Issuance Customer Satisfaction Survey burden is captured in Table 8 below.

Table 8: Customer Satisfaction Survey Hour Burden (TWIC® Card Issuance)

Calendar Year (CY)	Total Number of Individuals Picking Up Card At Enrollment Center	Customer Survey Participants (35% of Cards Issued)	Hours to Complete Survey per Individual (2.5 minutes = .042 hours)	Estimated Total Hours
Column	A	B	C	D=B*C
1 (2017 Estimate)	115,748	40,512	0.042	1702
2 (2018 Estimate)	111,229	38,930	0.042	1635
3 (2019 Estimate)	110,111	38,539	0.042	1619
4 (2020 Estimate)	116,887	40,910	0.042	1718
5 (2021 Estimate)	128,101	44,835	0.042	1883
Total	**582,076**	**203,726**	**0.042**	**8557**
Annualized	**116,415**	**40,745**	**0.042**	**1711**

Note: Calculations may not be exact due to rounding in tables.

Total Burden for Card Issuance

TSA 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, TSA added 10 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 62 minutes, or 1.03 hours for this calculation.

Total Card Issuance burden (including enrollments and customer satisfaction surveys) is captured in Table 9 below.

Table 9: Total Estimated TWIC® Card Issuance Time Burden in Hours by Year

Calendar Year (CY)	Total Number of Individuals Picking Up Card At Enrollment Center	Hours per Card Issuance (62 minutes = 1.03 hours)	Total Hour Burden w/o Survey	Survey Hour Burden	Estimated Total Hours
Column	A	B	C= A*B	D	E=C+D
1 (2017 Estimate)	115,748	1.03	119,220	1702	120,922
2 (2018 Estimate)	111,229	1.03	114,566	1635	116,201
3 (2019 Estimate)	110,111	1.03	113,414	1619	115,033
4 (2020 Estimate)	116,887	1.03	120,394	1718	122,112
5 (2021 Estimate)	128,101	1.03	131,944	1883	133,827
Total	**582,076**	**1.03**	**599,538**	**8557**	**608,095**

Calendar Year (CY)	Total Number of Individuals Picking Up Card At Enrollment Center	Hours per Card Issuance (62 minutes = 1.03 hours)	Total Hour Burden w/o Survey	Survey Hour Burden	Estimated Total Hours
Annualized	116,415	1.03	119,908	1711	121,619

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.

TSA estimated the number of appeals and waivers by taking the total number of yearly enrollments estimated above (Table 1) and applying the actual 2.5 percent disqualification rate and 31.5 percent appeal rate (*e.g.,* those individuals that requested an appeal or a waiver after initially being denied) that was recorded between August 1, 2015 and July 31, 2016. Please note that waivers and appeals are not applicable for replacement requests.

Additionally, TSA estimated that each appeal and waiver requires six hours to complete. Individuals who request appeals and waivers must perform a variety of activities. At minimum, they must write a letter to TSA, and they 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. TSA provided the estimates for the yearly hours of appeals and waivers below in Table 10.

Table 10: Estimated TWIC® Appeal/Waiver Burden by Year

Calendar Year (CY)	Enrollments	% of Applicants Initially Deemed Ineligible	% of Applicants Initially Deemed Ineligible that request an Appeal/Waiver	Estimated Total # of Applicants to Request an Appeal/Waiver	Estimated Time Burden in hours per Applicant for Appeal/Waiver	Estimated Total Appeal/ Waiver Hours
Column	A	B	C	D=(A*B*C)	E	F=D*E
1 (2017 Estimate)	516,732	2.5%	31.5%	4069	6	24,414
2 (2018 Estimate)	496,558	2.5%	31.5%	3910	6	23,460
3 (2019 Estimate)	491,567	2.5%	31.5%	3871	6	23,226
4 (2020 Estimate)	521,815	2.5%	31.5%	4109	6	24,654
5 (2021 Estimate)	571,878	2.5%	31.5%	4504	6	27,024
Total	2,598,550	2.5%	31.5%	20,463	6	122,778
Annualized	519,710	2.5%	31.5%	4093	6	24,556

Note: Calculations may not be exact due to rounding in tables.

Totals

Table 11 presents the annual number of estimated responses to the TWIC® program. 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. The annualized number of total responses is 862,861.

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Table 11: Estimated Total Number of Responses by Year

Calendar Year (CY)	Pre-Enrollment Applicants (5% of Enrollments)	In Person Enrollments with no Pre-Enrollment (95% of Enrollments)	Customer Survey Participants (35% of Enrollments)	Estimated Total Card Activations	Customer Survey Participants (35% of Cards Issued)	Estimated Total # of Applicants to Request an Appeal/Waiver	Estimated Total Responses
Column	A	B	C	D	E	F	G=A+B+C+D+E+F
1 (2017 Estimate)	25,837	490,895	180,856	115,748	40,512	4,069	857,917
2 (2018 Estimate)	24,828	471,730	173,795	111,229	38,930	3,910	824,422
3 (2019 Estimate)	24,578	466,989	172,049	110,111	38,539	3,871	816,137
4 (2020 Estimate)	26,091	495,724	182,635	116,887	40,910	4,109	866,356
5 (2021 Estimate)	28,594	543,284	200,157	128,101	44,835	4,504	949,475
Total	**129,928**	**2,468,622**	**909,492**	**582,076**	**203,726**	**20,463**	**4,314,307**
Annualized	**25,986**	**493,724**	**181,898**	**116,415**	**40,745**	**4,093**	**862,861**

Note: Calculations may not be exact due to rounding in tables.

Table 12 below displays the total annual hour burden estimated for the TWIC® program to TWIC® applicants. The annualized burden is 738,748 hours.

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Table 12: Estimated Total Time Burden by Year

Calendar Year (CY)	Total Enrollment Burden in Hours	Total Card Issuance Burden in Hours	Total Appeal/Waiver Burden in Hours	Estimated Total Hours
Column	A	B	C	D=A+B+C
1 (2017 Estimate)	589,178	120,922	24,414	734,514
2 (2018 Estimate)	566,175	116,201	23,460	705,836
3 (2019 Estimate)	560,485	115,033	23,226	698,744
4 (2020 Estimate)	594,974	122,112	24,654	741,740
5 (2021 Estimate)	652,056	133,827	27,024	812,907
Total	**2,962,868**	**608,095**	**122,778**	**3,693,741**
Annualized	**592,574**	**121,619**	**24,556**	**738,748**

Note: Calculations may not be exact due to rounding in tables.

Opportunity Cost
TSA reviewed information from the USCG TWIC® Reader Rule (81 FR 57651) to use identical wages for mariners and the occupations that the USCG used in their regulatory cost analysis. Additionally, TSA included truck drivers who would access the ports and could have a TWIC®. TSA retrieved the Bureau of Labor Statistics' (BLS) hourly rates and populations.

To account for the amount of workers by category, TSA calculated a weighted average wage for the five occupations that resulted from this analysis. This resulted in a weighted average TWIC® wage rate of $20.65. However, the $20.65 does not account for benefits, leave, and other compensation costs. Therefore, TSA also calculated a total compensation factor based on BLS data, to create a "loaded" wage.

The final TWIC® loaded hourly wage, $31.71, was a result of multiplying $20.65 (weighted average wage rate) by 1.5356 (load factor). The calculations are shown below in Table 13.

Table 13: Weighted Average TWIC® Card Holder Wages

Occupation Title	Estimated Population	Average Hourly Wage Rate	Compensation Factor[4]	Total Wage Cost
Column	A	B	C	D=A*B*C
Sailors and Marine Oilers	13,350	$21	1.5356	$430,505
Captains, Mates, and Pilots of Water Vessels	15,370	$39	1.5356	$920,485
Motorboat Operators	400	$20	1.5356	$12,285
Ship Engineers	4,920	$36	1.5356	$271,985
Driver/Sales Workers and Truck Drivers	1,678,280	$20	1.5356	$51,543,335
Total	**1,712,320**			**$53,178,595**
Average Hourly Wage Rate			**1.5356**	**$31.71[5]**

Note: Calculations may not be exact due to rounding in tables.

TSA multiplied the TWIC® hour burden by $31.71 to estimate the hour burden costs. This results in an annualized opportunity cost of $23 million. The calculations are shown below in Table 14.

Table 14: Opportunity Cost

Calendar Year (CY)	Estimated Total Hours	Average Hourly Wage Rate	Total Lost Wages Cost
Column	A	B	C=A*B
1 (2017 Estimate)	734,514	$31.71	$23,291,439
2 (2018 Estimate)	705,836	$31.71	$22,382,060
3 (2019 Estimate)	698,744	$31.71	$22,157,172
4 (2020 Estimate)	741,740	$31.71	$23,520,575
5 (2021 Estimate)	812,907	$31.71	$25,777,281
Total	**3,693,745**	**$31.71**	**$117,128,527**
Annualized	**738,748**	**$31.71**	**$23,425,705**

[4] To account for the amount of workers by category, TSA calculated a weighted average wage for the 5 occupations. This resulted in a weighted average TWIC® wage rate of $20.65. However, the $20.65 does not account for benefits, leave and other compensation costs. Therefore, TSA also calculated a total compensation factor based on BLS data, to create a "loaded" wage. The compensation factor was calculated by dividing $31.31 in total compensation by $20.39 in wages and salaries. The compensation factor is 1.5356. Source: BLS Economic News Release December 2015 Employer Costs for Employee Compensation Summary Table 11 – Private Industry Workers, Full Time Production, Transportation and Material Moving. http://www.bls.gov/news.release/archives/ecec_12092015.htm (accessed on Aug. 25, 2016).

[5] The final TWIC® loaded hourly wage, $31.71, was a result of multiplying $20.65 (weighted average wage rate) by 1.5356 (load factor). TSA multiplied the TWIC® hour burden by $31.71 to estimate the hour burden costs. Source-hourly average wage: BLS, May 2015 National Industry-Specific Occupational Employment and Wage Estimates. Released on March 30, 2016. www.bls.gov/oes/tables.htm. (Accessed on 08/10/2016).

Note: Calculations may not be exact due to rounding in tables.

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[6] of the program, prorated over the expected number of applicants. TWICs® are valid for a period of five years. The five-year renewal of a TWIC® costs the same as the initial enrollment. Based on required fee studies, TSA determined that the information collection and credential issuance segments of the TWIC® fee will be $34.50, plus $10.00 for the FBI CHRC fee, and $80.75 for TSA to complete the threat assessment and produce the credential, for a total of $125.25. The total enrollments number includes both initial and the renewal enrollees and has a total five-year cost of $325 million (Table 15).

This results in an annualized cost of $65 million. The calculations are shown below in Table 15.

Table 15: Enrollment Fees

Calendar Year (CY)	TWIC Annual Enrollments	TWIC Annual Enrollment Fee	Total TWIC Program Annual Enrollments Fee
Column	A	B	C=A*B
1 (2017 Estimate)	516,732	$125.25	$64,720,683
2 (2018 Estimate)	496,558	$125.25	$62,193,890
3 (2019 Estimate)	491,567	$125.25	$61,568,767
4 (2020 Estimate)	521,815	$125.25	$65,357,329
5 (2021 Estimate)	571,878	$125.25	$71,627,720
Total	**2,598,550**	**$125.25**	**$325,468,388**
Annualized	**519,710**	**$125.25**	**$65,093,678**

Note: Calculations may not be exact due to rounding in tables.

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 $9 million (Table 16).

This results in an annualized cost of $1.9 million. The calculations are shown below in Table 16.

Table 16: TWIC® Card Replacement Fees

Calendar Year (CY)	Replacements	Fee per Replacement	Total
Column	A	B	C=A*B
1 (2017 Estimate)	31,004	$60.00	$1,860,235

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[6] According to Office of Management and Budget's Circular A-4, transfer payments are monetary payments from one group to another that do not affect total resources available to society. To the extent that fee revenue for TWIC enrollments are in excess of the Federal costs of administering the TWIC program, the difference between costs and revenue would be transfer payments. For more information, visit: https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A4/a-4.pdf

Calendar Year (CY)	Replacements	Fee per Replacement	Total
2 (2018 Estimate)	29,793	$60.00	$1,787,608
3 (2019 Estimate)	29,494	$60.00	$1,769,642
4 (2020 Estimate)	31,309	$60.00	$1,878,533
5 (2021 Estimate)	34,313	$60.00	$2,058,762
Total	**155,913**	**$60.00**	**$9,354,780**
Annualized	**31,183**	**$60.00**	**$1,870,956**

Note: Calculations may not be exact due to rounding in tables.

If an individual needs to request an appeal or waiver, they will likely need to request copies of their supporting documents. The TWIC® program estimates the cost for these copies to be $1 (Table 17).

This results in an annualized cost of approximately $4,000. The calculations are shown below in Table 17.

Table 17: Estimated Cost of Copies by Year

Calendar Year (CY)	Replacements	Cost per Copy	Total
Column	A	B	C=A*B
1 (2017 Estimate)	4,023	$1.00	$4,023
2 (2018 Estimate)	3,866	$1.00	$3,866
3 (2019 Estimate)	3,827	$1.00	$3,827
4 (2020 Estimate)	4,063	$1.00	$4,063
5 (2021 Estimate)	4,453	$1.00	$4,453
Total	**20,232**	$1.00	**$20,232**
Annualized	**4,046**	$1.00	**$4,046**

Note: Calculations may not be exact due to rounding in tables.

Totals

Table 18 below shows the estimated annual costs. The annualized estimate of enrollments, renewals, appeals, and waivers is $67 million.

Table 18: Total Fee Costs

Calendar Year (CY)	Total Application Enrollment Cost Burden	Total Replacement Cost Burden	Total Appeal/ Waiver Cost Burden	Total Cost
Column	A	B	C	D=A+B+C
1 (2017 Estimate)	$64,720,683	$1,860,240	$4,023	$66,584,941
2 (2018 Estimate)	$62,193,890	$1,787,580	$3,866	$63,985,326
3 (2019 Estimate)	$61,568,767	$1,769,640	$3,827	$63,342,272
4 (2020 Estimate)	$65,357,329	$1,878,540	$4,063	$67,239,900
5 (2021 Estimate)	$71,627,720	$2,058,780	$4,453	$73,690,970
Total	**$325,468,388**	**$9,354,780**	**$20,232**	**$334,843,409**
Annualized	**$65,093,678**	**$1,870,956**	**$4,046**	**$66,968,682**

Note: Calculations may not be exact due to rounding in tables.

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 TSA TWIC® program is funded entirely by applicant fees and is not augmented by appropriated funding (see Section 13). The TWIC® fee covers applicant enrollment, vetting, adjudication, redress procedures and credentialing, and other operational costs associated with the program based on population estimates. Costs are estimated using point estimates accounting for approximately 44 percent of the potential range of program costs based on the program requirements and risks for each of the program's major cost categories. Where the TWIC® is a five-year credential, it is essential that the TWIC® revenue model ensures that the program remains viable for the lifetime of the credential. In consideration of the TWIC® program's revenue model, TSA's annualized cost for the Information Collection Request is $65,093,678 (see Table 15). The forecast provides the basis for estimating program costs to include enrollment services, security threat assessment, maintenance and modernization of backend IT systems, and credential maintenance services.

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

TSA revised its burden estimates from the previous Information Collection Request submission in 2013. Data used in this submission are based on increased actual costs evaluated by the TWIC® program resulting in more refined estimates. TSA removed hour and cost burden related to the previously provided three-year extended TWIC® option (EED TWIC®) as described above (see section 12). In addition, the TWIC® program updated its

user fee structure in line with regulatory requirements. Since the TWIC® program's previous submission in 2013, TSA and its service provider implemented several process improvements to enhance the pre-enrollment and enrollment. TSA expanded the collection and use of biographic and biometric information for other enrollment options, including the expansion of enrollment options for additional comparability or eligibility determinations for other programs.

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.