

INFORMATION COLLECTION SUPPORTING STATEMENT

TRANSPORTATION SECURITY ADMINISTRATION, END OF COURSE LEVEL 1 EVALUATION – INSTRUCTOR-LED CLASSROOM TRAINING OMB control number 1652-0041 EXP. 9/30/2018

- 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.)***

Consistent with requirements in the Government Performance and Results Act of 1993 (GPRA) (Pub. L. 103-62; 107 Stat. 285, Aug. 3, 1993), the TSA Office of Training and Development (OTD) and the Canine Training Center (CTC) evaluates the instruction it delivers, through a range of courses, to train canines and their handlers. These handlers are primarily TSA personnel and State and local civilian personnel working for law enforcement agencies that are responsible for the security at airports throughout the United States. The courses include the CTC Explosives Detection Canine Handler Course, Passenger Screening Canine Handler Course, Bridge Course, Canine Technical Operations Course, and the Office of Security Operations (OSO) Canine Management Course.¹ The information obtained from TSA Form 1904A, End of Course Level 1 Evaluation – Instructor-Led Classroom Training, which is provided to students following course completion, provides valuable feedback about the extent to which TSA personnel and State and local civilian personnel (“TSA students”) are satisfied with their learning experience, and is used to improve the course curriculum and course of instruction. Evaluating and improving the effectiveness and efficiency of instructional programs supports agency requirements, as dictated by GPRA, to improve government performance management.

- 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 students who successfully complete TSA instructor-led classroom training are asked to voluntarily complete the form to evaluate the extent to which they were satisfied or unsatisfied with their learning experience. This provides valuable feedback to TSA OTD and

¹ Because CTC is the sole DHS source for all TSA-trained canines and handlers, the TSA has partnered with local law enforcement agencies under a reimbursement agreement to train students and canines and pair the canine teams through annual evaluations. To ensure standardization of all TSA student training, the civilian students attend the same courses as TSA students. This may include pairing civilian students with an explosives-only canine in the CTC Explosives Detection Canine Handler Course; pairing civilian students with trained canines in the Passenger Screening Canine Handler Course; or enrolling students previously certified by the TSA to attend the Bridge Course to enhance their skillset. Doing so ensures all students with the TSA’s National Explosives Detection Canine Team Program receive the same course materials to successfully operate in the operational environments associated with TSA (airports, mass transit, and water vessels with the transportation triad). Lastly, CTC will be developing a course specifically for civilian supervisors and trainers that incorporates much of the content and materials in the Canine Technical Operations Course and Canine Management Course.

CTC staff. The feedback is used to improve the course curriculum and method of instruction.

CTC Training Support Unit personnel compile the collected data into quarterly assessments of the overall quality of the training environment. The information is also used at regular intervals for curriculum review and revision. The information from these forms helps CTC more effectively and efficiently meet student needs.

TSA is revising the information collection to ensure standardization of Level 1 evaluations in use at TSA. Standardization allows comparison of courses to a single, TSA-average score, as well as comparison of other courses' average scores. TSA has revised the questions and layout of the evaluation form to achieve this standardization. Also, in an effort to eliminate the potential cybersecurity and other risk(s) associated with the collection of personally identifiable information (PII), in addition to the fact that the collection of PII is not necessary, TSA has revised the collection by removing all PII informational elements from the form. As course code and location are not necessary to the collection, those elements have also been removed from the form. Lastly, TSA is revising the name of the collection, from "TSA OTWE Canine Training and Evaluation Branch End of Course Level 1 Evaluation" to "TSA End of Course Level 1 Evaluation–Instructor-Led Classroom Training."

- 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 information is collected electronically. In compliance with the Government Paperwork Elimination Act (GPEA), all TSA students, to include civilian CTC students, submit ratings and written comments electronically through a secure internal network drive accessible only by authorized personnel. See 42 USC 3504.

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

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

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

This collection does not have a significant impact on a substantial number of small businesses.

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

This information is collected from students to provide constructive feedback about their experience. Each student who successfully completes the training has the opportunity to provide as much or as little feedback as he or she deems necessary. The collection of this data enables TSA to perform an analysis to determine how well the training objectives are being met in an effort to ensure proper fulfillment of the TSA mission. This information enables TSA to update, improve, and tailor the training, curriculum, and instructor interaction for optimal education and high quality instruction. Training development personnel compile the collected data into quarterly assessments of the overall quality of the training environment. If this collection were not conducted, TSA would be limited in its ability to perform the analysis mentioned above, which relies on TSA's ability to qualitatively evaluate training effectiveness.

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

This collection will be conducted consistent with the general information guidelines.

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

TSA published a notice in the *Federal Register*, with a 60-day period for soliciting comment, see 83 FR 4502 (Jan. 31, 2018), and a 30-day notice, on May 30, 2018 (see 83 FR 24813). Consistent with the requirements of Executive Order (EO) 13771, *Reducing Regulation and Controlling Regulatory Costs*, and EO 13777, *Enforcing the Regulatory Reform Agenda*, the notices included a specific request for comments on the extent to which this request for information could be modified to reduce the burden on respondents. TSA received no comments in reply to the notices.

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

TSA does not provide any payment or gift to respondents.

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

TSA does not provide an assurance of confidentiality. However, when a student submits the completed form, the data writes to an internal, secure hard drive with an identification number completely disconnected from the individual's identity. No one will be able to connect any one form to an individual student. No Privacy Impact Assessment or System of Records Notice coverage is necessary for this information collection.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

TSA does not ask any questions of a sensitive or private nature on the End of Course Level 1 Evaluation–Instructor-Led Classroom Training form.

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

TSA estimates that on average, 79 students will participate in this collection on an annual basis. TSA estimates that it would take approximately 30 minutes (0.5 hours) to participate, resulting in an estimated average annual burden of 39.5 hours (79 students x 0.5 hours).

The cost burden is calculated by multiplying the hours by the average hourly wage rate of the participants. The national average fully loaded hourly wage for Police and Sheriff's Patrol Officers is \$48.140.²

TSA multiplies this total average annual hour burden (39.50 hours) by a fully loaded wage rate of \$48.140 to estimate an average annual hour burden cost of \$1,901.52 (39.50 hours x \$48.14 compensation rate). TSA estimates the three-year total hour burden cost of \$5,704.56 (\$1,901.52 x 3 years).

² TSA uses the average hourly wage of \$30.17 for Police and Sheriff Officers. BLS, May 2016 Occupational Employment and Wages. Police and Sheriff's Patrol Officers (33-3051). Last Modified Data: March 31, 2017. <https://www.bls.gov/oes/2016/may/oes333051.htm>. Retrieved September 22, 2017. TSA uses the compensation factor for State and local government workers. For all State and local government workers, hourly total compensation is \$48.06 and hourly wages and salaries are \$30.12. TSA estimates the compensation factor as 1.5956 (\$48.06 ÷ \$30.12). BLS, News Release, Employer Costs for Employee Compensation – June 2017. Table 4. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: state and local government workers, by occupational and industry group, June 2017. Release date September 8, 2017. https://www.bls.gov/news.release/archives/ecec_09082017.htm. Retrieved September 22, 2017. TSA estimates that the fully loaded average hourly wage rate is \$30.17000. (\$30.17 x 1.5956).

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

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

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

TSA uses the fully loaded average hourly wage rates of \$63.304³, \$74.530⁴, and \$87.402⁵, to estimate TSA employees' cost to either compile the data for management review or to review the entire accumulated package.

TSA estimates that the annual hour burden cost to the Federal Government as a result of this ICR is approximately \$36,474. This estimate, calculated using loaded hourly rates, is based on six Federal employees. Table 1 shows the total annual hour burden cost estimate for TSA.

Position and TSA Pay Band	Loaded Hourly Wage Rate (Band)	Hours for Compilation or Review	Number of Reviewers	Number of Reviews Annually	Annual Cost to Review
	A	B	C	D	E = A*B*C*D
Supervisory Agent in Charge - K	\$87.40	1.00	2	79	\$13,809.52
Supervisor - J	\$74.53	1.00	3	79	\$17,663.55
Trainer Development - I	\$63.30	1.00	1	79	\$5,001.01
Total Government Cost of Review per year					\$36,474.07

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

TSA estimates the three-year total burden to be \$109,422 (\$36,474 x 3 years).

³ The total compensation for I Band (equivalent to GS –13) TSA personnel is \$132,115 per year (including locality adjustment and other benefits). Source: Modular Cost Standards FY18, TSA Financial Management Division (MCS). $\$63.304 = \$132,115 \div 2,087$ annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. L. 99-272, 100 Stat. 82, April 7, 1986) (1985 Omnibus Budget).

⁴ The total compensation for J Band (equivalent to GS –14) TSA personnel is \$155,544 per year (including locality adjustment and other benefits). Source: MCS. $\$74.530 = \$155,544 \div 2,087$ annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: 1985 Omnibus Budget).

⁵ The total compensation for K Band (equivalent to GS –15) TSA personnel is \$182,408 per year (including locality adjustment and other benefits). Source: MCS. $\$87.402 = \$182,408 \div 2,087$ annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: 1985 Omnibus Budget).

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

The wages have been updated and revised to more accurately reflect the cost burden to the Federal Government. The number of annual reviews declined from 180 to 79. TSA removed Federal employee requests from the previously reported population as Federal employees' burden are not considered a public burden when attributed to their official duties. The previous information collection had 2 I-Band individuals compiling the data, whereas the new collection includes 1 I-Band individual compiling the data. There are now 3 J-Band supervisors and 2 K-Band supervisors reviewing the entire accumulated package.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

TSA will not publish results of this collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

TSA is not seeking such approval.

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

TSA is not seeking any exceptions to the certification statement.