

INFORMATION COLLECTION SUPPORTING STATEMENT

Transportation Security Officer (TSO) Medical Questionnaire

OMB No. 1652-0032

Exp. 7/31/2019

- 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) is requesting approval to renew this collection of information to comply with 49 U.S.C. 44935, which requires TSA to establish qualification standards for the employment of security screening personnel. With approval from the Office of Management and Budget (OMB), TSA currently collects information necessary to validate qualification standards are met through the Transportation Security Officer (TSO) medical questionnaire and further evaluation forms. See ICR Reference No. 201301-1652-006 (March 29, 2013).

TSA is revising the collection and will no longer require TSOs to provide additional information via the further evaluation forms. TSA will continue to use the medical questionnaire to determine medical and physical abilities.

- 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.**

This collection of information assists the agency in meeting its statutory obligation to ensure that no individual serves as a TSO who does not “possess basic aptitudes and physical abilities, including color perception, visual and aural acuity, physical coordination, and motor skills.” 49 U.S.C. 44935(f)(1)(B). The Security Officer Medical Questionnaire (SOMQ) enables TSA to collect the information necessary to assist health care providers in making determinations regarding candidates’ medical and physical abilities to successfully perform the job without being overly intrusive. The scope of this determination provides a candidate’s current and past medical history, including visual and aural acuity, physical coordination, and motor skills to be able to: (a) distinguish on screening equipment monitors the appropriate imaging standard; (b) distinguish each color displayed on every type of screening equipment and explain what each color signifies; (c) hear and respond to the spoken voice and to audible alarms in an active checkpoint environment; (d) perform physical searches by efficiently and thoroughly manipulating and handling baggage containers, and other objects; (e) perform pat-downs or hand-held metal detector searches of individuals with sufficient dexterity and capacity to thoroughly conduct the procedures over an individual’s entire body; and (f) demonstrate a daily fitness for duty without impairment due to illegal drugs, sleep deprivation, medication, or alcohol.

A TSA contractor facilitates receipt and processing of all medical forms.

- 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.]**

Consistent with the Government Paperwork Elimination Act, TSA has routinely considered technology to reduce the burden of this collection. As such, it has recently identified a means to collect this information electronically and is currently preparing an implementation plan to deploy an electronic version of the SOMQ in 2019. Until the electronic solution can be deployed, the collection of information from candidates under employment consideration for TSO positions will be conducted manually.

- 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.**

The SOMQ form has proven to be the most effective and appropriate method for collecting the information necessary to assist the health care providers in making determinations regarding candidates' medical and physical abilities to successfully perform the job without being overly intrusive.

During the rapid hiring of TSOs (formerly referred to as Transportation Security Screeners) in 2002 and until summer 2004, TSA used the SF-93, Report of Medical History, as the collection technique to ensure candidates under employment consideration for TSO positions met the qualification standards to successfully perform the functions of the position. With OMB approval, TSA began using the SOMQ instead of the SF-93 in 2007. See ICR Reference No. 200608-1652-003 (January 4, 2007). TSA has found the SOMQ form more suitable to collect the information necessary to assist health care providers in making determinations regarding candidates' medical and physical abilities to successfully perform the job without being overly intrusive.

- 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 does not have a significant impact on a substantial number of small businesses or other small entities. As described above, the medical questionnaire information is collected from candidates under employment consideration for TSO positions.

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.***

The determination that TSO candidates successfully meet the qualification requirements described above is essential to create and maintain a national workforce of skilled and medically qualified employees charged with protecting the Nation's transportation systems by ensuring the freedom of movement for people and commerce. The security of the Nation's transportation systems would be severely compromised if this collection is not conducted or is conducted less frequently.

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).***

There are no 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).

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 December 6, 2018 (83 FR 62879) and a 30-day notice was published on March 27, 2019 (84 FR 11552). Consistent with the requirements of Executive Order (E.O.) 13771, Reducing Regulation and Controlling Regulatory Costs, and E.O. 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 public 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 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 will maintain the information according to the Privacy Act, OPM/GOVT-10 System, Employee Medical File of Records of TSO candidates who are hired, or under the OPM/GOVT-5, Recruiting, Examining, and Placement System of Records of TSO candidates who are not hired. TSA will maintain the information in a secured area with access limited to authorized personnel who have a business need to know the information.

The collection is also covered by SORN – DHS/TSA-022, which reflects TSA’s move from its legacy payroll and personnel system to become a payroll customer of the USDA’s National Finance Center (NFC). A Privacy Impact Assessment for the HRAccess Program was published by DHS on July 28, 2009.

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.

While some of the questions TSA is posing could be considered to be of a sensitive nature, TSA deems this collection necessary to evaluate a candidate’s medical suitability for the TSO job. While some of this information is commonly considered private, the collection is essential to ensure that the individuals performing TSA’s security mission are physically able to perform their duties safely, with minimal risk of injury to themselves or others, and in a manner that does not compromise security. As noted above, TSA will follow appropriate procedures to protect this information from unauthorized disclosure.

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

TSA uses the SOMQ to collect the information necessary to assist the health care providers in making determinations regarding the medical and physical abilities of applicants for the position of TSO to successfully perform the job. The hour and cost burden calculations depend on all applicants for a TSO position completing the required SOMQ.

TSA estimates that the average annual number of respondents to this information collection process is approximately 22,500 annual responses. TSA estimates that the medical screening required to evaluate a candidate and complete the SOMQ is 45 minutes (0.75 hours), resulting in an annual hour burden of 16,875 hours. In addition, applicants to the TSO position are required to travel to a TSA-contracted medical services provider in order to receive the necessary medical screening. TSA estimates round-trip travel time to the TSA-contracted medical services provider to be 54 minutes (0.9 hours), resulting in an annual hour travel burden of 20,250 hours. The total annual hour burden of this collection is 37,125 hours (111,375 hours over three years). As TSO applicants can be any member of the public, TSA uses a fully-loaded¹ wage rate of \$36.32.² TSA estimates a total annual hour burden cost of \$1,348,380. Table 1 summarizes these calculations.

Table 1. Hour Burden and Costs for TSO Medical Questionnaire

Activity	Number of TSO Medical Screenings	Hour Burden	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$36.32
Medical Screening	22,500	0.75	16,875	\$612,900

¹ A fully loaded wage rate accounts for non-compensation costs of employment, such as health and retirement benefits.

² BLS. Employer Costs for Employee Compensation - March 2018. Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers. All Workers. Last modified June 8, 2018 (accessed September 11, 2018). https://www.bls.gov/news.release/archives/ecec_06082018.htm.

Travel to Doctor's Office		0.90	20,250	\$735,480
Total	22,500		37,125	\$1,348,380

Note: Totals may not add due to rounding.

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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 22,500 annual responses and average annual hour burden cost of \$1,348,380.

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.

Based on the data provided by TSA Office of Chief Medical Officer and CHS, TSA estimates that the total annual cost incurred by the Federal Government is \$503,074 (i.e., \$217,623 assessment by medical personnel+ \$285,451 shipping and storage).

Calculations:

The cost TSA incurs due to this information collection has two components. The first cost component is related to the assessment of the SOMQ by a team of medical personnel. TSA estimates that the assessment team of medical personnel takes 5 minutes (0.083 hours) each to review and process the SOMQ. TSA also estimates that the fully loaded average hourly wage rate for a medical professional involved in the assessment of the SOMQ is \$90. The second cost component is associated with shipping and storage costs. TSA estimates that the shipping cost of the SOMQ from the health care providers to the review location and then to a storage facility is \$9.50 per package (i.e., SOMQ shipped per candidate). In addition, the storage cost associated with the SOMQ is \$0.56 per TSO candidate.

(a) Completing (Reviewing) SOMQ

$$\text{Government cost} = 22,500 \text{ responses} \times 0.083 \text{ hours} \times \$90 = \$168,075 \text{ per year}$$

(b) Shipping of SOMQ

$$\text{Government cost} = 22,500 \text{ packages} \times \$9.50 \text{ per package} = \$213,750 \text{ per year}$$

(c) Storage of SOMQ

$$\text{Government cost} = 22,500 \text{ candidates} \times \$0.56 \text{ per candidate} = \$12,600 \text{ per year}$$

Total government cost = \$394,425 (sum of (a) to (c)).

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

TSA will no longer require TSOs to provide additional information via the further evaluation forms. However, the burden has increased due to the use of more accurate estimates regarding candidate evaluations provided by the program office. Also, due to improved efficiencies in the program office, the cost to TSA has decreased. The cost is per candidate delivery to the contractor, as both the candidate and the provider will complete and review the same form for shipment instead of separately as done in the past.

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 information collected.

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 and will display the expiration date for OMB approval of the information collection.

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 identified in Item 19, OMB Form 83-I, Certification for Paperwork Reduction Act Submissions.