

INFORMATION COLLECTION SUPPORTING STATEMENT

TSA infoBoards OMB Control Number 1652-0065

- 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. This system 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 limited to the Homeland Security Information Network (HSIN) and TSA (for TSA staff only). Through this system, TSA disseminates mission-critical information to users inside and outside of the TSA organization with a need to know.

- 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 lists. However, some groups of stakeholders use their communities (“boards”) for collaboration and to share transportation security information. With TSA infoBoards,

¹ Pub. L. 107-71 (115 Stat. 597, Nov. 19, 2001)), codified at 49 U.S.C. 114 (d).

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 (HSA) of 2002, Pub. L. 107-296 (116 Stat. 2315, Nov. 25, 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 HSA.

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 infoBoards is 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.

With TSA Form 1427, TSA infoBoards User Account Request/Renewal, TSA collects two types of information through TSA infoBoards:

1. User registration information. TSA collects 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 includes 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 collects 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.

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.

Using feedback from the infoBoards community, TSA is revising the collection instrument, TSA Form 1427. The form will now reference an additional instrument: TSA Form 1430, Computer Access Agreement (CAA) External Personnel Only. This form is intended for the public, non-Departmental and TSA infoBoards users, and certifies understanding and acceptance of applicable policy and legal requirements concerning access to network resources within DHS/TSA. The revision of TSA Form 1427 also includes correction of typographical errors, and updates to the list of TSA infoBoards names.

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) created 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 sharing transportation security information 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 to 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 June 20, 2019 (84 FR 28835) and a 30-day notice on November 4, 2019 (84 FR 59402). 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 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.**

No assurance of confidentiality has been provided to respondents; however, 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 (Nov. 27, 2012). The collection is also covered by Privacy Impact Assessments (PIAs), DHS/ALL/PIA-006 - General Contact Lists and DHS/ALL/PIA-061 - HSIN 3.0 Shared Spaces On The Sensitive But Unclassified Network, published June 15, 2007 and July 25, 2012 on www.dhs.gov, respectively.

- 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 8,000 total annual users for the TSA infoBoards predecessor system, TSA WebBoards. TSA estimates that approximately 37.5 percent (3,000) of these users are TSA employees, and thus, will not be considered users for the purposes of this Information Collection Request (ICR). The remaining 5,000 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 responses and an additional 1 hour for training associated with SSI. TSA calculates a total annual hour burden of 10,000 hours for this ICR.

The majority of industry users of are in managerial roles. TSA estimates a fully-loaded wage rate³ of \$84.96 for each respondent.⁴ TSA estimates an annual hour burden cost for this collection of \$849,643. Table 1 summarizes these estimates.

Table 1. Public Hour Burden and Costs

Activity	Annual Users	Hour Burden per User	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$84.96
Responding to TSA mission-critical information	5,000	1	5,000	\$424,822
Training		1	5,000	\$424,822
Total	5,000	2	10,000	\$849,643

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.

³ A fully-loaded wage rate accounts for non-compensation costs of employment, such as health and retirement benefits.

⁴ The unloaded wage rate for General Managers is \$55.62. Bureau of Labor Statistics. May 2018 National Industry-Specific Occupational Employment and Wage Estimates. Secorts 48 and 49 - Transportation and Warehousing. OCC 11-1021 General and Operations Managers. Last modified March 29, 2019 (accessed October 21, 2019), https://www.bls.gov/oes/current/naics2_48-49.htm#11-0000. TSA calculates a compensation factor to account for non-compensation benefits. This is the quotient of the total compensation and salary and wages component of compensation. The compensation factor is 1.52759. Bureau of Labor Statistics. Employer Costs for Employee Compensation - June 2019. Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers. Production, transportation and material moving occupations. Last modified September 17, 2019 (accessed October 21, 2019), <https://www.bls.gov/news.release/pdf/ecec.pdf>. The fully-loaded wage rate is the product of the unloaded wage rate and the compensation factor.

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 infoBoards system will be mostly funded by DHS since TSA operates 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 has employees dedicated to monitor the TSA infoBoards system on a monthly basis. TSA estimates a burden of approximately 400 hours per year for employees to monitor the infoBoards system. TSA uses an hourly compensation rate of \$79.23 for an employee multiplied by the total number of hours devoted to monitor the TSA infoBoards system.

TSA calculates an annual hour burden cost of \$31,690 for monitoring the TSA infoBoards system. Table 2 summarizes this estimate.

Table 2. TSA Hour Burden and Costs

Annual Hours	Annual Hour Burden Cost
A	B = A x \$79.23
400	\$31,690

Additionally, TSA will incur an annual maintenance cost of \$105,200 for the electronic forms. Therefore, the total Federal Government cost associated with this collection is \$136,890 (\$31,690 + \$105,200).

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

There are no changes to the information being collected. However, the cost to the Federal Government has decreased from \$2,936,226 to \$136,890 due to the reduction of start-up expenses. Also, the information collection burden has decreased due to the use of actual data, which reduced the annual respondents estimate from 6,000 to 5,000. Further, as noted in the response to question 2, TSA has added an additional instrument to TSA Form 1427. The form will now reference an additional instrument: TSA Form 1430, Computer Access Agreement (CAA) External Personnel Only. The additional form does not change the burden to the collection.

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.