

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **TSA Canine Training Center Adoption Application 1652-0067 Exp. 8/31/2020**

- 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) Canine Program is a statutorily-mandated program that operates as a partnership among TSA; aviation, mass transit, and maritime sectors; and State and local law enforcement. *See, e.g.*, section 110(e)(3) of the Aviation and Transportation Security Act (ATSA), Pub. Law 107-71 (115 Stat. 597, Nov. 19, 2001) and sections 1307 and 1602 of the Implementing Recommendations of the 9/11 Commission Act of 2007, Pub. Law 110-53 (121 Stat. 266, Aug. 3, 2007).

TSA developed the CTC to train and deploy explosive detection canine teams for TSA and for local, State, and Federal agencies in support of daily activities that protect the transportation domain. Canine teams consist of TSA employees, or local/State law enforcement officers, paired with explosives detection canines. These canine teams are trained on a variety of explosives and screening capabilities based on intelligence data and emerging threats. Canine teams are deployed after successfully undergoing a 10- or 12-week training program and seek certification after additional training within their assigned operational environment.

Of the canines purchased by TSA for purposes of the TSA Canine Program, approximately 83 percent graduate from the training program. These canines are continually assessed to ensure they demonstrate operational proficiency in their environment. The corresponding attrition rate is between 15-18 percent. Attrition arises from canines who do not graduate from the training program and those who successfully graduate, but are later assessed as not performing at operational proficiency. CTC typically repurposes 42 percent of the canines eliminated from the program to other Federal, State, and local law enforcement agencies.

Canines that attrite out of the program and not repurposed for other government purposes may be placed for adoption. TSA created the CTC Adoption Program to find suitable individuals or families to adopt the canines and to provide good homes. Individuals seeking to adopt a TSA canine must complete the CTC Adoption Application. TSA operates the Canine Training Center (CTC) Adoption Program in accordance with 41 CFR §§ 102-36.35(d) (donation of surplus property) and 102-36.365 (donation of canines used for performance of law enforcement duties).<sup>1</sup>

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<sup>1</sup> See 41 CFR § 102-36.35(d): "If a written determination is made that the property has no commercial value or the estimated cost of its continued care and handling would exceed the estimated proceeds from its sale, you may dispose of the property by abandonment or destruction, or donate it to public bodies." See also 41 CFR § 102-36.365: "... under 40 U.S.C. 555, when the canine is no longer needed for law enforcement duties, you may donate the canine to an individual who has experience handling canines in the performance of those official duties."

- 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.**

The TSA CTC Adoption Application is an online application that collects personal information from the public to determine their suitability to adopt a TSA canine. TSA uses the information collected to evaluate the individual seeking to adopt a TSA canine against program guidelines developed by CTC. The collection includes information about the individual's household, personal references, and current pet and veterinarian information. In addition, the individual must agree to transport the canine home from CTC in San Antonio, Texas, and to provide any necessary medical care for the duration of the canine's life, including heartworm and flea preventives, and annual vaccinations. TSA also collects an attestation that all information submitted is true.

- 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.]**

In compliance with the Government Paperwork Elimination Act (GPEA), TSA Canine Training Center Adoption Application information is collected electronically. The application is available at <https://www.tsa.gov/canine-adoption-program>. All applications are submitted through a secure internal network drive accessible only by authorized personnel. Applicants may also complete the form and submit via email. In addition, they may choose to mail or fax the application information.

- 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.**

Applications are voluntarily submitted by individuals interested in adopting a TSA canine. The information is not collected from any other source and would not otherwise be collected or available until an application is submitted.

- 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 the collection of information is not conducted, TSA will not be able to find suitable homes for the 58% of canines unable to be repurposed by the program. Failure to collect the information will limit TSA's ability to secure adoptive homes for TSA canines.

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 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 comments, on December 11, 2019 (See 84 FR 67752) and a 30-day notice, on March 23, 2020 (See 85 FR 16118). 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 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 any assurance of confidentiality, but information applicants submit to TSA via the web site is done so securely and only authorized personnel have access to the applicant data. This information collection is covered by a System of Records Notice provided under DHS/TSA-006 Correspondence and Matters Tracking Records. See 75 FR 18863 (April 13, 2010). The applicable Privacy Impact Assessments (PIAs) for this collection are DHS/TSA/PIA-036 Canine Website System (CWS), (January 13, 2012) and DHS/TSA/PIA-036(a) CWS (May 16, 2019).

**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 TSA CTC Adoption Application form.

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

TSA estimates that an average of approximately 300 respondents<sup>2</sup> will be completing the adoption application annually. TSA estimates that it takes approximately 10 minutes (0.16667 hours) to complete and submit the adoption application.<sup>3</sup> TSA uses the fully loaded average hourly wage rate of \$36.42 to estimate the respondents' value of time (opportunity cost).<sup>4</sup>

TSA estimates that the total annual burden to complete the adoption application is 50 hours, resulting in an annual hour burden cost of \$1,821. Table 1 shows the hour burden and cost estimation.

Table 1: Hour Burden and Cost Estimation

	Number of Respondents	Number of Responses	Time to Complete Application (hours)	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C	D = B x C	E = D x \$36.42
Completing adoption application	300	300	0.16667	50	\$1,821
<b>Total</b>	<b>300</b>	<b>300</b>		<b>50</b>	<b>\$1,821</b>

<sup>2</sup> Estimate provided by TSA CTC subject matter expert.

<sup>3</sup> Estimate provided by TSA CTC subject matter expert.

<sup>4</sup> TSA uses the mean hourly wage rate of \$24.98 for All Occupations as a proxy wage rate for the adoption applicants. BLS, May 2018 National Occupational Employment and Wage Estimates United States, All Occupations (00-0000). Last Modified: March 31, 2019.  
. Retrieved July 30, 2019.

TSA uses the compensation factor for all full-time civilian workers as a proxy for adoption applicants. For all full-time civilian workers, hourly total compensation is \$36.77 and hourly wages and salaries are \$25.22. TSA estimates the compensation factor as 1.45797 (\$36.77 ÷ \$25.22). BLS, News Release, Employer Costs for Employee Compensation - March 2019. Table 4. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers, by occupational group and full-time and part-time status, March 2019. Release date June 18, 2019.

[https://www.bls.gov/news.release/archives/ecec\\_06182019.pdf](https://www.bls.gov/news.release/archives/ecec_06182019.pdf) Retrieved July 30, 2019.

TSA estimates that the fully loaded average hourly wage rate is \$36.42 (\$24.98 × 1.45797).

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

Since TSA CTC allows respondents to submit adoption applications by web portal (email), standard U.S. mail, or fax, not all respondents bear the same cost of submitting the adoption application. TSA estimates that the cost to mail the application is \$0.55 via standard U.S. mail<sup>5</sup> and it costs \$6 to send it using long distance fax.<sup>6</sup> TSA estimates that 1.0% of applications to TSA CTC will be sent via standard mail, 1.0% by fax, and 98% via the web portal.<sup>7</sup>

TSA estimates that the adoption applicants incur a total cost of \$19.65 per year to submit their applications to TSA CTC. Table 2 shows the application submission cost.

Table 2: Application Submission Cost

	Percent of Applications	Number of Applications	Unit Cost	Annual Cost
	A	B = A x 300 Applications	C	D = B x C
Submission via U.S. mail	1.0%	3	\$0.55	\$1.65
Submission via fax	1.0%	3	\$6.00	\$18.00
Submission via web portal <sup>1</sup>	98.0%	294	\$0.00	\$0.00
<b>Total</b>	<b>100%</b>	<b>300</b>		<b>\$19.65</b>

<sup>1</sup>Applicants complete and submit the application using the web portal within 10 minutes of application and submission time captured above under hour burden.

**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 estimates it takes an average of 15 minutes (0.25 hours) to process the information provided by an adoption applicant. TSA uses the fully loaded average hourly wage rate of \$66.79,<sup>8</sup> to estimate TSA employees' cost to process the applications.

TSA estimates that TSA (or the Federal Government) incurs a total annual burden of 75 hours to process the adoption applications, resulting in an annual hour burden cost of \$5,009. Table 3 shows TSA hour burden and cost estimation.

Table 3: TSA Hour Burden and Cost Estimation

<sup>5</sup> USPS Mailing and Shipping Prices,

Retrieved July 30, 2019.

<sup>6</sup> TSA does not provide a toll-free fax line. Applicants using a fax need to use their own fax machine or a fax machine at such places as Kinko's. Based on average market prices per page, TSA estimates \$6 to submit the three-page application via fax (\$3 for the first page, \$1.50 for the 2nd page, and \$1.50 for the 3rd page).

<sup>7</sup> TSA CTC subject matter expert estimates that 1% - 3% of adoption applications would come via a combination of fax and U.S. mail, so uses an average of 2%. TSA assumes the submission rate to be the same (1.0%) via fax or U.S. mail. The remaining 98% of application submissions come via the web portal.

<sup>8</sup> The total compensation for I Band (equivalent to GS -13) TSA personnel located at TSA HQ in Arlington, VA is \$139,383.90 per year (including locality adjustment and other benefits). Source: Modular Cost Standards FY20, TSA Financial Management Division. \$66.79= \$139,383.90 ÷ 2087 annual work hours.

	Number of Applications	Time to Process Application (hours)	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$66.79
Processing adoption application	300	0.25	75	\$5,009
<b>Total</b>	<b>300</b>		<b>75</b>	<b>\$5,009</b>

**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 or adjustments in the program. However, the cost data in item 13 has been updated to show the decrease in the number of applications submitted via U.S. mail and fax, decreasing from 4.5 to 3 submissions.

**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.