INFORMATION COLLECTION SUPPORTING STATEMENT

Certified Cargo Screening Standard Security Program
OMB Control Number 1652-0053
Exp.: 7/31/2021

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) currently requires 100 percent screening of all cargo transported on passenger aircraft pursuant to a requirement in section 1602 of the Implementing Recommendations of the 9/11 Commission Act of 2007, Pub. L. 110-53 (121 Stat. 266, Aug. 3, 2007) (9/11 Act.)[1] The screening of air cargo must be in a manner approved by TSA and be commensurate with the level of security for the screening of passenger checked baggage.[2] To support implementation of this requirement, TSA created the Certified Cargo Screening Program (CCSP) through a regulation codified at 49 CFR part 1549. Under this program, TSA certifies qualified facilities as Certified Cargo Screening Facilities (CCSF) to screen air cargo.

CCSFs may screen cargo as required by TSA and must implement measures to ensure a secure chain of custody from the point of screening to the point at which the cargo is tendered to the aircraft operator. CCSFs are also required to submit certain information to TSA to determine whether a person or entity meets the standards of their security program.

In the Spring 2020, OMB approved TSA's request to revise the ICR applicable to this program to address changing conditions in the security of air cargo. Most notably, as a signatory to the Convention on International Aviation (also known as the Chicago Convention), the United States has agreed to apply the standards contained in Annex 17 as promulgated by the International Civil Aviation Organization (ICAO). Amendment 14 of Annex 17 removed the distinction between passenger and cargo operations and now requires that all cargo be subject to security controls, including screening where practicable, on all commercial air transport operations.[3] ICAO has provided until June 30, 2021, for member states to implement the above standard.

As a result of these changes, TSA expects that there will be an increase in demand for more options to mitigate the cost of screening cargo as the United States begins to build up and implement security controls to meet the June 30, 2021 deadline to implement Annex 17, Standard 4.6.1. Consistent with the need to expand screening capabilities to meet the ICAO standards that take effect in 2021, as well as a requirement in the TSA Modernization Act,[4] TSA developed a program to certify Third Party Canine-Cargo (3PK9-C) Teams to screen air cargo. TSA incorporated this capability under the framework of the CCSP, providing an opportunity for canine team providers the option to be regulated as CCSFs under 49 CFR part 1549 and

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[1] *See* 49 U.S.C. 44901(g). The requirement for screening 100 percent of the cargo transported on passenger aircraft was implemented through TSA's regulations, including amendments to parts 1515, 1520, 1540, 1544, 1546, 1548, and adding part 1549. *See* 76 FR 51848 (Aug. 18, 2011).

[2] *Id. See also* 49 U.S.C. § 44901(g)(2).

[3] *See* Convention of International Civil Aviation, Amendment 14, Annex 17, Standard 4.6.1.

[4] *See* sec. 1941 of the FAA Reauthorization Act of 2019, Division K, Title I, Pub. L. 115-254(132 Stat. 3186; Oct. 5, 2018).

approved to use certified 3PK9-C Teams to screen cargo for TSA regulated entities. As part of this program, TSA certifies qualified canine providers as Certified Cargo Screening Facilities-Canine (CCSF-K9) to screen cargo. For purposes of this document, the term "CCSF" will refer both to facility-based CCSFs and CCSF-K9s unless otherwise noted.

All CCSFs are required to allow TSA to assess whether a person or entity meets the standards of the applicable security program requirements. A CCSF-K9 is an inherently mobile capability that can screen cargo at the facility owned and operated by one of TSA's regulated entities. As holders of a TSA-approved security program issued pursuant to 49 CFR part 1549, CCSF-K9s can contract with air carriers and facility-based CCSFs to screen air cargo, on or off airport, with canine explosives detection teams certified as meeting TSA's standards. The Third Party Canine-Cargo Program (3PK9-C) program approves third-party (non-governmental) certifiers, operating under the 3PK9-C Certifier Order, to evaluate canine teams to determine whether these teams meet the TSA certification standards.

Recognizing non-governmental entities to evaluate 3PK9-C Teams to determine whether these teams meet TSA's standards for the certification of explosives detection canine teams approved to screen air cargo serves two purposes. First, it ensures effective security. TSA must have confidence that the screening conducted by certified 3PK9-C Teams will protect air cargo by identifying unauthorized explosives, incendiaries, and other destructive substances and protect the air cargo from the introduction of these destructive substances from the time the cargo is screened until it is accepted by an aircraft operator or a foreign air carrier for transport.

To provide this confidence, TSA established uniform processes and standards for approval of 3PK9-C Certifiers, including qualification of personnel who will evaluate canine teams and consistent application of TSA's criteria for canine teams seeking certification or recertification as a certified 3PK9-C Team. Second, the use of third-party certifiers allows for market-driven expansion of the program. As required by section 1941 of the TSA Modernization Act, no federal funds can be expended for the training or certification of canine teams operating under this program. As with the CCSF-K9s, qualified persons may apply to become a 3PK9-C Certifier. If approved, the 3PK9-C Certifier agrees to comply with an Order issued by TSA under the authority of 49 U.S.C. 46105.

TSA's three primary security programs issued under 49 CFR part 1549 provide standards for compliance for those entities subject to the program requirements: (1) the Certified Cargo Screening Security Program (CCSSP), applicable to facility-based CCSFs; (2) the Certified Cargo Security Program-Canine (CCSP-K9), applicable to CCSF-K9s; and (3) the 3PK9-C Certifier Order, applicable to certified 3PK9-C Teams.

This ICR addresses the collections of information under the full scope of the CCSP, as discussed above. *See* OMB number 1652-0053. The collection of information is specifically required to address the following requirements of the CCSP: CCSF applications, 3PK9 certifier applications, Security Threat Assessment (STA) applications, criminal history records check, recordkeeping information, security program information, 3PK9-C Certifier Order information, significant security concerns information, and security coordinator information. Each of these will be discussed further in response to Question 2.

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.*

(1a) **CCSF Applications**. A CCSF applicant is required to submit an application to become a CCSF at least 90 days before the intended date of operation. In addition, once certified as a CCSF, the CCSF is required to submit any changes to the application information as they occur. CCSFs must renew their certification every 36 months by submitting a new complete application. CCSF applicants are required to provide TSA access to their records, equipment, and facilities necessary for TSA to conduct an eligibility assessment. *See* 49 CFR 1549.7. A CCSF-K9 applicant must also submit an Operational Implementation Plan, described within the CCSP-K9 and any changes to the plan information as they occur.

(1b) **3PK9-C Certifier Applications**. TSA requires submission of initial applications, and updates to information in an application, by any person interested in being a 3PK9-C Certifier under the 3PK9-C Certifier Order.

(2a) **STA Applications**. TSA regulations require CCSF applicants to ensure that individuals performing cargo screening and related functions, and their supervisors have completed an STA conducted by TSA. In addition, TSA regulations require CCSF Security Coordinators (SC) and their alternates to successfully have completed an STA. TSA regulations further require these individuals to submit personally identifiable information so that TSA can perform STAs. *See* TSA Form 419F, previously approved under OMB control number 1652-0040. *See also* 49 CFR 1549.103 and 1549.111.

(2b) **Criminal History Records Check (CHRC)**. TSA requires 3PK9-C Certifiers, 3PK9-C Canine teams, employees and authorized representatives, and those authorized to conduct 3PK9-C Program activities with unescorted access to a Security Identification Display Area, screening of air cargo, or carrying of explosives in the air cargo environment, to provide personally identifiable information including fingerprints so that they can undergo a CHRC.

(3) **Recordkeeping**. TSA requires CCSFs and 3PK9-C Certifiers to maintain records of compliance associated with compliance with all statutes, regulation, directives, orders, security programs, CHRCs, STAs, training, and other recordkeeping requirements.

(4a) **CCSF-Required Security Programs**. TSA requires CCSFs to accept and operate under a standard security program provided by TSA, accept TSA-initiated amendments, or submit a proposed modified security program or amendment(s) to the designated TSA official for approval initially and periodically thereafter as required.

(4b) **The 3PK9-C Certifier Order**. The 3PK9-C Certifier Order is provided to persons who apply to TSA to become a 3PK9-C Certifier and agree to implement TSA's requirements, subject to enforcement for non-compliance. TSA requires 3PK9-C Certifiers to fully implement the requirements in the Order, any TSA-initiated amendments, and to follow specified procedures when submitting requests for modifications to the designated TSA official for approval initially and periodically thereafter, as applicable.

(5) **Significant Security Concerns Information**. TSA requires CCSFs and 3PK9-C Certifiers to report to TSA incidents, suspicious activities, and/or threat information.

(6) **Security Coordinator**. TSA requires CCSFs and 3PK9-C Certifiers to provide the name and contact information of the SC and one or more designated alternates at the corporate or ownership level.

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.*

CCSF and 3PK9-C Certifier applicants have the latitude and flexibility to maintain the required information in a manner that best meets their particular needs, including maintaining the information electronically. CCSF and 3PK9-C Certifier applicants submit applications and related information required under the TSA regulations electronically through email. TSA also accepts paper applications by mail. TSA has systems in place to serve as repositories of information on participating CCSFs and 3PK9-C Certifiers to support the application process, including the STA application and review processes. Individuals submit personally identifiable information required for TSA to conduct STAs via a web-based tool. For those respondents without the resources or desire to submit information electronically, TSA will continue to work with entities to ensure methods are in place to submit and/or maintain the required information in a manner that best meets their needs.

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.*

In lieu of an STA application, TSA may accept the following: a current Hazardous Materials Endorsement identified in 49 CFR part 1572 evidenced by a State-issued commercial driver's license with hazardous materials endorsement; a current Transportation Worker Identification Credential (TWIC®); a current Free and Secure Trade (FAST) card issued by the U.S. Customs and Border Protection under the FAST program; a criminal history records check that included a name-based check; or, another STA determined by TSA to be comparable to the STA specified in the regulations. In addition, TSA may also accept the following from 3PK9-C Certifier applicants: a current enrollment in one of the following DHS Trusted Traveler Programs: TSA PreCheck®, Global Entry, NEXUS, or Sentri.

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 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.***

The CCSFs and 3PK9-C Certifiers provide a process through specified programs for the air cargo industry to meet the congressionally mandated requirement to screen 100 percent of all air cargo. TSA must create programs to ensure methods of screening 100 percent of air cargo remain in place. If this information collection is not conducted, the air cargo industry may not be able to screen 100 percent of cargo transported on aircrafts without significant delays, which may have a negative effect on commerce.

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).***

With the exception of the following, this collection is conducted in accordance with 5 CFR 1320.5(d)(2).

- Information may need to be submitted more than once as CCSFs and 3PK9-C Certifiers are required to submit any changes to their initial application as they occur, which may be more frequently than quarterly.

- Under TSA regulations, for individuals required to undergo an STA (for example, an individual authorized to perform screening functions), TSA notifies the individual's employer in writing that it has served a Determination of No Security Threat, a Final Determination of Threat Assessment, or a Withdrawal of Final Determination of Threat Assessment, as applicable, to the individual. In the interest of transportation security, the employers are required to retain this notification for 180 days after the employee has separated from the company.

- CCSF-K9 providers and certified 3PK9-C Teams are required to complete certification and recertification events in order to manage and become certified cargo screening canine teams under TSA regulations. All records are retained for 180 days after the individual is no longer a participant of the 3PK9-C Certifier Order and the 3K9-C Program.

- For purposes of TSA's determination of whether the CCSF or 3PK9-C Certifier has complied with TSA's requirements, the following records must also be retained for 180 days after the individual is no longer employed by the CCSF or the 3PK9-C Certifier or is no longer acting as the CCSF's authorized representative:

  (1) Records of all training and instruction given to each individual under the security requirements of 49 CFR part 1549, subpart B.

  (2) Records demonstrating that each individual has complied with the STA provisions of 49 CFR 1549.111.

  The following records must be retained until the next re-certification or until instructed by TSA to retain the records for a longer period, which may be longer than three years:

(1) Copies of all applications for approval or renewal of approval by TSA to operate as a CCSF under 49 CFR part 1549.

(2) Copies of TSA's approval and renewals of approval as required by 49 CFR part 1549.

(3) Copies of Certification Events for the initial and renewal process.

(4) Copies of records for audits.

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.***

TSA published a 60-day notice in the *Federal Register* on November 18, 2020 (85 FR 73502), and published a 30-day notice on May 14, 2021 (86 FR 26229). No comments were received from either notice.

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.***

While there are no assurances of confidentiality, information provided by individuals will be protected from disclosure to the extent appropriate under the applicable provisions of the Freedom of Information Act and the Privacy Act of 1974. Personal data will be collected and maintained in accordance with the Privacy Act. A Privacy Impact Assessment (PIA) update of DHS/TSA/PIA-019 Air Cargo Security Program is being completed to include the new population of screeners (canine and canine certifiers). PIA coverage is also provided by DHS/TSA/PIA-020 Security Threat Assessment for Airport Badge and Credential Holders. The applicable TSA system of records notice is DHS/TSA-002, Transportation Security Threat Assessment System, last published in the *Federal Register* on August 11, 2014 (79 FR 46862).

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 will not ask any questions of a sensitive or private nature.

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

In the following, TSA describes the expanded respondent population and presents a summary of each of the information collections covered by this ICR. For the purpose of providing burden

estimates in this section, "CCSF" refers to the facility-based entities under the CCSSSP and "CCSF-K9" refers to canine providers under the CCSP-K9.

APPLICATIONS

CCSF Applications

Applicants seeking certification to be a cargo screening facility under 49 CFR part 1549 send TSA an application for consideration. TSA estimates an average annual number of CCSF applications to be 60. TSA estimates that each CCSF application requires three (3) hours to complete, resulting in an annual hour burden of 180 hours. TSA assumes CCSF applications are completed by a first-line supervisor with a fully-loaded[5] hourly wage rate of $45.18[6], for an annual hour burden cost of $8,132. Table 1 summarizes these estimates.

Table 1. Hour Burden and Costs for CCSF Applications

Annual Number of Applications	Hour Burden per Application	Total Annual Hour Burden	Annual Hour Burden Cost
A	B	C = A x B	D = C x $45.18
60	3	180	$8,132

Note: Calculations may not be exact due to rounding.

CCSF-K9 Applications

As with CCSFs, CCSF-K9 applicants seeking certification to screen cargo send TSA an application for consideration. TSA estimates that three canine providers will apply annually to become CCSF-K9s.[7] TSA estimates that a CCSF-K9 application will take three hours to complete, resulting in an average annual hour burden of nine hours. TSA assumes these

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[5] A fully-loaded wage rate includes non-salary costs of employer cost of employee compensation, such as health and retirement benefits.

[6] The unloaded wage rate for an Aircraft Cargo Handling Supervisor is $29.86. Bureau of Labor Statistics (BLS). May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-1011 Aircraft Cargo Handling Supervisors. Last modified March 30, 2018 (accessed August 1, 2018), https://www.bls.gov/oes/2017/May/naics3_481000.htm. TSA calculates a load factor to increase the unloaded wage to account for non-wage compensation. TSA calculates this factor by dividing the total compensation ($28.40) by the wage and salary component ($18.77) of compensation to get a load factor of 1.51305. BLS. Employer Costs for Employee Compensation - March 2018. 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 June 8, 2018 (accessed August 1, 2018), https://www.bls.gov/news.release/archives/ecec_06082018.htm. The fully-loaded wage rate is calculated by multiplying the unloaded wage rate by the load factor: $45.1798 = $29.86 x 1.51305.

[7] Although three respondents do not trigger the PRA threshold of "10 or more persons" TSA is including estimates within this ICR in the event more applications are received on an annual basis.

applications are completed by a first-line supervisor with a fully loaded wage rate of $73.37,[8] for a total annual hour cost burden of $660. Table 2 summarizes these estimates.

<u>3PK9-C Certifier Application</u>

Applicants seeking certification to become a 3PK9-C Certifier must send TSA an application for consideration. TSA estimates an annual average of 5.33 applications to be submitted.[9] TSA estimates that each 3PK9-C Certifier Application will take eight (8) hours to complete, resulting in an average annual hour burden of 42.67 hours. TSA assumes the applications are completed by an SC with a fully-loaded hourly wage rate of $73.37, which translates into a total annual hour cost burden of $3,130. Table 2 summarizes these estimates.

Table 2. Hour Burden and Costs for CCSF-K9 & 3PK9-C Certifier Applications

	Number of Applications (A)	Hour Burden per Application (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x $73.37)
CCSF-K9 Applications Annual Average	3.00	3.00	9	$660
3PK9-C Certifier Annual Average	5.33	8.00	42.67	$3,130

Note: Calculations may not be exact due to rounding.

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[8] Market data for CCSF-K9 frontline supervisors is not readily available. As such, TSA made the following assumptions to calculate a proxy: the frontline supervisor would be equivalent to a TSA I-Band Supervisory Transportation Security Specialist (Canine). TSA assumes this frontline supervisor will work near a Cat X airport, which comprise of domestic airports with the greatest passenger volume. As such, TSA adjusts the base pay of this I-Band employee for Cat X airport locality by 24.33 percent. The annual base salary adjusted for locality pay, 24.33 percent, for the I-Band employee is $101,278.70. TSA divides this annual salary by the number of workable hours for a Federal employee (2,087) in a calendar year to get an hourly wage rate of $48.53. Finally, TSA multiplies this wage rate by the compensation factor of 1.512 to obtain the fully-loaded wage rate ($73.37 = $48.53 x 1.512). Note that this compensation factor corresponds to the average load factor for a civilian employee working in Production, Transportation, and Material Moving, over the December 2017, March 2018, June 2018, and September 2018 quarters. BLS. Employer Costs for Employee Compensation - 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 December 14, 2018 (accessed February 05, 2019), Employer Costs for Employee Compensation Archived News Releases: U.S. Bureau of Labor Statistics, https://www.bls.gov/bls/news-release/ecec.htm.

[9] TSA estimates it will receive 14 (fourteen) 3PK9-C Certifier applications in Year 1. In Years 2 and 3, TSA estimates it will receive one application, per annum.

SECURITY THREAT ASSESSMENTS (STA) APPLICATIONS

CCSFs STA Applications

Certain employees of CCSFs are required to undergo a STA by TSA. TSA estimates there will be 5,785 STA applications per year. TSA estimates it takes each employee approximately 15 minutes (0.25 hours) to complete an application, for an annual hour burden of 1,466 hours. TSA uses a weighted-average fully-loaded[10] hourly wage rate of $29.98.[11] TSA calculates a total annual hour cost burden of $43,354. Table 3 summarizes these estimates.

Table 3. Hour Burden and Costs for CCSF STA Applications

Annual Number of Applications	Hour Burden per Application	Total Annual Hour Burden	Annual Hour Burden Cost
A	B	C = A x B	D = C x $29.98
5,785	0.25	1,446	$43,354

Note: Calculations may not be exact due to rounding.

CCSF-K9 STA Applications

Certain employees of CCSF-K9s are required to undergo an STA either conducted or approved by TSA, including a criminal history records check. The CCSF-K9 must demonstrate compliance with the requirement that their covered employees must undergo a criminal history records check. TSA has permitted these covered employees to meet the requirement by applying and receiving an STA through any of the following: (1) TSA PreCheck®; (2) an Airport Security Program (ASP) held by an airport, regulated under 49 CFR part 1542, with a Secure Identification Display Area badge and corresponding STA including CHRC; or (3) an Aircraft Operator Standard Security Program held by an aircraft operator, regulated under 49 CFR part 1544, that requires administration of a CHRC. Data collection burden such as application time and travel burdens would be part of the following TSA existing Information Collection Requests: TSA PreCheck® Application Program (OMB Control No. 1652-0059), Airport Security Part 1542 (OMB Control No. 1652-0002), Aircraft Operator Security 49 CFR Part 1544 (OMB Control No. 1652-0003).

While the STA application creates a corresponding information collection burden, the CCSP-K9 will need to submit information to TSA to validate their STA, the expiration of their STA and track the employees of a CCSF-K9 if their STA is revoked. TSA estimates CCSF-K9 managers will spend 15 minutes (0.25 hours) per employee providing the necessary information to TSA as well updating information on occasion. TSA estimates there will be an average of 240 STAs for

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[10] *Supra.*

[11] This is a weighted average (by employment) of a fully-loaded wage rate among Laborers and Freight, Stock, and Material Movers, and Air Cargo Handling Supervisors. As calculated above, the fully-loaded wage rate for Supervisors is $45.18 (employment of 3,240). The fully-loaded wage rate for Laborers is $25.84. The unloaded wage rate for Laborers is $18.86 (employment of 34,190). BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-7062 Laborers and Freight, Stock, and Material Movers, Hand. Last modified March 30, 2018 (accessed August 1, 2018), https://www.bls.gov/oes/2017/May/naics3_481000.htm. As above, TSA calculates a fully-loaded wage rate by multiplying a compensation factor with the unloaded wage rate ($28.54 = $18.86 x 1.51305, see *Supra*). The fully-loaded wage rates are weighted by employment to calculate a fully-loaded weighted average hourly wage rate: $29.9769 = [($28.54 x 34,190) + ($45.18 x 3,240)] ÷ (34,190 + 3,240).

CCSF-K9's and 60 hours annually multiplied by a first-line supervisor wage rate of $73.37, for an annual cost of $4,402. Table 4 summarizes these estimates.

3PK9-C Certifier STA Applications

Certain employees of a 3PK9-C Certifier are required to undergo a STA. TSA estimates there will be an average of 58 STA submissions per year, and will take 15 minutes to submit (0.25 hours) for a time burden of 15 minutes (0.25 hours) for each STA. In total, the annual hour burden is 14.5 hours. TSA uses a fully-loaded hourly wage rate of $73.37, which translates to a total annual hour cost burden of $1,063.86.[12] Table 4 summarizes these estimates.

Table 4. Hour Burden and Costs for CCSF-K9 and 3PK9-C Certifier STA Applications

Annual Average	Number of Applications (A)	Hour Burden per Application (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x $73.37)
CCSF-K9 Provider	240	0.25	60.0	$4,402
3PK9-C Certifier	58	0.25	14.5	$1,063.86

Note: Calculations may not be exact due to rounding.

RECORDKEEPING

CCSFs Recordkeeping

For each employee required to perform air cargo screening, CCSFs must also maintain records for training, TSA-required internal audits, TSA audits and STA per the requirements of the CCSSSP. TSA estimates an average annual number of respondents to be 784 companies. TSA uses a fully-loaded hourly wage rate of averaged for CCSF employees $23.00[13] for Information Clerks.

TSA estimates an annual average number of responses for training records to be 5,784. TSA estimates each response will require a time burden of .03 hours, for an annual hour burden of 174 hours and an annual hour burden cost of $3,991.

TSA estimates an annual average number of responses for internal audits to be 935. TSA will require the respondents to conduct an internal audit and show proof of compliance. TSA estimates each response will require a time burden of three hours, for an annual hour burden of 2,805 hours and an annual hour burden cost of $64,515.

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[12] Unlike the CCSF entities, TSA subject matter experts (SMEs) do not assume that there is an administrative assistant to conduct this record-keeping activity, therefore uses the managerial wage.

[13] The unloaded wage rate for Receptionists and Information Clerks is $15.20. BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 43-4141 Receptionists and Information Clerks. Last modified March 30, 2018 (accessed August 1, 2018), https://www.bls.gov/oes/2017/May/naics3_481000.htm. BLS. Employer Costs for Employee Compensation - March 2018. 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 June 8, 2018 (accessed August 1, 2018), https://www.bls.gov/news.release/archives/ecec_06082018.htm. The fully-loaded wage rate is calculated by multiplying the unloaded wage rate by the load factor: $22.99836 = $15.20 x 1.51305.

TSA estimates an annual average number of responses for TSA audits to be 2,992. TSA estimates each response will require a time burden of one hour, for an annual hour burden of 2,992 hours and an annual hour burden cost of $68,816.

TSA estimates an annual average number of responses for STA records to be 784. TSA estimates each response will require a time burden of 0.18 hours, for an annual hour burden of 141 hours and an annual hour burden cost of $3,245.76.

TSA estimates an average overall annual hour burden of 6,111.64 hours for all recordkeeping requirements. TSA estimates an annual average hour cost burden to overall CCSFs at $140,568. Table 5.A. summarizes these estimates.

Table 5.A. Hour Burden and Costs for Recordkeeping for CCSFs

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x $23.00
Training	5,784	.03	174	$3,991.00
Internal Audits	935	3.00	2,805	$64,515.00
TSA Audits	2,992	1.00	2,992	$68,816.00
STA Records	784	.18	141	$3245.76
Total	**10,495**		**6,111.64**	**$140,567.76**

CCSF-K9 Recordkeeping

For each employee required to perform air cargo screening, CCSF-K9s must also maintain records for certification events, training, internal audits, TSA audits and STAs per the requirements of the CCSP-K9.   TSA estimates an average annual number of respondents to be seven companies. TSA uses a fully-loaded hourly wage rate of $38.00 overall average employee cost for information submission.

TSA estimates an annual average number of responses for certification events to be 288. TSA estimates each response will require a time burden of .38 hours, for an annual hour burden of 109.44 hours and an annual hour burden cost of $4,159.

TSA estimates an annual average number of responses for training records to be 693. TSA estimates each response will require a time burden of .03 hours, for an annual hour burden of 20.79 hours and an annual hour burden cost of $790.

TSA estimates an annual average number of responses for internal audits to be 1,180. TSA will require the respondents to conduct an internal audit and show proof of compliance. TSA estimates each response will require a time burden of .161 hours, for an annual hour burden of 188.8 hours and an annual hour burden cost of $7,174.

TSA estimates an annual average number of responses for TSA audits to be 2,992. TSA estimates each response will require a time burden of .887 hours, for an annual hour burden of 2653.90 hours and an annual hour burden cost of $100,848.40.

TSA estimates an annual average number of responses for STA records to be 240. TSA estimates each response will require a time burden of 0.18 hours, for an annual hour burden of 43.2 hours and an annual hour burden cost of $1,641.60.

TSA estimates an average overall annual hour burden of 3,016.13 hours for all recordkeeping requirements. TSA estimates an annual average hour cost burden to overall CCSF-K9s at $114,613.10. Table 5.B. summarizes these estimates.

Table 5.B. Hour Burden and Costs for Recordkeeping for CCSF-K9s

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x $38.
Certification Events	288	.38	109.44	$4,159.00
Training	693	.03	20.79	$790.00
Internal Audits	1,180	.16	188.8	$7,174.00
TSA Audits	2,992	.887	2,653.904	$100,848.40
STA Records	240	.18	43.2	$1,641.60
Total	**5,393**		**3,016.134**	**$114,613.00**

Note: Calculations may not be exact due to rounding.

3PK9-C Certifier Recordkeeping

For each employee required to undergo an STA, 3PK9-C Certifier employees must maintain, certification events, audits, training, STA records and other recordkeeping requirements of the 3PK9-C Certifier Order. TSA estimates the average annual number of respondents to be 12 per year. TSA uses a fully-loaded hourly wage rate of $73.37 overall average employee cost for information submission.[14]

TSA estimates an annual average number of responses for certification events to be 638. TSA estimates each response will require a time burden of .129 hours, for an annual hour burden of 82.302 hours and an annual hour burden cost of $6,038.50.

TSA estimates an annual average number of responses for training records to be 63. TSA estimates each response will require a time burden of .03 hours, for an annual hour burden of 1.89 hours and an annual hour burden cost of $138.66.

TSA estimates an annual average number of responses for internal audits to be 12. TSA will require the respondents to conduct an internal audit and show proof of compliance. TSA estimates each response will require a time burden of .175 hours, for an annual hour burden of 2.1 hours and an annual hour burden cost of $154.08.

TSA estimates an annual average number of responses for TSA audits to be 12. TSA estimates each response will require a time burden of .43 hours, for an annual hour burden of 5.16 hours and an annual hour burden cost of $378.59.

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[14] Unlike the CCSF entities, TSA SMEs do not assume that there is an administrative assistant to conduct this record-keeping activity, therefore uses the managerial wage.

TSA estimates an annual average number of responses for STA records to be 58. TSA estimates each response will require a time burden of 0.18 hours, for an annual hour burden of 10.44 hours and an annual hour burden cost of $765.98.

TSA estimates an average overall annual hour burden of 101.89 hours for all recordkeeping requirements. TSA estimates an annual average hour cost burden to overall CCSF-K9s at $7,475.82. Table 5.C. summarizes these estimates.

Table 5.C. Hour Burden and Costs for 3PK9-C Certifier Recordkeeping

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	**B**	**C = A x B**	**D = C x $73.37**
Certification Event	638	.129	82.302	$6,038.50
Training	63	.03	1.89	$138.66
Internal Audits	12	.175	2.1	$154.08
TSA Audits	12	.43	5.16	$378.59
STA Records	58	.18	10.44	$765.98
Total	**783**		**101.89**	**$7,475.82**

SECURITY PROGRAMS/ CERTIFIER ORDER

CCSSP

TSA also has a number of burdens associated with the collection of information regarding a CCSSP. Under TSA's regulations, upon successful completion of an application to become a CCSF, TSA issues a security program to the CCSP and, following an assessment, certifies the CCSF. This process must be repeated every three years. For each of these burdens, TSA assumes the full-loaded hourly wage rate of $45.18 for first-line supervisors.

As discussed in the CCSF Application section, TSA estimates that 60 entities will apply for certification approval every year. TSA estimates a burden of 40 hours per new certification, to become a CCSF, resulting in an annual hour burden of 2,400 hours and an annual hour burden cost of $108,431.

Additionally, existing CCSFs must undergo recertification under the CCSSSP every three years. TSA estimates an annual average number of re-certifications to be 475. TSA estimates each re-certification to require a 3-hour time burden, for an annual hour burden of 1,425 hours and an annual hour burden cost of $64,381.

Under TSA's regulations, CCSF's may request amendments to their CCSSP. TSA estimates it will receive one amendment request per year. TSA estimates each requested amendment will place a 1-hour burden on a CCSF, for an average annual hour burden of one hour and an average burden cost of $45. If safety and the public interest require an amendment, TSA may amend The CCSSSP.

TSA's regulations also permit TSA to amend the CCSSP. TSA estimates it will issue 10 amendments per year with which CCSF respondents must comply. Each amendment will take

40 hours to implement, for an annual average burden hours of 400 burden hours and an annual hour burden cost of $18,072.

CCSFs must designate and submit the name and contact information of a SC and alternate. TSA estimates there will be 60 submissions which will take 30 minutes (0.50 hours) to submit. TSA estimates the annual hour of 30 hours a year and annual cost of $1,355.

CCSFs must report security incidents to TSA. TSA estimates it will get 15 incidents reported a year, at a 20 minutes (0.3333 hrs.) per report. TSA estimates five hours annually and an annual cost of $226.

Across all CCSSP-related collections, TSA estimates an annual hour burden of 4,261 and an annual average hour burden cost of $192,510. Table 6 summarizes these estimates.

Table 6. Hour Burden and Costs for CCSF Security Programs

Activity	Number of Annual Responses	Hour Burden per Response	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B	C = A x B	D = C x $45.18
New Certification	60	40	2,400	$108,431
Recertification	475	3	1,425	$64,381
Program Amendment	1	1	1	$45
TSA Issued Amendments	10	40	400	$18,072
Security Coordinator Submissions	60	0.5	30	$1,355
Security Incident Reports	15	0.3333	5	$226
Total	**621**		**4,261**	**$192,510**

Note: Calculations may not be exact due to rounding.

CCSP-K9

TSA also has a number of burdens associated with the collection of information regarding a CCSP-K9. For each of these burdens, TSA assumes the fully-loaded hourly wage rate of $73.37 for security coordinators, with a first-line supervisor wage rate. As discussed in the CCSF-K9 Application section, TSA estimates that three entities will apply for certification approval every year. TSA estimates a burden of 40 hours for a CCSF-K9 to implement the security program, resulting in an average annual hour burden of 120 hours and a total annual hour burden cost of $8,804.

Similar to CCSFs, CCSF-K9s may submit amendments to their security program. TSA estimates it will process 10 amendments per year. Each amendment issued by a CCSF-K9 will take one hour to submit, for an annual average hour burden of 10 hours and an annual hour burden cost of $734.

TSA's regulations permit TSA to amend the CCSP-K9. TSA estimates it will impose 10 amendments per year with which CCSF-K9 respondents must comply. Each amendment will take 40 hours to implement, for an annual average burden hours of 400 burden hours and an annual hour burden cost of $29,348.

The CCSP-K9 mandates that each CCSF-K9 must designate and submit the name and contact information of a SC and alternate. TSA estimates three new CCSF-K9 will submit the required information and it will take 30 minutes (0.5 hrs.) to submit. TSA estimates the annual hour of two hours a year and annual cost of $110.

Lastly, CCSF-K9s must report security incidents to TSA. TSA estimates it will receive 15 incidents reported a year, with a time burden of 20 minutes (0.3333 hours) per report. TSA estimates a total annual hour burden of five hours and a total annual cost burden of $367.

Across all CCSP-K9 related collections, TSA estimates an annual hour burden of 536.49 and an annual average hour burden cost of $39,362.97. Table 7 summarizes these estimates.

Table 7. CCSF-K9 Security Program Hour Burdens and Costs

Activity	Number of Annual Responses (A)	Hour Burden Per Response (B)	Total Annual Hour Burden (C = A x B)	Total Annual Hour Burden Cost (D = C x $73.37)
New Certifications	3.00	40.00	120	$8,804
Submitting Amendments of Security Program to TSA	10.00	1.00	10	$734
TSA Issued Amendments	10.00	40.00	400	$29,348
Security Coordinator Submissions	3.00	0.5	2	$110
Security Incident Reports	15.00	0.3333	5	$367
Annual Average	**41.00**		**536.49**	**$39,362.97**

Note: Calculations may not be exact due to rounding.

3PK9-C Certifier Order

There are a number of burdens associated with the collection of information for the 3PK9-C Certifiers Order, including application, 3PK9-C Certifier amendments, TSA issued amendments, designation of an SC, and reporting of security incidents, certification, security coordinator, security incidents. For each of these quantified information collection burdens, TSA assumes they are completed by a front-line supervisor (security coordinator) with a fully-loaded wage of $73.37.

As discussed in the 3PK9-C Certifiers Application section, TSA estimates that 5.33 (16 divided by three years) entities will apply for certification approval every year. TSA estimates a burden of 40 hours for each new 3PK9-C Certifier's Order. This translates to an annual average of 213.2 hours, and an average annual cost burden of $15,642.48.

Similar to CCSF-K9s, 3PK9-C Certifiers may submit amendments to their security program. TSA estimates it will process one amendment per year. Each amendment issued by a 3PK9-C Certifier will take one hour to submit, for an annual average hour burden of one hour and an annual hour burden cost of $73.37.

TSA may also amend the 3PK9-C Certifier's Order. TSA estimates it will impose one amendment per year with which 3PK9-C Certifier's respondents must comply. Each amendment

will take 40 hours to implement for an annual average burden hours of 40 burden hours and an annual hour burden cost of $2934.80.

Similar to CCSFs and CCSF-K9s, each 3PK9-C Certifier must designate and submit the name and contact information of a SC and alternate. TSA estimates each of the 15 3PK-9 Certifier will submit the required information and it will take 30 minutes to submit. TSA estimates the annual hour burden is 2.67 hours a year and annual cost of $196.

The 3PK9 -Certifiers must report security incidents to TSA. TSA estimates it will receive 15 incidents reported a year, with a time burden of 20 minutes (0.33 hours) per report. TSA estimates a total annual hour burden of five hours and a total annual cost burden of $367.

Across all 3PK9-C Certifier Order-related collections, TSA estimates an annual hour burden of 261.87 and an annual average hour burden cost of $19,213.65. Table 8 summarizes these estimates.

Table 8. Hour Burden and Costs for 3PK9-C Certifier Order

Activity	Number of Annual Responses (A)	Hour Burden Per Response (B)	Total Annual Hour Burden (C = A x B)	Hour Burden Cost (D = C x $73.37)
New Certifications	5.33	40.00	213.20	$15,642.48
Security Coordinator Submissions	5.33	0.50	2.67	$196
3PK9-C Certifier Amendments	1	1	1	$73.37
TSA Issued Amendments	1	40	40	$2934.80
Security Incident Reports	15.00	0.333	5.00	$367
Annual Average	**27.66**		**261.87**	**$19,213.65**

Note: Calculations may not be exact due to rounding.

Total for CCSF, CCSF-K9, and 3PK9-C Certifier Respondents

TSA estimates the annual respondents for CCSF, CCSP-K9, and 3PK9-C Certifier to be 2,527, the total annual hour burden to be 16,040.99 hours, and the corresponding annual hour burden cost of $574,485.40 for this information collection. Table 9 summarizes these estimates.

Table 9. Total Annual Respondents, Hour Burden and Costs for CCSFs, CCSF-K9 and 3PK9-C

Activity	Respondents	Responses	Annual Hour Burden	Annual Hour Burden Cost
Applications				
CCSF	60	60	180	$8,132
CCSF-K9	30	3	9	$660
3PK9-C	16	5.33	42.67	$3,130
STA Applications				
CCSF	784	5785	1446	$43,354
CCSF-K9	7	240	60	$4,402

3PK9-C	16	58	14.5	$1,063.86
Recordkeeping				
CCSFs	784	10,495	6,111.64	$140,568.00
CCSF-K9	7	5,393	3,016.13	$114,613.10
3PK9-C	16	783	101.69	$7,475.82
Security Programs / Orders				
CCSF	784	621	4,261	$192,510
CCSF-K9	7	41	536.49	$39,362.97
3PK9-C	16	27.66	261.87	$19,213.65
Total	**2,527**	**23,511.99**	**16,040.99**	**$574,485.40**

Note: Calculations may not be exact due to rounding.

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

<u>STA Fees</u>

As described in Question 12, TSA estimates that employees from three populations – CCSF, CCSF-K9, and 3PK9-C Certifiers– will complete a STA for purposes of complying with the CCSSSP, CCSP-K9, and the 3PK9-C Certifier Order. TSA will permit CCSF-K9 employees and 3PK9-C Certifier employees to meet the STA with CHRC requirements found in the CCSP-K9 and 3PK9-C Certifiers Order, via other TSA vetting requirements and pay corresponding costs for those other STAs because other STAs contain a CHRC, to include a fingerprint based check.

TSA estimates a fee of $41.00 for each STA. TSA assumes that it will process an average of 5,785 STAs a year from the CCSF population, which translates to a cost of $237,185 collected annually. Table 10 summarizes the costs.

Table 10. STA Fee Costs for CCSF Populations

Population	Annual Number of STAs	STA Fee	STA Fee Costs
	A	B	C = A x B
CCSF STAs	5,785	$41.00	$237,185

Note: Calculations may not be exact due to rounding.

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 will not have been incurred without this collection of information.***

<u>TSA Costs for Facility-Based CCSF Applications, Recertification, Security Coordinators, and Incident Reporting</u>

TSA estimated an annual average of 535 (475 updated programs + 60 new programs) applications and security program reviews. CCSF applications and security program reviews are estimated to take an average 10 hours per entity requesting certification at a cost of $72.72 per hour for a TSA employee. The wage is based on the average loaded hourly wage rate for an I/J band TSA employee. TSA estimated that collecting security coordinator information and responding to security incident would involve 30 minutes (0.5 hours) and 10 hours, respectively.

TSA hours for these responses would be 5,530 annually and cost $402,125. Table 11 summarizes these calculations.

Table 11. Federal Costs for Facility-Based CCSF Review

Activity	Number of Responses	Hour Burden per Response	Annual Hour Burden	Annual Hour Burden Cost
	A	**B**	**C = A x B**	**D = C x $72.72**
New CCSSSP Program	60	10	600	$43,630
Recertification	475		4,750	$345,406
Security Coordinator Submissions	60	0.5	30	$2,182
Security Incident Reporting	15	10	150	$10,908
Total			**5,530**	**$402,125**

<u>TSA Costs for CCSF-K9 Applications, Security Coordinators, and Incident Reporting</u>

TSA estimated an annual average of three CCSF-K9 applications. CCSF-K9s are estimated to take an average 10 hours per entity requesting certification at a cost of $72.72 per hour for a TSA employee. The wage is based on the average loaded hourly wage rate for an I/J band TSA employee. TSA estimated that collecting security coordinator information and responding to security incident would involve 30 minutes (0.5 hours) and 10 hours, respectively. TSA hours for these responses would be 182 annually and cost $13,198. Table 12 summarizes these calculations.

Table 12. TSA Cost for CCSF-K9 Applications, Security Coordinators, and Incident Reporting

Annual Burden	Number of CCSF-K9 Responses	Hour Burden per Response	Annual Hour Burden	Hour Burden Cost
	(A)	**(B)**	**(C = A x B)**	**(D = C x $72.72)**
Applications	3	10	30	$2,182
Security Coordinator Submissions	3	0.5	2	$109
Security Incident Reporting	15	10	150	$10,908
Total Annual Average			**182**	**$13,198**

<u>TSA Costs for 3PK9-C Certifier Applications, Security Coordinators, and Incident Reporting</u>

TSA must review each 3PK9-C Certifier application. TSA predicts it will review an average of 5.33 applications, annually. Each 3PK9-C Certifier application is estimated to take 1.5 hours, for an average annual hour burden of eight hours (24 hours over three years). The average loaded hourly wage rate for TSA employees to review each application is $79.23.[15] For security coordinator submissions and incident reports, TSA estimates a cost of $72.72 per hour for a I/J band TSA employee, for collecting security coordinator information and responding to security

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[15] TSA estimates that three different TSA employees -- an I-band, J-band, and L-band -- will review each 3PK9-C Certifier application. Each will spend 30 minutes (0.5 hours) review the document, for a total of 1.5 hours to review an application. The wage rate used is a weighted average of the three employees: $79.23 = [($66.79 x 1) + ($78.65 x 1) + ($92.24 x 1)] ÷ (3).

incident reports at 30 minutes (0.5 hours) and 10 hours, respectively. The corresponding total annual hours are 161 and annual cost burden is $11,735. Table 13 summarizes these estimates.

Table 13. TSA Costs for 3PK9-C Certifier Applications, Security Coordinators, and Incident Reporting

Year	Number of 3PK9-C Responses	Hour Burden per Response	Total Hour Burden	Annual Hour Burden Cost
	(A)	(B)	(C = A x B)	(D = C(Applications) x $79.23)
Applications	5.33	1.50	8.00	$634
	(A)	(B)	(C = A x B)	(D = C(SC Submissions or Incidents) x $72.72)
Security Coordinator Submissions	5	0.5	3	$194
Security Incident Reporting	15	10	150	$10,908
Total Annual Average			**161**	**$11,735**

Note: Calculations may not be exact due to rounding.

STA Application Review

TSA must review every STA application it receives. As previously stated in Question 13, TSA estimates the time it takes to process 298 CCSF-K9s and 3PK9-C Certifiers STA applications a year, with each review taking 15 minutes (0.25 hours). The fully-loaded wage of the TSA employee reviewing these STAs is $72.72.[16] The annual total hour burden for these reviews is 74.5 hours. This corresponds to a total annual hour burden cost of $5,417. Table 14 summarizes the estimated number of STA reviews by population, and the corresponding time and cost burdens of these reviews.

Table 14. Hour Burden and Costs for CCSF-K9s and 3PK9-C Certifiers STA Review

Population	Number of STA Applications Received (A)	Hour Burden per Application (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x $72.72)
CCSF-K9	240		60.00	$4,363
CCSP-3PK9-C Certifiers	58	0.25	14.50	$1,054
Total	298		74.50	$5,417

Note: Calculations may not be exact due to rounding.

Annual Audit of CCSFs, CCSF-K9s and 3PK9-C Certifiers

As stated in Question 12, TSA will audit each CCSF, CCSF-K9, and 3PK9-C Certifier, annually. This translates to 12 audits a year per each entity, with each audit taking eight hours for TSA to complete (12x3 =36 x8 = 288). The fully-loaded wage rate of the TSA employees conducting

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[16] This is an average of the fully-loaded wages for an I-band employee ($66.79 an hour) and J-band employee ($78.65), where [$72.72 = ($66.79+78.65) ÷ (2)]. TSA assumes that both I-band and J-band employees will be reviewing these STA applications.

the audits is $72.72. The total annual hour burden is 288 hours. This corresponds to a total annual hour burden cost of $20,943.36. Table 15 summarizes these estimates below.

Table 15. Hour Burden and Costs for CCSFs 3PK9-C Certifiers(Annual) Audit

	Number of Audits	Hour Burden Per Audit	Total Hour Burden	Annual Hour Burden Cost
Annual Average	(A)	(B)	(C = A x B)	(D = C x $72.72)
TSA Audits	36	8	288.00	$20,943.36

Note: Calculations may not be exact due to rounding.

TSA Issued Amendments for Security Programs

If safety and the public interest require an amendment, TSA may amend the CCSSSP, CCSP-K9, and 3PK9-C Certifier Order. TSA estimates it will issue 10 amendments per year for each entity. Each amendment will take 40 hours to develop (10x3 = 30x40 = 1200.00). The fully-loaded wage of the designated TSA employee developing said amendment is $72.72. The total annual hour burden is 1200 hours, and will cost TSA a total annual hour burden cost of $87,264.00. Table 16 summarizes these estimates below.

Table 16. Hour Burden and Costs for TSA Issued Amendments for the CCSSSP and CCSP-K9

Annual Average	Number of Amendments (A)	Hour Burden per Amendment (B)	Total Hour Burden (C = A x B)	Hour Burden Cost (D = C x $72.72)
TSA Issued Amendments	30.0	40.00	1200.00	$87,264.00

TSA Total Costs

TSA estimates a total Federal Government cost of $540,682.36, and 7,435 hours, as summarized by Table 17 below.

Table 17. Total TSA Costs

TSA Costs	Annual Hours	Annual Costs
CCSF Applications, Recertification, Security Coordinators, and Incident Reporting	5,530	$402,125
CCSF-K9 Applications, Recertification, Security Coordinators, and Incident Reporting	182	$13,198
3PK9-C Certifier Applications, Recertification, Security Coordinators, and Incident Reporting	161	$11,735
STA Review for CCSFs and 3PK9-C Certifiers	74.50	$5,417
Annual Audit of CCSFs and 3PK9-C Certifier	288	$20,943.36
TSA Issued Amendments for the CCSSSP, CCSF-K9 Program and 3PK9-C Certifier	1200	$87,264.00

Annual Total TSA	7,435.50	540,682.36

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

TSA adjusted the burden to the collection to capture the actual information being collected. For the CCSFs Security Programs, TSA removed site visits as it is not an information collection, which reduced the annual burden hours by 190 hours. For 3PK9-C Certifier Order, TSA included 3PK9-C Certifier Amendments and TSA issued amendments, increasing the burden by 41 hours.

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 will 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.