

**Supporting Statement**  
**Application for Identification Card**  
**1651-0008**

**Justification**

- 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.**

CBP Form 3078, *Application for Identification Card*, is filled out in order to obtain an Identification Card that is used to gain access to CBP security areas. This form collects biographical information and is usually completed by airport employees, Broker's Employee, CBP Security Area Identification, Warehouse Officer or Employee, Container Station Employee, Foreign Trade Zone Employee, CES Employee, licensed Cartmen or Lightermen whose duties require receiving, transporting, or otherwise handling imported merchandise which has not been released from CBP custody. This form may be submitted electronically or to the local CBP office at the port of entry that the respondent will be requesting access to the Federal Inspection Section (FIS). Form 3078 is authorized by 19 U.S.C. 66, 1551, 1555, 1565, 1624, 1641; and 19 CFR 112.41, 112.42, 118, 122.182, and 146.6. This form is accessible at:

<https://www.cbp.gov/newsroom/publications/forms?title=3078&=Apply>

- 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 .**

Airport operators and in some cases, employers collect biographic information on Form 3078 and biometrics during the initial application process for the Secured Identification Display Area (SIDA) and submit the information to CBP for verification. This information is needed to determine the eligibility of an employee seeking entrance to the CBP FIS area. The Airport Operator or employer provides CBP with a Criminal History Record Check (CHRC) on the employees who need access to the FIS area. CBP submits the biometrics to the Federal Bureau of Investigation to verify identity and conduct a background investigation to determine whether the applicant meets the criteria's required for the issuance of a CBP Hologram Identification card.

- 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 .**

CBP Form 3078 is a fillable form on CBP's website at:

<https://www.cbp.gov/newsroom/publications/forms?title=3078&=Apply>. The Trusted Worker Program plans to fully automate the completion and submission of CBP Form 3078 through the use of a secure public facing portal where employers will be able to submit an application directly to be CBP on behalf of an applicant. Applicants who submit their applications online will be able to check the status and progression of their application, receive electronic communications, and receive electronic notification of a decision. Regulations change will be published before these changes are implemented.

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

This information is not duplicated in any other place or any other form. There are similar use collections within the Department (TSA, USCG), however, the data elements on CBP Form 3078 are not duplicative.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This information collection does not have an impact on small businesses or other small entities.

- 6. Describe consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If this information was not collected, CBP would have no way of securely vetting and identifying those authorized to enter CBP Federal Inspection Service Areas, Centralized Exam Stations, Foreign Trade Zone facilities, container stations, and facilities with bonded merchandise.

- 7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(2).

- 8. 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.

Public comments were solicited through two Federal Register notices published on March 30, 2021 (86 FR 16605) on which no comments were received, and on June 1, 2021 (86 FR 29272) on which no comments have been received.

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

There is no offer of a monetary or material value for this information collection.

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

A SORN for Persons Engaged in International Trade (Vol. 73, Page 77753), dated December 19, 2008 has been included in this ICR. No assurances of confidentiality are provided to respondents.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

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

<b>INFORMATION COLLECTION</b>	<b>TOTAL ANNUAL BURDEN HOURS</b>	<b>NO. OF RESPONDENTS</b>	<b>NO. OF RESPONSES PER RESPONDENT</b>	<b>TOTAL RESPONSES</b>	<b>TIME PER RESPONSE</b>
CBP Form 3078	56,600	200,000	1	200,000	17 minutes (.283 hours)

**Public Cost**

The estimated cost to the respondents is \$1,539,520. This is based on the estimated burden hours (56,600) multiplied by the average hourly wage rate for

truck drivers (\$27.20). CBP used the U.S. Department of Transportation's (DOT) recommended hourly values of travel time savings for Truck Drivers, which are provided in 2015 U.S. dollars. CBP assumes an annual growth rate of 0 percent; the 2015 U.S. dollar value is equal to the 2020 U.S. dollar value.<sup>1</sup>

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

**14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The estimated annual cost to the Federal Government associated with the review of this information collection is \$3,274,310. This is based on the number of responses that must be reviewed (200,000) multiplied by the time burden to review and process each response (17 minutes or .283 hours) = 56,600 hours multiplied by the average hourly loaded rate for other CBP employees (\$57.85)<sup>2</sup> = \$3,274,310.

**15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.**

There has been an increase in the estimated annual burden hours previously reported for this information collection due to the increased number of respondents and total reported responses. There is no change to the information collected or to CBP Form 3078.

**16. For collection of information whose results will be published, outline plans for tabulation, and publication.**

This information collection will not be published for statistical purposes.

**17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate.**

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<sup>1</sup> Source: U.S. Department of Transportation, Office of Transportation Policy. *The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2016 Update)*, "Table 4 (Revision 2 - 2016 Update): Recommended Hourly Values of Travel Time Savings for Truck Drivers." September 27, 2016. Available at <https://www.transportation.gov/sites/dot.gov/files/docs/2016%20Revised%20Value%20of%20Travel%20Time%20Guidance.pdf>. Accessed June 12, 2020.

<sup>2</sup> CBP bases this wage on the FY 2020 salary and benefits of the national average of other CBP positions, which is equal to a GS-12, Step 3. Source: Email correspondence with CBP's Office of Finance on July 2, 2020.

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

**18. “Certification for Paperwork Reduction Act Submissions.”**

CBP does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods**

No statistical methods were employed.