

INFORMATION COLLECTION SUPPORTING STATEMENT

Screening Partnership Program Application

OMB control number 1652-0064

Exp. 11/30/2021

- 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).**

In general, 49 U.S.C. 44901(a) requires all screening of passengers and property to be transported on passenger aircraft to be conducted by Federal personnel. Section 44920 of title 49, U.S.C., permits airports to opt-out of use of Federal personnel by submitting a request to the Transportation Security Administration (TSA) to use a qualified private screening company. If the application is approved, TSA contracts with a qualified private screening company, but maintains oversight over security screening. TSA implements this requirement through the Screening Partnership Program (SPP). Currently, 22 airports participate in the program. Participation in the SPP is initiated with the application covered by this information collection. Under 44920(b)(3)(B), TSA is also required to submit information to Congress regarding the approval or denial of applications.

- 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.**

To participate in the SSP, an airport operator must submit an application with basic information from the authorized requestor. This application is reviewed by TSA's SPP and granted approval or denial within 60 calendar days of receipt.¹

- 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 GPEA, airport operators submit the two-page SPP application via email to the airport's Federal Security Director (FSD).

¹ Section 1946 of the FAA Reauthorization Act of 2018 requires TSA to make a determination on an application not later than sixty (60) days of receipt of an application submitted by an airport operator. See FAA Reauthorization Act of 2018, Pub. L. No. 115-254, 132 Stat. 3186, 3585-3587 (October 5, 2018) (codified at 49 USC 44920(b)(1), 2018).

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.***

There is no similar information already held by TSA that could be used for the purpose of airport operators submitting applications to denote their interests in converting from a federally-staffed screening operation to a contractor-staffed screening operation.

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.***

Without receiving the information collected through the application, TSA would not be able to meet the requirements of 49 U.S.C. 44920.

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 information collection is conducted in a manner 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 two *Federal Register* notices with a 60-day and a 30-day comment period, soliciting comments on the information collection. See 86 FR 9358 (February 11, 2021) and 86 FR 26540 (May 14, 2021). The agency received a comment to the 60-day notice from an anonymous individual. The individual wanted the government to maintain security at the airports instead of allowing airports to choose a private screening company. The comment does not recognize that TSA's approval to use a qualified private screening company is pursuant to a statutory mandate. See 49 U.S.C. 44920. There were no comments in response to the 30-day notice.

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

No payment or gift will be provided to respondents.

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

The SSP Application is privacy sensitive as it collects personally identifiable information from members of the public. The applicable Privacy Impact Assessment is DHS/ALL/PIA-006, DHS General Contacts List. (June 15, 2007). As the SPP application does not request classified information, no special handling or protection is required.

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 nature.

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

TSA estimates the annual hour burden associated with completing and submitting the application for the SPP, covered by this information collection, to be 15 minutes (0.25 hours) per respondent. TSA estimates that two airport operators will respond annually, though it would be possible that ten or more airport operators could respond to the application request.² TSA assumes that respondent would be an Airport Director³, with a fully-loaded wage rate⁴ of \$94.02⁵.

TSA estimates a total hour burden cost to the public of \$141.02 for the three-year approval window, with an average annual estimated cost of \$47.01. Table 1 summarizes the annual hour burden cost calculations.

Table 1: Hour Burden and Hour Burden Cost for Respondents

Year	Number Of Respondents	Hour Burden to Respondents	Hour Burden Cost to Respondents
	A	$B = A \times 0.25$	$C = B \times \$94.02$
2021	2	0.5	\$47.01
2022	2	0.5	\$47.01
2023	2	0.5	\$47.01
Total	6	1.5	\$141.02
Annualized	2	0.5	\$47.01

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

Beyond the hourly burden, there are no respondent or recordkeeper costs estimated for this collection.

² TSA Program Office Estimate, Office of Security Operations, Security Screening Program. In accordance with the PRA, OMB approval must be obtained prior to collecting federally sponsored data in any situation where there could be 10 or more respondents. A respondent includes individuals; partnerships; associations; corporations; organized groups of individuals; and State, territory, tribal or local governments. Agencies must publish Federal Register notices describing the information collection, respondents and burden estimates for public comment.

³ TSA Program Office Estimate, Office of Security Operations, Security Screening Program.

⁴ A fully loaded wage rate accounts for the non-wage compensation costs borne by an employer, such as retirement contributions and health benefits, among other things.

⁵ TSA approximates the wage rate of an Airport Director, by using the wage rate for General and Operations Managers in the Air Transportation Industry (\$62.21). BLS. May 2019 Occupational Employment and Wages. NAISC 481000 - Air Transportation, 11-1021 General and Operations Managers. Last Modified Date: 3/31/2020. Retrieved 11/13/2020. https://www.bls.gov/oes/2019/May/naics3_481000.htm

TSA calculates a compensation of 1.5113 by dividing the Total Compensation of civil workers in the Production, transportation, and material moving Occupation group (\$30.18) by the wages and salaries of the same group (\$19.97). The compensation factor is therefore: (1.5113 = \$30.18/\$19.97). BLS, News Release, Employer Costs for Employee Compensation – September 2020. Table 2. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by major occupational and industry group: transportation, and material moving occupational group, September 2020. Release date December 17, 2020. https://www.bls.gov/news.release/archives/ecec_12172020.pdf. Retrieved 1/28/2021. TSA calculates the fully loaded wage rate by multiplying the wage rate for General and Operations Managers in the Transportation Sector by the compensation factor. The fully-loaded wage rate is therefore: (\$94.02= \$62.21 x 1.5113).

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 that it will take one-half hour (0.50 hours) for one FSD to receive one application for forwarding to the SPP. TSA estimates a total annual hour burden of one hour by multiplying the number of applications TSA receives and the time to process each application ($1 = 2 \times 0.5$). The estimated fully-loaded annual salary of a TSA FSD is \$237,542.⁶ TSA estimates an hourly wage rate of \$113.82.⁷ TSA calculates the annual costs to the Federal Government by multiplying the total annual hour burden of processing those application by the wage rate of a TSA FSD.

TSA estimates a total hour burden cost to the Federal Government of \$341.46 for the three-year approval window, with an average annual estimated cost of \$113.82. Table 2 summarizes the federal government cost calculations.

Table 2: TSA Hour Burden and Hour Burden Costs

Year	Number of Applications	Hour Burden of Applications	Hour Burden Cost of Applications
	A	$B = A \times 0.5$	$C = B \times \$113.82$
2021	2	1.0	\$113.82
2022	2	1.0	\$113.82
2023	2	1.0	\$113.82
Total	6	3.0	\$341.46
Annualized	2	1.0	\$113.82

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

This collection does not have program changes, but TSA adjusted estimated cost burdens based on latest wage rates.

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 would be inappropriate.

TSA SPP is not seeking such approval.

⁶ This wage rate is estimated using data provided by the TSA Office of Finance and Administration.

⁷ $\$237,542 \div 2,087 \text{ hours} = \113.82 .

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

TSA SPP is not seeking any exceptions to the certification statement as the information gathered for the application meets the criteria for 5 CFR 1320.9.