

SUPPORTING STATEMENT
Airport Security Program
49 CFR Part 1542

OMB Control No. 1652-0002
Exp. 9/30/2021

- 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).***

The Aviation and Transportation Security Act (ATSA), Public Law 107-71, (115 Stat. 597, Nov. 19, 2001), as codified at 49 U.S.C. § 114), transferred the responsibility for civil aviation security from the Federal Aviation Administration (FAA) to the Transportation Security Administration (TSA). As part of implementing its statutory responsibilities, part 1549 of title 49, Code of Federal Regulations (CFR), includes TSA's requirements applicable to airport operators. The information collection required by 49 CFR part 1542 includes compliance and recordkeeping requirements that directly support TSA's statutory responsibility for civil aviation security.

Under this information collection, respondent airport operators must comply with the following compliance and other recordkeeping requirements: (1) development of an Airport Security Program (ASP), submission to TSA, and implementation; (2) as applicable, development of airport operator requested or TSA-required ASP amendments and temporary changed conditions, submission to TSA, and implementation; (3) collection of data necessary to complete a criminal history records check (CHRC) for those individuals with unescorted access to a Security Identification Display Area (SIDA) or Sterile Area; (4) submission to TSA of identifying information about individuals to whom the airport operator has issued identification media, such as name, address, and country of birth, in order for TSA to conduct a Security Threat Assessment (STA); and (5) information collection and recordkeeping requirements associated with compliance with the regulation, employees who have access privileges to secure areas of the airport, and compliance with Security Directives (SDs) issued pursuant to the regulation.

- 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.***

Security Programs

Under 49 CFR 1542.101, airport operators that operate an airport subject to 49 CFR 1542.103 are required to adopt and carry out an ASP for each subject airport that provides for the safety and security of persons and property on an aircraft operating in air transportation or intrastate air transportation against an act of criminal violence, aircraft piracy, and the introduction of an unauthorized weapon, explosive, or incendiary onto an aircraft. Once approved by TSA, the airport operators must adhere to these programs, which specify the

systems, measures, and procedures the operators will use at each airport to comply with TSA requirements. Respondent airport operators are required to maintain these ASPs on file. When TSA Transportation Security Inspectors (TSIs) conduct inspections of airport operators to verify compliance with the provisions of the ASP, TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.

Security Program Amendments and Temporary Changed Conditions Affecting Security

Under 49 CFR 1542.105(b), the airport operator is permitted to update the ASP through amendments completed by the operator after approval by TSA. Under 1542.105(c) or (d), the airport operators must update the ASP consistent with amendments required by TSA. Section 1542.107 also requires airport operators to update their ASP for changed conditions affecting security occur at the airport, even if temporary. To make these updates, the airport operator must request an amendment to their program. Airport-initiated amendments are generally issued on a temporary basis.

For TSA-amendments and airport-initiated amendments, respondent airport operators are required to submit amendments and/or complete and implement amendments directed by TSA so that TSA TSIs can inspect those airport operators to verify compliance with the provisions of the TSA-approved program. Again, TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.

Background Checks, including Criminal History Records Checks/Security Threat Assessments

Under 49 CFR 1542.209 and related SDs, airport operators are required to conduct a CHRC for each individual with unescorted access to a SIDA or Sterile Area. To conduct a CHRC, these individuals must provide their identifying information to the airport operator, including fingerprints, and the airport operator must maintain these records. The purpose of a CHRC is to ensure that each individual having access to the SIDA or Sterile Area of an airport does not pose a risk to transportation security. The airport operators must also collect information for Security Threat Assessments (STAs) of individuals with unescorted access at airports to secured areas, SIDAs, sterile areas, and air operations areas. The purpose of the STA is to check intelligence-related and other governmental databases for relevant information about the individual to determine whether he or she poses a risk to transportation security. TSA requires airport operators to submit identifying information, such as name, address, and country of birth, about individuals so that the airport operator may, among other things, verify the individual's identity and authorization to work in the United States before the airport operator issues identification media.

Other Information Collection and Recordkeeping Requirements

There are several other recordkeeping requirements imposed by the regulations necessary to establish compliance with TSA's requirements.

- 49 CFR 1542.213(b) requires airport operators to ensure that no individual is authorized unescorted access to the secured area or SIDA unless that individual has successfully completed training in accordance with the TSA-approved curriculum specified in its TSA-approved ASP. The airport operator must maintain a record of all training and information given to each individual who receives such training, and must further maintain such records for no less than 180 days after the termination of that person's unescorted access authority. TSA regulatory inspectors then inspect those airport operators to verify compliance with the training provision of the TSA-approved program. Again, TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation.
- 49 CFR 1542.217(d) requires airport operators to maintain records associated with the training of the law enforcement officers (LEOs) assigned to respond at the airport. The airport operator must maintain a record of the type of training given to each LEO who receives such training.
- 49 CFR 1542.221 requires airport operators to ensure that a record is made of each law enforcement action made at the airport. The airport operator can maintain these records or allow the responding law enforcement agency to manage such records. The airport operator must maintain those records for a minimum of 180 days and allow for TSA inspection. TSA uses this information, together with information generated independently by TSA as it conducts its own passenger and baggage screening as well as other related activities, to monitor the effectiveness of the overall level of security in the system.
- 49 CFR 1542.303 requires airport operators to comply with each SD issued by TSA. When TSA determines that additional security measures are necessary to respond to a threat against civil aviation, TSA issues such a SD, which includes requirements for operators to maintain records and provide information to TSA. The airport operator must maintain an electronic record, paper record, or a comparable TSA-approved records verification system of the documents required to be collected under SDs. TSA uses the information obtained regarding regulatory compliance, individually by airport, and aggregated across the system, to establish the condition of the system and the effectiveness of its capability to prevent or deter terrorist or other criminal acts against civil aviation. If any airport operator is unable to meet a changed requirement, airport operators may apply for an alternate means by which they can satisfy the required TSA security measures. TSA handles such requests on a case-by-case basis.
- 49 CFR 1542.209(k) requires airport operators to maintain records of compliance for those employees with unescorted access privileges in SIDAs and Sterile Areas at the airport. These records include records of training and background checks on all employees who have such unescorted access. TSA TSIs review these records to ensure that the safety and security of the public is not compromised, and use this information to take corrective action when necessary.

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.]***

Airport operators have the flexibility to maintain or report the required information in a manner that best meets their particular operational needs. However, it is estimated that 70 percent of airport operators currently maintain most of these records electronically and may submit them through electronic mediums such as databases and secure portals. Thus, this collection is in compliance with the Government Paperwork Elimination Act (GPEA).

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.***

Prior to TSA's existence, this information collection was conducted by the FAA. To TSA's knowledge, since the responsibility for this collection transferred to TSA, with the exception of the information below, it has not been duplicated anywhere else.

The U.S. Customs and Border Protection (CBP) requires CHRCs be conducted on individuals with unescorted access to CBP's designated airport Federal Inspection Station (FIS) areas. Some individuals working at the airport may need access to the airport secured areas regulated by TSA and the FIS area controlled by CBP. Because a CHRC is required by both agencies for the same applicant, CBP and TSA created "eBadge," an automated interface that eliminates duplicative enrollments and CHRCs for individuals who need CHRCs for airport secured areas and the FIS.

In an effort to minimize any duplicate collections, TSA continually strives to work with and identify other entities that have a need to know the information in the performance of their official duties pursuant to the Privacy Act, 5 U.S.C. § 552A(b)(1), in an effort to reduce redundancy of information collection processes.

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

The amount of information required by this collection is proportional to the size of each airport operator's organization and therefore does not create 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.

TSA must ensure the security of persons and property traveling within, to, from, and over the United States. If TSA did not require the collection of information, TSA would be hindered in improving security procedures and systems at airports and in ensuring compliance with security compliance and recordkeeping requirements.

The agency's regulatory requirements for airport operators regularly serving commercial operations, including the requirement to adopt and implement an ASP, are intended to provide for the safety and security of persons and property on an aircraft operating in air transportation or intrastate air transportation against acts of criminal violence, aircraft piracy, and the introduction of an unauthorized weapon, explosive, or incendiary onto an aircraft. ASPs are necessary to ensure airport operators within the United States comply with the measures TSA has determined are necessary to provide adequate security. All collected information required by TSA regulations is subject to review during the TSA inspection process to verify airport operator compliance with regulatory requirements.

Due to the dynamic nature of security risks and assessments, it may be necessary, upon short notice, to require airport operators to perform certain security measures that involve maintaining records and providing information to TSA more often than regularly noted in its ASP. TSA conveys the need for such security measures to the airport operator via amendments to its ASP and/or by issuing SDs when appropriate. If TSA is not able to collect this information, the agency would not be able to meet its statutory obligation to ensure the security of the civil aviation.

TSA also uses data collected through this information collection to assess the need for revising security procedures, staffing, and other resource allocations.

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).

Under 5 CFR 1320.5(d)(2)(i), collecting agencies are required to demonstrate why a respondent must report more often than quarterly. For the requirements covered by this information collection, it may be necessary, upon short notice, to require airport operators to perform security measures that involve maintaining records and providing information to TSA more often than regularly noted in its ASP. TSA requires such security measures via amendments to the ASP and/or by issuing SDs when appropriate.

Under 5 CFR 1320.5(d)(2)(iv), collecting agencies are required to demonstrate why a respondent must retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years. For security purposes concerning the vetting of certain employees, the airport operator must retain records for 180 days after the end of employment of the individual, which could be more than three (3) years. In addition, section 1542.209(k)(5) of title 49 CFR requires all records to be maintained for at least 180 days after the termination of an individual's unescorted access to secure areas of airports. This record retention schedule needed for compliance purposes may require airport and aircraft

operators to maintain records of employees for over three years as described in 5 CFR 1320.5(d)(2)(iv).

Otherwise, the collection is conducted in accordance with 5 CFR § 1320.5(d)(2).

- 8. Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

TSA published a 60-day notice for comment, as required by 5 CFR § 1320.8(d), see 85 FR 83986 (Dec. 23, 2020), and a 30-day notice, see 86 FR 37174 (July 14, 2021). TSA received no comments.

- 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 the 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 assurances of confidentiality. Information provided by individuals will be protected from disclosure to the extent appropriate under the applicable provision of the Freedom of Information Act and the Privacy Act of 1974. Personally identifying information will be collected and transmitted in accordance with the Privacy Act. To the extent that the information collected is Sensitive Security Information (SSI) as defined in 49 CFR part 1520, "Protection of Sensitive Security Information," such information is protected from public disclosure.

Additionally, 49 CFR 1542.209(k)(4) and 1544.229(k)(3), and a related Security Directive, require airport and aircraft operators to maintain records in a manner that protects confidentiality of the individual and is acceptable to TSA.

The applicable Privacy Impact Assessment (PIA) is DHS/TSA/PIA-020 Security Threat Assessment for Airport Badge and Credential Holders; the applicable System of Records Notice (SORN) is DHS/TSA-002 Transportation Security Threat Assessment System.

- 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.**

There are no questions of sensitive nature.

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

Security Programs:

New Security Programs

TSA estimates an average of approximately 1 respondent¹ per year will create an ASP. TSA estimates that it takes approximately 500 hours to create an ASP.² TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinator's value of time (opportunity cost).³

TSA estimates that the average annual burden to create an ASP is 500 hours, resulting in an hour burden cost of \$45,216. Table 1 shows the hour burden and cost estimation.

Table 1: Total Hour Burden Estimate for New Security Programs

New ASP	Average Annual Respondents New ASP	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$90.43
	1	1	500	500	\$45,216

Note: Calculations may not be exact due to rounding in the table.

Security Program Amendments:

TSA-Directed Amendments

TSA estimates that an average of approximately 438 respondents will be implementing TSA-directed amendments annually, and one response per respondent per year. TSA estimates that it takes approximately 250 hours to add to their ASP any amendments promulgated by TSA.⁴ TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinator's value of time (opportunity cost).⁵

¹ Estimate provided by TSA Office of Policy, Plans, and Engagement (PPE) subject matter expert.

² Ibid.

³ TSA uses the average hourly wage rate of \$62.21 for General and Operations Managers as a proxy wage rate for the security coordinator at an airport. BLS, May 2019 National Industry-Specific Occupational Employment and Wage Estimates, General and Operations Managers (11-1021). Last modified: March 31, 2020. https://www.bls.gov/oes/2019/may/naics3_481000.htm. Retrieved: September 29, 2020. TSA uses the compensation factor for all full-time workers in private industry as a proxy for security coordinators at airports. For all full-time workers in private industry, hourly total compensation is \$41.40 and hourly wages and salaries are \$28.47. TSA estimates the compensation factor as 1.453652 (\$41.40 ÷ \$28.47). BLS, News Release, Employer Costs for Employee Compensation - June 2020. Table 5. 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, June 2020. Release date: September 17, 2020. https://www.bls.gov/news.release/archives/ecec_09172020.htm. Retrieved: September 29, 2020. TSA estimates that the fully loaded average hourly wage rate is \$90.43167 (\$62.21 × 1.453652).

⁴ Ibid.

⁵ See footnote 3.

TSA estimates that the average annual burden to add to their ASP any amendments promulgated by TSA is 109,500 hours, resulting in an hour burden cost of \$9,902,268. Table 2 shows the hour burden and cost estimation.

Table 2: Total Hour Burden Estimates for TSA-Directed Amendments

TSA-Directed Amendments	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	$D = A \times B \times C$	$E = D \times \$90.43$
	438	1	250	109,500	\$9,902,268

Note: Calculations may not be exact due to rounding in the table.

Airport-Requested Amendments

TSA estimates that an average of approximately 438 respondents will request amendments annually, with 10 responses per respondent. TSA estimates that it takes approximately 25 hours to prepare each amendment.⁶ TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinator's value of time (opportunity cost).⁷

TSA estimates that the average annual burden to prepare Airport-Requested Amendments is 109,500 hours, resulting in an hour burden cost of \$9,902,268. Table 3 shows the hour burden and cost estimation.

Table 3: Total Hour Burden Estimates for Amendments-Airport-Requested

Amendments-Airport-Requested	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	$D = A \times B \times C$	$E = D \times \$90.43$
	438	10	25	109,500	\$9,902,268

Note: Calculations may not be exact due to rounding in the table.

Amendments for Temporary Changed Conditions

TSA estimates that an average of approximately 438 respondents will be issued amendments to their ASP on the basis of temporary changes in conditions annually, and 15 amendments per respondent per year. TSA estimates that it takes approximately 40 hours to prepare each amendment.⁸ TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinator's value of time (opportunity cost).⁹

TSA estimates that the average annual burden to prepare amendments for temporary changed conditions is 262,800 hours, resulting in an annual hour burden cost of \$23,765,443. Table 4 shows the hour burden and cost estimation.

⁶ Ibid.

⁷ See footnote 3.

⁸ Ibid.

⁹ See footnote 3.

Table 4: Hour Burden for Amendments Temporary Changed Conditions

Amendments- Temporary Changed Conditions	Average Annual Respondents	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$90.43
	438	15	40	262,800	\$23,765,443

Note: Calculations may not be exact due to rounding in the table.

Background Checks, including Criminal History Records Checks/Security Threat Assessments:

CHRC Applications

STAs are done for a broad population of airport badge holders, while CHRCs are done on a smaller population found within the greater airport badge holder population. TSA estimates that an average of approximately 948,698 respondents will have CHRC applicants annually.¹⁰ TSA estimates that it takes approximately 0.5 hours (30 minutes) to apply for a CHRC.¹¹ TSA uses the fully loaded average hourly wage rate of \$33.22 to estimate the applicant's value of time (opportunity cost).¹²

TSA estimates that the average annual burden to complete the CHRC application is 474,349 hours, resulting in an average annual hour burden cost of \$15,759,615. Table 5 shows the hour burden and cost estimation.

¹⁰ Under 49 CFR § 1542.209 and related SD, airport operators are required to subject each individual with unescorted access to a SIDA or Sterile Area to a CHRC in order to determine whether the individual has a disqualifying criminal offense within a relevant time-frame.

¹¹ See footnote 1.

¹² TSA uses a weighted average hourly wage rate of \$22.86 for Aircraft Cargo Handling Supervisors, Laborers and Material Moving Workers, and Laborers and Freight, Stock, and Material Movers, Hand as a proxy wage rate for the airport employees requiring a CHRC. BLS, May 2019 National Industry-Specific Occupational Employment and Wage Estimates, Aircraft Cargo Handling Supervisors (53-1041); Material Moving Workers (53-7000); Laborers and Freight, Stock, and Material Movers, Hand (53-7062). Last modified: March 31, 2020. https://www.bls.gov/oes/2019/may/naics3_481000.htm#53-0000. Retrieved September 29, 2020. To account for benefits, TSA uses the compensation factor for all full-time workers in private industry as a proxy for the airport employees requiring a CHRC. For all full-time workers in private industry, hourly total compensation is \$41.40 and hourly wages and salaries are \$28.48. TSA estimates the compensation factor as 1.4705 (\$41.40 ÷ \$28.48). BLS, News Release, Employer Costs for Employee Compensation - June 2020. Table 5. 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, June 2020. Release date: September 17, 2020. https://www.bls.gov/news.release/archives/ecec_09172020.htm Retrieved: September 29, 2020. TSA estimates that the fully-loaded, weighted average hourly wage rate is \$33.22367.

Table 5: Total Hour Burden for CHRC Applications

CHRC Applications	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$33.22
Average	948,698	0.5	474,349	\$15,759,615

Note: Calculations may not be exact due to rounding in the table.

STA Applications

TSA estimates that approximately 1,126,893 airport badge holders¹³ will have STA applications per year, and that it takes 0.35 hours (21 minutes) to complete the STA application. TSA uses the fully loaded average hourly wage rate of \$33.22 to estimate the applicants' value of time (opportunity cost).¹⁴

TSA estimates that the average annual burden to complete the STA application is 394,413 hours, resulting in an average annual hour burden cost of \$13,103,833. In addition, airport operators will also enter information into the Designated Channeling (DAC) System for each STA applicant. TSA estimates that each STA application takes 0.25 hours (15 minutes) to enter into the DAC. TSA uses the fully loaded average administrative hourly wage rate of \$29.33 to estimate the value of time (opportunity cost).¹⁵ The time burden to enter data into the DAC is 281,723 hours, and the time burden cost is \$8,264,264. Table 6 shows the hour burden and cost estimation to complete the STA application, the hour burden and cost estimation to enter data into the DAC, and the total hour and cost burden for STAs.

¹³ See footnote 1.

¹⁴ See footnote 13.

¹⁵ TSA uses a weighted average hourly wage rate of \$20.18 for Office Clerks, General as a proxy wage rate for the airport employees entering data into the DAC. BLS, May 2019 National Industry-Specific Occupational Employment and Wage Estimates, Office Clerks, General (43-9061). Last modified: March 31, 2020. https://www.bls.gov/oes/2019/may/naics3_481000.htm#43-0000. Retrieved September 29, 2020. To account for benefits, TSA uses the compensation factor for all full-time workers in private industry as a proxy for airport employees entering data into the DAC. For all full-time workers in private industry, hourly total compensation is \$41.40 and hourly wages and salaries are \$28.48. TSA estimates the compensation factor as 1.4705 (\$41.40 ÷ \$28.48), and that the fully-loaded average hourly wage rate is \$29.33469. BLS, News Release, Employer Costs for Employee Compensation - June 2020. Table 5. 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, June 2020. Release date: September 17, 2020. https://www.bls.gov/news.release/archives/ecec_09172020.htm. Retrieved September 29, 2020.

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Table 6: Total Hour Burden Estimates for STA Applications

STA Applications	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost	Hour Burden to Enter Data Into DAC	Average Annual Hour Burden to Enter Data Into DAC	Total Average Annual Hour Burden for STA Applications	Average Annual Hour Burden Cost to Enter Data Into DAC	Total Cost Burden for STA Applications
	A	B	$C = A \times B$	$D = C \times \$33.22$	E	$F = A \times E$	$G = C + F$	$H = F \times \$29.33$	$I = D + H$
Average	1,126,893	0.35	394,413	\$13,103,833	0.25	281,723	676,136	\$8,264,264	\$21,368,097

Note: Calculations may not be exact due to rounding in the table.

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Other Information Collection and Recordkeeping Requirements:

CHRC/STA Recordkeeping

TSA estimates that an average of 1,126,893 respondents¹⁶ will fulfill the CHRC and STA paperwork recordkeeping maintenance requirement annually, and that this task will be done by the security coordinator. TSA estimates that it takes approximately 0.083 hours, or five minutes, per response to fulfill the CHRC and STA paperwork recordkeeping maintenance requirement. TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinator’s value of time (opportunity cost).¹⁷

TSA estimates that the average annual burden to fulfill the CHRC and STA paperwork recordkeeping maintenance requirement is 93,908 hours, resulting in an annual hour burden cost of \$8,492,235. Table 7 shows the hour burden and cost estimation.

Table 7: Total Hour Burden Estimates for CHRCs/STA Records

CHRC/STA Records	Average Annual Responses	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$90.43
	1,126,893	0.083	93,908	\$8,492,235

Note: Calculations may not be exact due to rounding in the table.

SIDA Training Recordkeeping

¹⁶ See footnote 1.

¹⁷ See footnote 3.

TSA estimates that an average of 948,698 respondents¹⁸ will be subject to maintain SIDA training records annually, and that this task will be done by the security coordinator. TSA estimates that it takes approximately 0.083 hours, or five minutes per response to maintain SIDA training records.¹⁹ TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinators' value of time (opportunity cost).²⁰

TSA estimates that the average annual burden to maintain SIDA training records is 79,058 hours, resulting in an annual hour burden cost of \$7,149,362. Table 8 shows the hour burden and cost estimation.

Table 8: Total Hour Burden for SIDA Training Records

SIDA Training Records	Average Annual Responses	Hour Burden per response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$90.43
Average	948,698	0.083	79,058	\$7,149,362

Note: Calculations may not be exact due to rounding in the table.

LEO Training and Response Recordkeeping

TSA estimates that an average of 438 respondents²¹ will fulfill this LEO training and response recordkeeping requirement annually, with one response per respondent, and that this task will be done by the security coordinator. TSA estimates that it takes approximately 200 hours to fulfill the LEO training and security response recordkeeping requirement.²² TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinators' value of time (opportunity cost).²³

TSA estimates that the total annual burden to fulfill the LEO training response recordkeeping requirement is 87,600 hours, resulting in an annual hour burden cost of \$7,921,814. Table 9 shows the hour burden and cost estimation.

Table 9: Total Hour Burden for LEO Training and LEO Response

LEO Training and LEO	Average Annual Respondents	Average	Hour	Average	Average
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¹⁸ See footnote 1.

¹⁹ See footnote 1.

²⁰ See footnote 3.

²¹ See footnote 1.

²² See footnote 1.

²³ See footnote 3.

Response		Annual Responses per Respondent	Burden per Response	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$90.43
	438	1	200	87,600	\$7,921,814

Note: Calculations may not be exact due to rounding in the table.

Other Information Collection and Recordkeeping Requirements for SDs

TSA estimates that 438 respondents will comply with additional recordkeeping requirements and other reporting information collections resulting from SDs. TSA estimates that it takes approximately 24 hours to fulfill these additional requirements. TSA uses the fully loaded average hourly wage rate of \$90.43 to estimate the security coordinator's value of time (opportunity cost).²⁴ TSA estimated that the total hour burden for this requirement to be 10,490 and hour burden cost to be \$948,628. Table 9 shows the hour burden and cost estimation.

Table 10: Total Hour Burden for Other Information Collection and Recordkeeping Requirements for SDs

SD Recordkeeping	Average Annual Respondents	Average Annual Responses per Respondent	Hour Burden per Response	Average Annual Hour Burden	Average Annual Hour Burden Cost
	A	B	C	D = A x B x C	E = D x \$90.43
	438	1	24	10,490	\$948,628

Note: Calculations may not be exact due to rounding in the table.

In total, the average estimated annual hour burden for airport operators to fulfill the requested information collections is 1,903,841 hours and the total annual hour burden cost is \$105,254,947. Error: Reference source not found shows the total hour burden and cost for this information collection.

²⁴ See footnote 3.

Table 11: Total Average Annual Hour Responses, Burden, and Burden Cost

	New Security Programs	TSA-Directed Amendments	Airport-Requested Amendments	Amendments Temp. Changed Conditions	CHRC Applications	STA Applications	CHRCs/STA Recordkeeping	SIDA Training & Recordkeeping	LEO Training & Response	SD Reporting and Recordkeeping	Total
	Table 1	Table 2	Table 3	Table 4	Table 5	Table 6	Table 7	Table 8	Table 9	Table 10	
Average Annual Responses	1	438	4380	6,570	948,698	1,126,893	1,126,893	948,698	438	438	4,163,447
Average Annual Hour Burden	500	109,500	109,500	262,800	474,349	676,136	93,908	79,058	87,600	10,490	1,903,841
Average Annual Hour Burden Cost	\$45,216	\$9,902,268	\$9,902,268	\$23,765,443	\$15,759,615	\$21,368,097	\$8,492,235	\$7,149,362	\$7,921,814	\$948,628	\$105,254,947

Note: Calculations may not be exact due to rounding in the table.

TSA does not anticipate any additional recordkeeping burdens for software requirements and storage costs as these are already maintained as part of current industry practices.

SUPPORTING STATEMENT
Airport Security Program
49 CFR Part 1542

OMB Control No. 1652-0002
Exp. 07/31/2018

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

Employees requiring a CHRC must have their fingerprints taken and submitted to TSA. While airport operators actually collect this information and submit it to TSA, the fees are usually paid by the individual requesting access to the sterile area, secure area, air operations area, or SIDA. TSA uses the fee of \$56.55,²⁵ to estimate the annual cost to respondents for CHRC fees of \$53,650,275 (948,698 average annual responses x \$56.55). Table 10 shows the annual cost to respondents for CHRC fees.

Table 10: Total Estimated Annual Cost to Respondents for CHRC Fees

CHRCs Fees	Average Annual Responses	Cost Burden per Response	Average Annual Cost Burden
	A	B	C = A x B
Average	948,698	\$56.55	\$53,650,275

Note: Calculations may not be exact due to rounding in the table.

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 uses the fully loaded average hourly wage rate of \$40.44,²⁶ to estimate TSA employees' cost to conduct inspections of airport operators. TSA estimates that TSA (or the Federal Government) incurs an average annual burden of 28.5 hours per airport to conduct inspections of airport operators, resulting in an annual hour burden cost of \$504,813. Table 13 shows the total hour burden cost estimate for TSA.

²⁵ In 2011, the National Air Trade Association (NATA) charged a fee for this service ranging from \$29 to \$75. TSA used the midpoint of this range, \$52 in previous information collection renewals, TSA adjusted this fee to 2019 dollars based of the GDP deflator from 2011 to 2019. TSA calculated the GDP deflator of 1.08752 by dividing the Price Index for GDP of 112.358 in 2019 by 103.315 in 2011. TSA then multiplied the \$52 by 1.08752 to get \$56.55. BEA National Data, Table 1.1.4. Price Indexes for Gross Domestic Product, Line 1 Gross Domestic Product. Last revised: September 28, 2017. Retrieved: October 1, 2020.

²⁶ The total compensation for H Band (equivalent to GS -9/11) TSA personnel is \$84,399.33 per year (including locality adjustment and other benefits). Source: Modular Cost Standards FY18, TSA Financial Management Division. \$40.44 = \$84,399.33 ÷ 2,087 annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. L. 99-272, 100 Stat. 82, April 7, 1986) Source: Consolidated Omnibus Budget Reconciliation Act.

Table 13: TSA Total Hour Burden Cost

Loaded Hourly Wage Rate H Band (TSA TSI)	Number of Airports	Number of Hours	Total TSA Costs
A	B	C	D = A x B x C
\$40.44	438	28.5	\$504,813

Note: Calculations may not be exact due to rounding in the table.

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

TSA revised its burden estimates from the previous Information Collection Request submission based on the latest available data. There was a change in both the number of responses and burden hours associated with this collection. There was an increase in the wage rate of a TSA TSI who conducts inspections of airport operators, and a decrease in the total annual cost burden. There was a decrease in the wage rate of airport employees requiring a CHRC. The hour and cost burdens for STAs has increased because of entering information into the DAC for STA applicants. Although entry into the DAC system is not a new task, TSA did not capture this burden in previous versions of this information collection request (ICR).

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.

This information collection will not be published for statistical purposes.

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