

INFORMATION COLLECTION SUPPORTING STATEMENT

1652-0051 Rail Transportation Security Exp. 9/30/2022

- 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).**

This information collection will enhance the security of the Nation's freight and passenger rail systems. Under 49 U.S.C. 114, the Transportation Security Administration (TSA) has broad authority to secure all modes of transportation, including rail. Pursuant to this authority, TSA promulgated rail transportation security regulations in 2008 and 2019, codified at 49 CFR parts 1570, 1580, and 1582. These regulations require certain freight railroad carriers, passenger railroad carriers, rail transit systems, rail hazardous materials shippers ("shippers"), and rail hazardous materials receivers ("receivers") to maintain and/or submit information to TSA.

Security Coordinator

- 49 CFR 1570.201 requires freight railroad carriers, certain rail hazardous materials shipper and receiver facilities, passenger railroad carriers, and rail mass transit systems to designate and submit contact information for a security coordinator and at least one alternate security coordinator who will serve as the primary contact for intelligence information and security-related activities and communications with TSA. Security coordinator contact information includes the individual's name, title, phone number(s), email address(es), and U.S. citizenship status.¹

Location and shipping information

- 49 CFR 1580.203 requires freight railroad carriers, hazardous materials shippers, and hazardous materials receivers in a high threat urban area (HTUA) that handle certain categories and quantities of hazardous materials set forth in section 1580.3, known as "rail security-sensitive materials" (RSSM), to provide location and shipping information on rail cars under their physical custody and control to TSA upon request. The specified categories and quantities of RSSM cover explosive materials, materials poisonous by inhalation, and radioactive materials. Information concerning the location of these rail cars would be critical to decisions concerning possible rerouting, stopping, or otherwise protecting shipments and populations to address specific security threats or incidents.

Reporting significant security concerns

- 49 CFR 1570.203 requires freight railroad carriers, certain rail hazardous materials shipper and receiver facilities, passenger railroad carriers, and rail mass transit systems to report to TSA significant security concerns, which include security

¹ The requirements of this section also apply to certain over-the-road bus owner/operators and owner/operators of bus-only public transportation systems. The collection of information associated with bus operations is covered by OMB Control No. 1652-0066; Security Training Program for Surface Transportation Employees.

incidents, suspicious activities, and threat information.² Detecting terrorist activities entails piecing together seemingly unrelated or minor observations, encounters, and incidents and analyzing information from other sources to identify indications of planning and preparation for an attack.

Chain of custody and control requirements

- 49 CFR 1580.205 requires a secure chain of physical custody for rail cars containing RSSM which, in turn, requires freight railroad carriers and certain hazardous materials shippers and receivers of RSSM to document the transfer of custody of certain rail cars in writing or electronically and to retain these records for a minimum of 60 calendar days. Specifically, section 1580.205 requires documentation of the secure exchange of custody of rail cars containing RSSM between: a rail hazardous materials shipper and a freight railroad carrier; two separate freight railroad carriers, when the transfer of custody occurs within a HTUA, or outside of an HTUA, but the rail car may subsequently enter an HTUA; and a freight railroad carrier and a rail hazardous materials receiver located within an HTUA. The documentation must uniquely identify that the rail car was attended during the transfer of custody, including car initial and number; identification of individuals who attended the transfer (names or uniquely identifying employee number); location of transfer; and date and time the transfer was completed. This section addresses the risk that rail cars left unattended in a non-secure area may be vulnerable to tampering. These situations create opportunities for individuals to compromise the security of rail cars transporting poisonous inhalation hazard, explosive, or radioactive material through tampering with valves or the placement of a covert explosive device.

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.

All information collected from covered entities is used by TSA and DHS to enhance the security of the Nation's rail systems.

Security Coordinator Information

TSA collects security coordinator information via email, and regular mail. Security coordinator information provides TSA with a point of contact for covered entities, and TSA has used this contact information to build a contacts database that allows TSA to provide timely notification of vital security information to large groups of stakeholders.³

² Id.

³ This collection does not include cybersecurity coordinators nor reporting cybersecurity incidents; however, security coordinators must report significant security concerns to TSA, which includes the reporting of cyber attacks. As defined in Appendix A to 49 CFR Part 1570 - *Reporting of Significant Security Concerns*, a cyber attack is "compromising, or attempting to compromise or disrupt the information/technology infrastructure of an owner/operator subject to this part." In November 2021, DHS updated the definition of cybersecurity incidents for purposes of the Security Directive (SD) 1580-21-01, SD 1582-21-02, and an "information circular (IC)." The cybersecurity incidents definition is broader than cyber attacks. OMB approved the information collections included in the SDs and ICs. See OMB control number 1652-0074 *Cybersecurity Measures for Surface Modes*, which involves the submission of data concerning the designation of a Cybersecurity Coordinator and reporting of cybersecurity incidents to the Cybersecurity and Infrastructure Security Agency.

Location and Shipping Information

TSA collects location and shipping information pursuant to 49 CFR 1580.203 via electronic data transmission, by facsimile transmission, posting to a secure website, and other formats approved by TSA. Location and shipping information will primarily be used in times of heightened threat or attack to ascertain the location and number of potential targets in a specified geographic area so that the appropriate countermeasures can be implemented.

Significant Security Concerns Information

TSA collects significant security concerns information from freight railroad carriers, shippers, and receivers in an HTUA that handle certain categories and quantities of materials set forth in 49 CFR 1570.203, and analyzes this information to develop threat assessments and guide the allocation of security resources with the overall goal to deter or detect a terrorist attack. TSA also collects significant security concerns information from passenger railroad carriers and rail transit systems, and analyzes this information to develop threat assessments and guide the allocation of security resources with the overall goal to deter or detect a terrorist attack. TSA includes an electronic reporting options for submitting significant security concerns through email, a secure website, or other format approved by TSA.⁴

Chain of Custody and Control Documentation (recordkeeping requirement)

TSA inspects for covered parties' compliance with the documentation requirements for the secure exchange of custody of rail cars carrying RSSM pursuant to 49 CFR 1580.205. This is required to ensure that certain rail cars are not left unattended in non-secure areas. Covered parties must document the exchange of custody, and may do so electronically or in writing.

3. ***Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]***

In compliance with the GPEA, TSA encourages electronic submissions for this information collection to decrease submission and collection burdens on the covered parties and on the government. TSA permits some of the information to be provided in whatever format the regulated party chooses, including email and telephone. Automated submissions will not be allowed for certain aspects of the collection, as TSA requires the human point of contact for providing the specifics of its request for car location and shipping information, and to ensure that the documented chain of custody and control was attended or in a secure area when the covered rail cars were exchanged.

TSA is revising the collection to provide an additional electronic option for reporting significant security concern information. When initially promulgated in 2008, the regulation specifically required that the reporting to TSA be conducted telephonically. In 2019, TSA

⁴ Id.

revised the regulation to provide more flexibility to allow the information to be submitted using the method prescribed by TSA. See 49 CFR 1570.203(a). While collecting significant security incidents telephonically provides a degree of expediency, in that the reporting party does not necessarily need to prepare a written document prior to making a report to TSA, railroads have requested the ability to submit information electronically. Based on the request from the railroads, TSA initiated the Proof of Concept (POC) program in February 2020 to test electronic reporting of significant security concerns by the railroad industry. Results of the POC demonstrate that electronic submissions can be utilized as an alternative to telephonic reporting in most instances. In general, electronic reports were found to be more detailed when compared to telephonic reporting; improved ease of use and accuracy of reported data; and reduced the need for subsequent calls to address transcription errors and collect additional information, leading to expedited analysis of security concerns. TSA does not require that a specific form be used for submitting information electronically as long as the information provided is consistent with the requirements of the information collection. The respondent population will continue to be able to report significant security concern information telephonically.

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 order to avoid duplication of other reporting requirements, in the initial submission of the information collection request (ICR), TSA worked with the Coast Guard; the relevant modal administrations of the Department of Transportation (DOT), including the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Federal Railroad Administration (FRA); and the Nuclear Regulatory Commission. TSA believes these reporting requirements are not duplicative because each supports a particular agency mission and programmatic purpose. TSA has since worked with PHMSA, and again concluded that the reporting requirements are not duplicative of any information PHMSA collects.⁵

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 information collection impacts small businesses; however, TSA has determined that the collection will not have a significant impact on a substantial number of small businesses. In order to minimize any burden this information collection creates, TSA is allowing submission of information electronically for most of the requirements.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information collection were not conducted, TSA's ability to enhance the security of the Nation's rail systems would be hindered. TSA has carefully tailored its information collection activities to only those collections that are necessary to support its security programs. Because the collection as described in this statement are regulatory requirements

⁵ Id.

under 49 CFR parts 1570, 1580, and 1582 the following obstacles exist to reduce the reporting or recordkeeping burden:

Security Coordinator Information

Security coordinators are a vital part of transportation security, providing TSA and other government agencies with an identified point of contact with access to company leadership and knowledge of the owner/operators' operations, in the event it is necessary to convey extremely time-sensitive information about threats or security procedures to an owner/operator, particularly in situations requiring frequent information updates. The security coordinator and alternate provide TSA with a contact in a position to understand security problems; immediately raise issues with, or transmit information to, corporate or system leadership; and help recognize when emergency response action is appropriate. The individuals must be accessible to TSA 24 hours per day, 7 days per week. Without the collection of security coordinator information (and an alternate), TSA's goal of two-way information sharing with owner/operators would be impacted in three ways. First, timely threat information, security guidance, information circulars and other TSA/DHS security products would not reach potentially impacted populations in a timely fashion. Second, TSA would be unable to create a one-on-one relationship with covered parties that would facilitate information flow between the covered party and TSA. Third, a main function of the SC, to serve as TSA's primary contact for security information and communications and to coordinate security practices with other entities, would be impossible if TSA and other entities are not aware of the SC's identity. Because covered parties are required to report security coordinator information only once initially, with follow-up reporting required within 37 days only if the security coordinator information changes, it is not practical for TSA to reduce the reporting burden.

Location and Shipping Information

During heightened threat or an incident, TSA uses the location and shipping information to identify whether there are any cars carrying explosives, toxic inhalation hazards, or radioactive material in or near high population areas or potential targets, and to initiate appropriate mitigation measures. While TSA may collect this information at any time, as a general practice, TSA limits its collection of location and shipping information to times of heightened security threat, natural disasters, and a sufficient number of inspections to ensure the covered parties' ability and willingness to comply with 49 CFR 1580.203.

Significant Security Concerns Information

Consistent with TSA's authority to "assess threats to transportation," 49 U.S.C. 114(f)(2), TSA requires covered entities to report significant security concerns, which includes incidents, suspicious activities, and threat information. While immediate threat information must be provided to first responders, the information collected through this requirement allows DHS to develop a broader picture of terrorist threats, piecing together seemingly unrelated or minor observations, encounters, and incidents and analyzing information from various sources to identify indications of planning and preparations of attack. Without this collection, TSA/DHS will lack sufficient information for analysis to assist in detecting threats to rail transportation.

Chain of Custody and Control Documentation

TSA requires affected freight railroad carriers and shippers and receivers of rail security-sensitive materials to document the exchange of custody and control of rail cars carrying

RSSM to ensure that covered entities comply with all other requirements of that section. Without this collection, TSA is unable to ensure that rail cars containing covered materials are attended during the exchange of custody and therefore, not left unattended in a non-secure area and vulnerable to sabotage while awaiting transfer. This collection cannot be accomplished less frequently because it is immediate verification of compliance with a regulatory requirement.

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).

In the interest of transportation security and to aid in detecting terrorist activities, covered parties need to report significant security concerns as they occur in order to ensure timely reporting of incidents, suspicious activities, and threat information. For the same reasons, TSA requires reporting of location and shipping information on rail cars in their physical custody and control to TSA upon request. Both of these situations may require reporting more frequently than on a quarterly basis (5 CFR 1320.5(d)(2)).

Specifically, TSA requires shippers, receivers, and Class II and III railroads, which include small businesses, to respond to TSA's request within 30 minutes of a TSA notification. TSA may approve a longer period of time based on the threat and the covered party's circumstances. TSA existing practices also provide covered parties with the choice to respond using a variety of TSA-approved methods.

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 *Federal Register* notice, with a 60-day comment period soliciting comments of the collection of information. See 86 FR 72990 (December 23, 2021). Additionally, TSA published a 30-day notice in the *Federal Register*. See 87 FR 28029 (May 10, 2022). These notices did not generate any comments on the collection of information.

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.

To the extent applicable, security information submitted to TSA or collected by TSA representatives will be treated as sensitive security information (SSI) under 49 CFR part

1520. This information collection is covered by a Privacy Impact Assessment (PIA), DHS/TSA/PIA-038 Performance and Results Information System (PARIS) (September 18, 2012). PARIS maintains personally identifiable information about individuals, including witnesses, involved in security incidents or regulatory enforcement activities.

Security Coordinator Information

The personal information of security coordinators provided to TSA under this collection will not normally be shared with organizations external to DHS. However, if needed for official business purposes, the information may be shared with other Federal, State, local, or tribal government agencies, including DOT. Federal agencies are subject to the safeguarding requirements of the Federal Information Security Management Act, Title III of the E-Government Act, Pub. L. 107-347 (FISMA) and the Privacy Act of 1974. To the extent that information is shared with non-Federal entities, such as State, local, or tribal Government agencies, TSA expects that information will be safeguarded in accordance with procedures designed to protect such information.

Location and Shipping Information

Location and shipping information required by 49 CFR 1580.203, maintained and submitted by the regulated party, is not considered SSI. When DHS or DOT receives the location and shipping information provided by the regulated party, it is included as part of a broader analysis of the location of rail cars subject to the location reporting requirement. This compilation, not the raw data, constitutes SSI under revised 49 CFR 1520.5(b)(12). Such compilations require greater protection than the information maintained by the regulated party for its business purposes because the release of a compilation of location and shipping information to the public would increase the risk that the compiled information could be used to identify vulnerabilities or to plan an attack on critical assets.

Significant Security Concerns Information

Under 49 CFR 1520.5(b)(7), reports of significant security concerns are considered SSI once TSA receives them.

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 burdens of the collection of information.

This ICR requires respondents to report information to TSA on the basis of when a particular event occurs, such as a transfer of custody or the discovery of a significant security concern, rather than a quarterly or annual reporting requirement. As such, the number of annual respondents fluctuates based on how often respondents covered by this information collection experience events that trigger a response. TSA estimates the number of annual respondents to potentially be 1,760. This is the total number of primary and alternate security coordinators for entities that may be required to submit information to TSA as a result of this information collection.

Security Coordinator Information

TSA estimates that there will be 475 annual responses to this information collection for security coordinator Information.⁶ TSA estimates that the hour burden per response will be 60 minutes (1 hour), for an annual hour burden of 475 hours.⁷ To calculate an hour burden cost to the public, TSA uses a fully-loaded⁸ hourly wage of \$92.35, for security coordinators.⁹ TSA calculates an annual hour cost burden to respondents of \$43,866. TSA calculates a three-year total hour burden cost of \$131,599. Table 1 summarizes these calculations.

Table 1: Hour Burden Cost for Security Coordinator Information

Number of Annual Responses	Hours per Response	Total Annual Hour Burden	Annual Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$92.35	E = D x 3
475	1	475	\$43,866.22	\$131,598.65

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

Location and Shipping Information Reporting Burden

TSA estimates that there will be 327 annual responses to this information collection for Location and Shipping Information Reporting.¹⁰ TSA estimates that the hour burden per response will be 30 minutes (0.5 hours) for an annual hour burden of 163.5 hours.¹¹ To calculate an annual hour burden cost, TSA uses a fully-loaded¹² wage rate of \$36.32 for dispatch officers.¹³ TSA calculates an annual hour burden cost to respondents of \$5,938.

⁶ TSA, Policy, Plans, and Engagement, Surface Division.

⁷ TSA, Policy, Plans, and Engagement, Surface Division.

⁸ A fully-loaded wage rate includes non-wage employer compensation costs, such as retirement and health benefits, among others.

⁹ The hourly wage rate for security coordinators is \$61.69. BLS. May 2020 National Industry-Specific Occupational Employment and Wage Statistics, Rail Transportation (NAICS 482000); using Transportation, Storage, and Distribution Managers (SOC 11-0000) for rail security coordinators.

http://www.bls.gov/oes/2020/may/naics3_482000.htm. Accessed May 6, 2021. This results in an un-loaded wage rate of \$61.69. For a compensation factor, TSA calculated the average total compensation (\$31.01) and the average salary and wages (\$20.72) of all quarters in 2020, and then calculated the compensation adjustment factor of 1.497 by dividing the average total compensation by the average wage and salaries (\$31.01 ÷ \$20.72). BLS. Employer Costs for Employee Compensation. Quarterly reports for March, June, September, and December 2020. Table 4: Employer Costs for Employee Compensation for Private Industry Workers, by Occupational and Industry Group. Private Industry Workers: Transportation and Material Moving. <https://www.bls.gov/bls/news-release/eccec.htm#2020>. Accessed May 6, 2021. Multiplying the unloaded wage rate (\$61.69) by the compensation factor (1.497) results in a fully-loaded wage rate of \$92.35.

¹⁰ TSA, Policy, Plans, and Engagement, Surface Division.

¹¹ TSA, Policy, Plans, and Engagement, Surface Division.

¹² See footnote 4.

¹³ The hourly wage rate for dispatch officers is \$24.26. BLS. May 2020 National Industry-Specific Occupational Employment and Wage Statistics. NAICS 482000 - Rail Transportation. Occupation Code 43-5030 Dispatchers. Last Modified March 31, 2021. Accessed 10/25/2021. https://www.bls.gov/oes/2020/May/naics3_482000.htm#13-0000. TSA calculates a compensation factor to fully load the hourly wage. TSA calculated the average total compensation (\$31.01) and the average salary and wages (\$20.72) of all quarters in 2020, and then calculated the compensation adjustment factor of 1.497 by dividing the average total compensation by the average wage and salaries (\$31.01 ÷ \$20.72). BLS. Employer Costs for Employee Compensation. Quarterly reports for March, June, September, and December 2020. Table 4: Employer Costs for Employee Compensation for Private Industry Workers, by Occupational and Industry Group. Private Industry Workers: Transportation and Material Moving. <https://www.bls.gov/bls/news-release/eccec.htm#2020>. Accessed May 6, 2021. The fully loaded wage is calculated by multiplying the hourly wage (\$24.26) by the load factor (1.497) for a fully-loaded hourly wage rate of \$36.32.

TSA calculates a three-year total hour burden cost of \$17,814. Table 2 summarizes these calculations.

Table 2: Hour Burden Cost for Location and Shipping Information

Number of Annual Responses	Hours Per Response	Total Annual Hour Burden	Annual Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$36.32	E = D x 3
327	0.5	163.5	\$5,937.87	\$17,813.60

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

Significant Security Concerns Reporting

TSA estimates that there will be 4,961 annual responses to this information collection for Significant Security Concern Reporting.¹⁴ TSA estimates that the hour burden per response will be 60 minutes (1 hours) for an annual hour burden of 4,961 hours.¹⁵ To calculate an annual hour burden cost, TSA uses a fully-loaded¹⁶ wage rate of \$36.32 for dispatch officers.¹⁷ TSA calculates an annual hour burden cost to respondents of \$180,170. TSA calculates a three-year total hour burden cost of \$540,509. Table 3 summarizes these calculations.

Table 3: Hour Burden Cost for Significant Security Concerns

Number of Annual Responses	Hours Per Response	Total Annual Hour Burden	Annual Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$36.32	E = D x 3
4,961	1	4,961.33	\$180,169.73	\$540,509.19

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

Chain of Custody Documentation

TSA estimates that there will be 214,000 annual responses to this information collection for Chain of Custody Documentation.¹⁸ TSA estimates that the hour burden per response will be 30 minutes (0.5 hours) for an annual hour burden of 107,000 hours.¹⁹ To calculate an annual hour burden cost, TSA uses a fully-loaded²⁰ wage rate of \$92.35 for security coordinators.²¹ TSA calculates an annual hour burden cost to respondents of \$9,881,443. TSA calculates a three-year total hour burden cost of \$29,644,328. Table 4 displays the hour burden cost for chain of custody documentation.

¹⁴ TSA, Office of Security Operations, Transportation Security Operations Center. The average number of security reports from FY15 (4,529), FY16 (5,210), FY17 (5,145) was 4,961.33333. More recent data was not used for this estimate due to the COVID pandemic.

¹⁵ TSA, Office of Security Operations, Transportation Security Operations Center.

¹⁶ See footnote 4.

¹⁷ See footnote 9.

¹⁸ TSA, Policy, Plans, and Engagement, Surface Division.

¹⁹ TSA, Policy, Plans, and Engagement, Surface Division.

²⁰ See footnote 4.

²¹ See footnote 5.

Table 4: Hour Burden Cost for Chain of Custody Documentation

Number of Annual Responses	Hours Per Response	Total Annual Hour Burden	Annual Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$69.88	E = D x 3
214,000	0.5	107,000	\$9,881,442.51	\$29,644,327.53

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

Total Hour and Hour Cost Burden for Respondents

TSA calculates a total hour burden and a total hour burden cost for the three-year period by summing the total hour burdens and hour burden costs from each of the four elements of this collection. TSA calculates a total annual hour burden of 112,600 hours and a total annual hour burden cost of \$10,111,416. TSA calculates a total three-year hour burden of 337,799 hours and a total three-year hour burden cost of \$30,334,249. Table 5 summarizes these calculations.

Table 5: Total Hour and Hour Cost Burden for Respondents

	Annual Hour Burden and Cost for Security Coordinator or Information	Annual Hour Burden and Cost for Location and Shipping Information	Annual Hour Burden and Cost for Significant Security Concerns	Annual Hour Burden and Cost for Chain of Custody Documentation	Total Annual Hour Burden and Cost	Total Three Year Respondent Hour Burden Cost
	A	B	C	D	E = A + B + C + D	F = E x 3
Hours	475	163.5	4,961	107,000	112,599.5	337,798.5
Costs	\$43,866.22	\$5,937.87	\$180,169.73	\$9,881,442.51	\$10,111,416.32	\$30,334,248.96

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

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

There is no additional annual cost burden to respondents or recordkeepers in excess of what is documented above. Information is typically stored electronically, and TSA assumes the marginal cost of electronic storage for this collection to be de minimis.

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.

Security Coordinator Information

For each change in security coordinator information reported to TSA, a TSA employee typically sends 20 minutes (0.33 hours) processing the information change.²² TSA estimates that there will be a total of 475 responses annually. TSA calculates the annual TSA hour burden 158 hours. The

²² TSA, Policy, Plans, and Engagement, Surface Division.

pay band of the TSA employee processing a change in security coordinator information is a G band or H band employee. TSA uses a fully loaded wage rate of \$36.00 for this pay band.²³ TSA calculates a total annual hour burden cost to TSA of \$5,687. TSA calculates the total three-year hour burden cost to be \$17,062. Table 6 summarizes these calculations.

Table 6: TSA Hour Burden Cost for Security Coordinator Information

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$36.00	E = D x 3
475	0.33	158	\$5,687.21	\$17,061.62

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

Location and Shipping Information

TSA estimates that there are 327 inspections conducted each year.²⁴ Each inspection takes 60 minutes (1 hour) but requires two inspectors.²⁵ Therefore, TSA uses an hour burden per inspection of 2 hours. TSA calculates the total TSA annual hour burden to be 654 hours. The pay bands of TSA employees conducting these inspections are G band, H band and I band. TSA uses a fully loaded wage rate of \$50.59²⁶ to estimate the annual hour burden cost to TSA. TSA estimates a total annual hour burden cost of \$33,086. TSA estimates a three-year total annual hour burden cost of \$99,258. Table 7 summarizes these calculations.

Table 7: TSA Hour Burden Cost for Location and Shipping Information

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$50.59	E = D x 3
327	2	654	\$33,085.86	\$99,257.58

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

²³ These data show all components of TSA employee compensation including benefits. This wage constitutes a fully

loaded wage rate. TSA, Office of Finance. Modular Cost Standards Data, 2021. The fully-loaded wage rate for a G band employee is \$28.78, and the fully-loaded wage rate for an H band employee is \$43.21. The wage rate used is $(\$28.78 + \$43.21) \div 2 = \$35.995$.

²⁴ TSA, Policy, Plans, and Engagement, Surface Division.

²⁵ TSA, Policy, Plans, and Engagement, Surface Division.

²⁶ The weighted average compensation for TSA STSIs estimated based on FO SMEs' distribution of pay bands for compliance inspections. TSA notes that bands will vary based on regional offices. Data was used from the DHS 2021 Modular Cost Model. The G/H pay band is \$90,186 annual compensation based on the sum of all Personnel Compensation and Benefits for GS-9/11/12 Employees. The I pay band is \$151,780 annual compensation based on the sum of all Personnel Compensation and Benefits for GS-13 Employees. Both are based on the 2021 GS wage scale for the DC metro area. These data show all components of TSA employees compensation including benefits, so it constitutes a fully-loaded rate. TSA calculated a weighted average of G/H band (\$90,186) and I band (\$151,780) fully-loaded salaries. TSA estimates that six G/H band employees and two I band employees on average will be involved in inspections. $\$105,584.50 = [(2 \times \$151,780) + (6 \times \$90,186)] \div 8$. OPM changed the 2080 work hours to 2087 by amending 5 U.S.C. 5504(b), the latter is assumed to capture year-to-year fluctuations in work hours. Source: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. Law 99-272, April 7, 1986) $\$50.59$ per hour = $\$105,584 \div 2087$.

Significant Security Concerns

TSA estimates that there are 4,961 annual reports of significant security concerns.²⁷ For each report of a significant security concern, a TSA employee must document the report and respond to the reported concern. TSA estimates the documentation and response to take an average of three hours per report.²⁸ TSA calculates the total TSA annual hour burden to be 14,883 hours. The pay bands of TSA employees responding to reports of a significant security concern are a combination of G, H, and I band. TSA uses a fully loaded wage rate of \$50.59²⁹ to estimate the annual hour burden cost to TSA. TSA estimates a total annual hour burden cost of \$752,931. TSA estimates a three-year total hour burden cost of \$2,258,793. Table 8 summarizes these calculations.

Table 8: TSA Hour Burden Cost for Significant Security Concerns

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$50.59	E = D x 3
4,961	3	14,883	\$752,930.97	\$2,258,792.91

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

Chain of Custody Documentation

TSA estimates that there are 5,199 inspections of Chain of Custody Documentation annually.³⁰ Each inspection takes three hours, however two inspectors are required. Therefore, TSA estimates the hour burden of each inspection to be six hours.³¹ TSA calculates the annual TSA hour burden to be 31,194 hours. The pay bands of TSA employees conducting the inspection are G band, H band, and I band. TSA uses a fully loaded wage rate of \$50.59³² to estimate the total annual hour burden cost to TSA. TSA estimates a total annual hour burden cost to be \$1,578,104. TSA estimates the total three-year hour cost burden to be \$4,734,313. Table 9 summarizes these calculations.

Table 9: TSA Hour Burden Cost for Chain of Custody Documentation

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total Three Year Hour Burden Cost
A	B	C = A x B	D = C x \$50.59	E = D x 3
5,199	6	31,194	\$1,578,104.46	\$4,734,313.38

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

Total TSA Hour and Cost Burden

TSA calculates a total hour burden and a total hour burden cost for the three-year period by summing the total hour burdens and hour burden costs from each of the four elements of this collection. TSA calculates a total annual hour burden of 46,889 hours and a total annual hour burden cost of \$2,369,821. TSA calculates a total three-year hour burden of 140,668 hours and a total three-year hour burden cost of \$7,109,463. Table 10 summarizes these calculations.

²⁷ TSA, Office of Security Operations, Transportation Security Operations Center.

²⁸ TSA, Office of Security Operations, Transportation Security Operations Center.

²⁹ See Footnote 23.

³⁰ TSA, Policy, Plans, and Engagement, Surface Division.

³¹ TSA, Policy, Plans, and Engagement, Surface Division.

³² See Footnote 23.

This information collection does not impact other federal agencies. Therefore, the TSA cost represents the Federal Government Cost.

Table 10: Total Hour and Hour Cost Burden for TSA

	Annual Hour Burden and Cost for Security Coordinator Information	Annual Hour Burden and Cost for Location and Shipping Information	Annual Hour Burden and Cost for Significant Security Concerns	Annual Hour Burden and Cost for Chain of Custody Documentation	Total Annual Hour Burden and Cost	Total Three Year Respondent Hour Burden Cost
	A	B	C	D	E = A + B + C + D	F = E x 3
Hours	158.33	654.00	14,883.00	31,194.00	46,889.33	140,668.00
Costs	\$5,699.70	\$33,085.86	\$752,930.97	\$1,578,104.46	\$2,369,820.99	\$7,109,462.96

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

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

The types of collections of information have not changed but the estimations of burden have changed. More regulated parties have complied with the regulation and provided information.

The following is a summary of the changes that resulted in revised estimations of burden:

- **Security Coordinator Information:** There has been a change in the estimated hourly burden for this information collection. The previously estimated hour burden was 804 hours. TSA now estimates an annual hour burden of 475. This change is due to a decrease in annual responses.
- **Location and Shipping Information:** This collection has an increase in burden. Previously, TSA estimated an annual hour burden of 165. TSA now estimates an annual hour burden of 327. This change is due to an increase in annual responses. The amount of time per response remains the same.
- **Significant Security Concerns Information:** This collection has a slight decrease in the annual hour burden. Previously, TSA estimated an annual hour burden of 5,475 hours. TSA now estimates that there is an annual hour burden of 4,961 hours, a decrease of 514 hours. This change is due to TSA now estimating a per-response hour burden.
- **Chain of Custody and Control Documentation:** Previously, TSA estimated an annual hour burden of 39,000 hours. TSA now estimates an annual hour burden of 107,000 hours. This increase in the annual hour burden is due to a large increase in the number of annual responses. TSA has improved data fidelity, and bases its estimate of the number of annual responses on actual data from the Rail Asset Integrated Logistics System (RAILS) Dashboard, which is a tool TSA uses to collect data for non-regulatory activities.

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.

None of this information will be published.

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 approval to not display the expiration date for OMB approval of the information collection.

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

There are no exceptions.