

## **INFORMATION COLLECTION SUPPORTING STATEMENT**

### **TRANSPORTATION SECURITY ADMINISTRATION, END OF COURSE LEVEL 1 EVALUATION – INSTRUCTOR-LED CLASSROOM TRAINING OMB control number 1652-0041 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.)**

Consistent with requirements in the Government Performance and Results Act of 1993 (GPRA) (Pub. L. 103-62; 107 Stat. 285, Aug. 3, 1993), the TSA Canine Training Center (CTC) evaluates the instruction it delivers, through a range of courses, to train canines and their handlers. These handlers are primarily TSA personnel and State and local civilian personnel working for law enforcement agencies that are responsible for the security at airports throughout the United States. These agencies participate in this classroom training under agency-specific cooperative agreements with TSA's National Explosives Detection Canine Team Program. The courses include the CTC Explosives Detection Canine Handler Course, Passenger Screening Canine Handler Course, Bridge Course, Canine Training Instructor Course, and the Security Operations Canine Management Course. The information obtained from TSA Form 1904A, End of Course Level 1 Evaluation – Instructor-Led Classroom Training, which is provided to students following course completion, provides valuable feedback about the extent to which TSA personnel and State and local civilian personnel ("TSA students") are satisfied with their learning experience, and is used to improve the course curriculum and course of instruction. Evaluating and improving the effectiveness and efficiency of instructional programs supports agency requirements, as dictated by GPRA, to improve government performance management.

- 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.**

This information collection captures ratings and written comments from students about the quality of the training. The CTC collects the evaluation data to determine students' satisfaction with their learning experience and provides it to representatives at both TSA headquarters and at CTC (e.g., to the Branch Manager, Deputy Branch Manager, and CTC instructional staff and supervisors) to improve the course curriculum and course of instruction. Level 1 evaluations are standardized at TSA. Standardization allows comparison of courses to a single, TSA-average score, as well as comparison of other courses' average scores.

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.]***

The information is collected electronically. In compliance with the Government Paperwork Elimination Act, all TSA students, to include civilian CTC students, submit ratings and written comments electronically through a secure internal network drive accessible only by authorized personnel. See 42 USC 3504.

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.***

Obtaining information from attendees, for the sole purpose of improving course instruction and curriculums, is the goal of the collection. The form provides a direct and efficient way to collect feedback. This information is not available through any other source.

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.***

This information is collected from students to provide constructive feedback about their experience. Each student who successfully completes the training has the opportunity to provide as much or as little feedback as he or she deems necessary. The collection of this data enables TSA to perform an analysis to determine how well the training objectives are being met in an effort to ensure proper fulfillment of the TSA mission. This information enables TSA to update, improve, and tailor the training, curriculum, and instructor interaction for optimal education and high quality instruction. Training development personnel compile the collected data into quarterly assessments of the overall quality of the training environment. If this collection were not conducted, TSA would be limited in its ability to perform the analysis mentioned above, which relies on TSA's ability to qualitatively evaluate training effectiveness.

- 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 collection will be conducted 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 a notice in the *Federal Register*, with a 60-day period for soliciting comment, see 86 FR 63049 (November 15, 2021), and a 30-day notice, on April 20, 2022 (see 87 FR 23531). TSA received no comments in reply to the notices.

- 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 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 an assurance of confidentiality. However, when a student submits the completed form, the data writes to an internal, secure hard drive with an identification number completely disconnected from the individual's identity. No one will be able to connect any one form to an individual student. No Privacy Information Act or System of Records Notice coverage is necessary for this information collection.

- 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 or private nature on the End of Course Level 1 Evaluation–Instructor-Led Classroom Training form.

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

TSA estimates that on average, 156 students will participate in this collection on an annual basis. TSA estimates that it would take approximately 30 minutes (0.5 hours) to participate, resulting in an estimated average annual burden of 78 hours (156 students x 0.5 hours).

The cost burden is calculated by multiplying the hours by the average hourly wage rate of the participants. The national average fully loaded hourly wage for Police and Sheriff's Patrol Officers is \$54.51.<sup>1</sup>

TSA multiplies this total average annual hour burden (78 hours) by a fully loaded wage rate of \$54.51 to estimate an average annual hour burden cost of \$4,252). TSA estimates the three-year total hour burden cost of \$12,756 \$.

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

There is no cost burden to respondents for this collection of information.

**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 rates of \$72.73<sup>2</sup>, \$85.80<sup>3</sup>, and \$100.79<sup>4</sup>, to estimate TSA employees' cost to either compile the data for management review or to review the entire accumulated package.

TSA estimates that the annual hour burden cost to the Federal Government as a result of this ICR is approximately \$59,240. This estimate, calculated using loaded hourly rates, is based on seven Federal employees. Table 1 shows the total annual hour burden cost estimate for TSA.

**Table 1: TSA Total Hour Burden Cost**

<sup>1</sup> TSA uses the average hourly wage of \$33.66 for Police and Sheriff Officers. BLS, May 2020 Occupational Employment and Wages. Police and Sheriff's Patrol Officers (33-3051). Last Modified Data: March 31, 2021. <https://www.bls.gov/oes/2020/may/oes333051.htm>. Retrieved October 28, 2021. TSA uses the compensation factor for State and local government workers. For all State and local government workers, hourly total compensation is \$53.59 and hourly wages and salaries are \$33.09. TSA estimates the compensation factor as 1.61952 ( $\$53.59 \div \$33.09$ ). BLS, News Release, Employer Costs for Employee Compensation – June 2021. Table 4. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: state and local government workers, by occupational and industry group, June 2021. Release date September 16, 2021. [https://www.bls.gov/news.release/archives/ecec\\_09162021.htm](https://www.bls.gov/news.release/archives/ecec_09162021.htm). Retrieved October 28, 2021. TSA estimates that the fully loaded average hourly wage rate is \$54.51 ( $\$33.66 \times 1.61952$ ).

<sup>2</sup> The total compensation for I Band (equivalent to GS –13) TSA personnel is \$151,780 per year (including locality adjustment and other benefits). Source: Modular Cost Standards FY21, TSA Financial Management Division (MCS).  $\$72.73 = \$151,780 \div 2,087$  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) (1985 Omnibus Budget).

<sup>3</sup> The total compensation for J Band (equivalent to GS –14) TSA personnel is \$179,062 per year (including locality adjustment and other benefits). Source: MCS.  $\$85.80 = \$179,062 \div 2,087$  annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: 1985 Omnibus Budget).

<sup>4</sup> The total compensation for K Band (equivalent to GS –15) TSA personnel is \$210,344 per year (including locality adjustment and other benefits). Source: MCS.  $\$100.79 = \$210,344 \div 2,087$  annual work hours. TSA divided the annual salary by 2,087 to get the average hourly wage. Source for 2,087 hours per year: 1985 Omnibus Budget).

<b>Position and TSA Pay Band</b>	<b>Loaded Hourly Wage Rate (Band)</b>	<b>Hours to Review</b>	<b>Number of Reviewers</b>	<b>Number of Reviews Annually</b>	<b>Annual Cost to Review</b>
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E = A × B × C × D</b>
Supervisory Agent in Charge - K	\$100.79	1	2	79	\$15,924.46
Supervisor - J	\$85.80	1	3	79	\$20,334.30
Trainer Development - I	\$72.73	2	2	79	\$22,981.54
<b>Total Government Cost of Review per year</b>					<b>\$59,240.31</b>

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

TSA estimates the three-year total burden to be \$177,721 (\$59,240 x 3 years).

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

There are no program changes or adjustments to this collection. However, since the 2019 renewal of this Information Collection Request, the number of respondents have increased from 79 to 156 annually.

**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 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 is not seeking such approval.

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

TSA is not seeking any exceptions to the certification statement.