INFORMATION COLLECTION SUPPORTING STATEMENT

Enhanced Security Procedures at Ronald Reagan Washington National Airport (DCA)
OMB control number 1652-0035
Expiration 11/30/2022

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).***

On December 12, 2003, Congress enacted the Vision 100-Century of Aviation Reauthorization Act (Public Law 108-176, 117 Stat. 2489) (Vision 100). Section 823 of Vision 100 (117 Stat. 2595), which was codified as a note to 49 U.S.C. 41718, required the Secretary of Homeland Security to develop a security plan to permit general aviation (GA) aircraft to resume operations into and out of Ronald Reagan Washington National Airport (DCA). The Transportation Security Administration (TSA) issued an interim final rule (IFR) implementing these requirements in 2005. *See* 70 FR 41586 (July 19, 2005).

To operate flights into and out of DCA, GA aircraft operators must apply to the Federal Aviation Administration (FAA) for a reservation and must submit a flight authorization request to the TSA Airspace Waiver Office. The information collection relevant to the flight authorization request is approved under OMB control number 1652-0033, TSA Airspace Waiver Applications.

These GA aircraft operators must also designate a security coordinator and adopt a DCA Access Standard Security Program (DASSP). As part of the DASSP, GA aircraft operators must ensure all flight crewmembers, armed security officers (ASOs), and security coordinators have undergone a fingerprint-based criminal history records check (CHRC).

To receive TSA authorization for a flight, GA aircraft operators must ensure that name-based security threat assessments (STAs) are conducted by TSA on their crewmembers and passengers, including ASOs who are required to be onboard. Each ASO also must complete specialized training and receive authorization from TSA. The last point of departure for approved flights into DCA must be from a Fixed Base Operator (FBO)[1] at an airport that holds a security program approved by TSA (gateway airport). At each gateway airport, TSA inspects the aircraft and screens the passengers, their carry-on property, and property carried in the cargo hold of the aircraft, before it departs for DCA. The aircraft operator must also comply with all applicable FAA rules.

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[1] An FBO is an airport-based commercial enterprise that provides support services to aircraft operators, such as maintenance, overnight parking, fueling, and de-icing.

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.

TSA requires the following information for the designation of the GA aircraft operator Security Coordinator: name; full company name; address; corporate flight department location; flight department mailing address; airport used as base of operation; statement asking if the aircraft operator presently complies with a TSA Standard Security Program and indication of which program; and full name, title, phone and email of primary and alternate security coordinator. TSA uses this information to identify the individual(s) designated as a security coordinator and to ensure GA operators adopt a DASSP.

TSA also requires the following individuals to submit fingerprints and other identifying information for a name-based STA: individuals designated as security coordinators by FBOs and GA aircraft operators; flight crewmembers who operate GA aircraft into and out of DCA in accordance with the IFR and DASSP; and ASOs approved in accordance with the IFR. In addition to fingerprints, these individuals also are required to submit the following information: (1) legal name, including first, middle, and last, any applicable suffix, and any other names used; (2) current mailing address, including residential address if different than current mailing address; (3) date and place of birth; (4) social security number (submission is voluntary although recommended); (5) citizenship status and date of naturalization if the individual is a naturalized citizen of the United States; and (6) alien registration number, if applicable. In addition to providing fingerprints and identifying information, ASOs must also provide personal history information (employment, criminal, education, training, military, medical, and law enforcement experience), as well as a photograph and weapon information. For ASOs, TSA will also conduct an employment history verification check. TSA uses this information to perform a CHRC and an STA to assess whether the individuals pose a security threat. For flight crewmembers, TSA also uses this information to check their FAA records to determine whether they have a record of violation of specified FAA regulations. As part of the threat assessment process, TSA shares the information with the Federal Bureau of Investigation and the FAA.

GA aircraft operators are required to provide TSA with the following identifying information for all individuals, including passengers, onboard each aircraft that operates into and out of DCA: (1) legal name, including first, middle, and last, any applicable suffix, and any other names used; (2) date and place of birth; (3) social security number (submission is voluntary, although recommended); (4) current mailing address, including residential address if different than current mailing address; (5) citizenship status and date of naturalization if the individual is a naturalized citizen of the United states; and (6) alien registration number if applicable.

GA aircraft operators also are required to provide TSA with the flight plan and registration number of their aircraft that will operate to or from DCA. TSA shares this information with the FAA for purposes of tracking and identifying approved aircraft.

Aircraft operators and FBOs participating in this program can nominate the individuals they would like to be qualified as ASOs by submitting an ASO nomination form to TSA. Once nominated, the ASOs are required to submit information set forth above, as well as employment history information. TSA uses the applicants' information to conduct a

fingerprint-based CHRC and STA. All qualified applicants must then successfully complete a TSA-approved training course.

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, aircraft operators can email completed DASSP and FBO applications to DASSP@tsa.dhs.gov or fax them to (703) 603-4030, where they will be processed electronically. The ASO application nomination form can be completed online at https://www.tsa.gov/contact-center/form/armed-security-officer-nomination.

In addition, a majority of the ASO application materials are electronically formatted, in Adobe Portable Document Format, with the ability to digitally sign and submit via email to the ASO program office at asoprogram@tsa.dhs.gov. They include: TSA Form 3411, Armed Security Officer Voluntary Questionnaire (currently being processed to become an electronic form); TSA Form 3412, Armed Security Officer Authorization for Release of Information; TSA Form 3413, Armed Security Officer Lautenberg Certification; TSA Form 3414, Armed Security Officer Assumption of Risk and Waiver of Responsibility; TSA Form 3415, Armed Security Officer Training Acknowledgement; and TSA Form 3416, Armed Security Officer Candidate Signature.

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.*

TSA is the only agency that collects this information to conduct an STA for purposes of GA flights into and out of DCA. Because information from GA pilots, flight crewmembers and passengers, including ASOs, is only collected when GA aircraft operators apply and operate into and out of DCA under a DASSP, this information is not collected or maintained elsewhere.

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.*

Any burden imposed on small business or other small entities resulting from the time limits necessary to collect the required information and complete an application (which includes information on individual flight crewmembers, ASOs and passengers) is necessary to enhance aviation and national security, while facilitating GA aircraft operations at DCA. As mentioned above, TSA has implemented a program to collect all applications electronically, in an effort to reduce the time burden on respondents. A hard copy application and manual application process is available for those respondents with limited access to the Internet.

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

Without the information needed to complete STAs, TSA would be unable to process requests for flights into and out of DCA, which would have a negative impact on the GA community. If the required information is not collected, TSA will not be able to conduct fingerprint-based STAs on flight crewmembers, security coordinators and ASOs and name-based STAs on passengers and flight crewmembers onboard GA aircraft operating into or out of DCA. Conducting STAs on these individuals is essential to protect against threats to aviation and national security and the valuable assets in the National Capital Region.

Further, if TSA does not collect the required information from ASO applicants, TSA will not be able to identify qualified individuals to serve as ASOs onboard GA aircraft operating into or out of DCA. Consequently, aircraft operators would not be able to operate in or out of DCA because they could not implement one of the critical security measures required under the regulation.

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

This information collection is conducted in a manner consistent with the general information guidelines.

8. ***Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> 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 and a 30-day notice, as required by 5 CFR 1320.8(d), in the *Federal Register* soliciting comment for purposes of renewing OMB's approval of this information collection. *See* 87 FR 9080 (February 17, 2022) and 87 FR 31571 (May 24, 2022). TSA has not received any comments in response 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.*

The confidentiality and privacy of this information will be maintained in accordance with the Privacy Act of 1974. The ASO forms include a Privacy Act Statement citing 49 U.S.C. 114. The applicable System of Records Notice for the ASO collection is DHS/TSA-002, Transportation Security Threat Assessment System. *See* 79 FR 46862 (August 11, 2014). On September 20, 2005, the Department of Homeland Security published the Privacy Impact Assessment, DHS/TSA/PIA-003 - Airspace Waiver and Flight for Certain Aviation Operations (Including DCA) on www.dhs.gov.

11. *Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.*

TSA does not ask any questions of a sensitive nature.

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

TSA estimates that approximately 76 aircraft operators will apply for access to DCA annually and thus be required to respond to the information collection requirements. Aircraft operators are required to submit information on the security coordinators, flight crewmembers, and passengers. TSA estimates it takes 1 hour to complete and submit a DASSP application, for an annual hour burden of 76 hours (228 over three years). TSA uses a fully-loaded wage rate[2] of $99.62[3] to estimate an annual hour burden cost of $ 7,571 ($22,713 over three years). Table 1 summarizes this calculation.

Table 1: Public Hour Burden and Hour Burden Costs for DASSP Applications

Number of Annual DASSP Applications	Hour Burden per DASSP Application	Total Annual Hour Burden	Total Annual Hour Burden Costs
A	B	C = A x B	D = C x $99.62
76	1	76	$7,571.12

ASO nomination packets are processed separately. TSA processes an average of 84 ASO packets annually. TSA estimates it takes 70 minutes (1.1667 hours) to complete and submit an ASO packet, for an annual hour burden of 98 hours (294 over three years). TSA uses a

[2] A fully-loaded wage rate includes non-salary costs to the employer for employee compensation, such as health and retirement benefits.

[3] The unloaded wage rate for General Managers is $66.22. BLS. May 2020 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481200 - Nonscheduled Air Transportation. OCC 11-1021 General and Operations Managers. Last modified March 31, 2021 (accessed November 9, 2021), https://www.bls.gov/oes/2020/May/naics3_481000.htm. To estimate a fully-loaded wage rate, TSA calculates a compensation factor by dividing the total compensation ($32.63) by the salary component of compensation ($21.69). The compensation factor is 1. 5043799. BLS. Employer Costs for Employee Compensation - June 2021. Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers. Production, transportation and material moving occupations. Last modified September 16, 2021 (accessed November 9, 2021), https://www.bls.gov/news.release/archives/ecec_09162021.htm. The fully-loaded wage rate is the result of multiplying the unloaded wage rate and the compensation factor: $99.62 = $66.22 x 1.5043799.

fully-loaded wage rate of $99.62[4] to estimate an annual hour burden cost of $9,763 ($29,288 over three years). Table 2 summarizes this calculation.

Table 2: Public Hour Burden and Costs for ASO Collection

Number of Annual ASO Packets	Hour Burden per ASO Packet	Total Annual Hour Burden	Total Annual Hour Burden Costs
A	B	C = A x B	D = C x $99.62
84	1.1667	98	$9,762.76

TSA sums the hour burden and hour burden costs for the DASSP applications and ASO nomination packets to calculate the total annual hour burden and hour burden costs for this collection. The total annual hour burden is 174 hours (522 over three years) and the total annual hour burden cost is $17,334 ($52,002 over three years). Table 3 summarizes this calculation.

Table 3: Total Hour Burden and Hour Burden Cost

	DASSP Applications	ASO Packets	Total
Hour Burden	76	98	**174**
Hour Burden Costs	$7,571.12	$9,762.76	$17,333.89

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

TSA estimates that security coordinators, ASOs, and flight crewmembers will complete a CHRC for purposes of this ICR, as well as a STA. TSA charges a fee of $15 for each STA. In addition, TSA charges an ASO training fee of $490 per ASO. There is a screening fee of $148 per aircraft per flight leg.[5] Table 4 breaks-out estimated STAs by respondent category and summarizes the costs.

Table 4: DASSP and ASO Application Fees

Type of STA	Number of Annual Responses	Fee per Response	Annual STA Fee Burden
	A	B	C = A x B
Security Coordinator	76		$1,140
Flight crew	152	$15.00	$2,280
ASO STA	84		$1,260
LE ASO Training Fee	84	$490.00	$41,160
Total			$45,840

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[4] *Id*.

[5] TSA assumes 2 legs per flight to account for arrival and departure; therefore, the fee is $296 per aircraft.

TSA charges additional fees on GA aircraft that fall under the DASSP program. All individuals aboard the aircraft, including passengers, are subject to an STA and are charged an STA fee of $15. TSA also imposes a screening fee of $296 per aircraft, and estimates there will be 390 flights annually.[6] Table 5 summarizes these calculations.

Table 5: DASSP Flights Fees

Type of STA	Number Screened	Fee per Response	Annual STA Fee Burden
	A	B	C = A x B
Aircraft Screening Fee	390	$296	$115,440.00
Passenger STA Fee	1,560		$23,400.00
Flight Crew STA Fee	780	$15	$11,700.00
Total			$150,540.00

The total fees collected for the DASSP program is estimated to be $45,840 + $150,540 = $196,380 annually, or $589,140 over 3 years.

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 employees process both DASSP applications and ASO nomination packets. Each DASSP application takes a TSA employee approximately 8 hours to process, resulting in an annual hour burden to TSA of 608 hours. Employees responsible for processing DAASP applications are I-Band employees with a fully-loaded hourly wage of $72.73 and J-Band employees with a fully-loaded hourly wage of $85.80[7], for an annual hour cost burden of $52,166 to TSA. TSA estimates it takes 70 minutes (1.1667 hours) to process an ASO packet, for an annual hour burden of 98 to TSA. Employees responsible for processing ASO packets are a mix of I-Band and J-Band employees with a fully-loaded hourly wage rate of $73.38,[8] for an annual hour burden cost of $7,191. The total annual hour burden for TSA is 706 (2,118 over three years) and the total annual hour burden cost is $59,358 ($178,074 over three years). Table 6 summarizes these calculations.

Table 6: TSA Hour Burden and Hour Burden Costs

Collection Activity	Number of Responses	Hour Burden per Response	Annual Hour Burden	Hourly Wage Rate	Annual Hour Burden Cost
	A	B	C = A x B	D	E = C x D
DASSP Application	76	8	608	$85.80	$52,166.40
ASO Packet	84	1.1667	98	$73.38	$7,191.24
Total	**160**		**706**		**$59,358**

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[6] The fee is $148 per aircraft per flight leg, or $296 total for an arrival and a departure. There was an average of 390 DASSP flights in CY 2020-2021.

[7] TSA, Finance and Administration, FY2021 Modular Cost Data.

[8] The mix is 95 percent I-Band and 5 percent J-Band employees: $73.38 = (0.95 x $72.73) + (0.05 x $85.80).

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

No program changes or adjustments have been made. However, TSA has updated the response to question 13 to show a more accurate representation of the fees for the respondents. In the 2019 ICR, TSA included the fees for the DASSP Application STAs. However, it did not include the ongoing fees for the ASO applications and the DASSP flight fees as provided above in the response to question 13. In addition, TSA provided the incorrect STA applicant fee of $64.60 instead of the correct fee amount of $15. As such, the correct amount of ongoing fees is actually $196,380 annually instead of the amount of $20,124 as shown in the 2019 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.

TSA will not publish the results of this information 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 will display the expiration date as required.

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 exception to the certification statement in Item 19.