

INFORMATION COLLECTION SUPPORTING STATEMENT

Transportation Security Officer (TSO) Medical Questionnaire

OMB No. 1652-0032

Exp. 7/31/2023

- 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 Transportation Security Administration (TSA) is requesting approval to renew this collection of information to comply with section 111 of the Aviation and Transportation Security Act (ATSA), Pub. L. 107-71 (115 Stat. 597; Nov. 19, 2001), as codified at 49 U.S.C. 44935, which requires TSA to establish qualification standards for the employment of security screening personnel. With approval from the Office of Management and Budget (OMB), TSA currently collects information necessary to validate that qualification standards are met through the Transportation Security Officer (TSO) medical questionnaire. See ICR Reference No. 201904-1652-001 (July 14, 2020).

- 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 collection of information assists the agency in meeting its statutory obligation to ensure that no individual serves as a TSO who does not “possess basic aptitudes and physical abilities, including color perception, visual and aural acuity, physical coordination, and motor skills.” See 49 U.S.C. 44935(f)(1)(B). The Security Officer Medical Questionnaire (SOMQ) enables TSA to collect the information necessary to assist health care providers in making determinations regarding candidates’ medical and physical abilities to successfully perform the job without being overly intrusive. The scope of this determination provides a candidate’s current and past medical history, including visual and aural acuity, physical coordination, and motor skills to be able to: (a) distinguish on screening equipment monitors the appropriate imaging standard; (b) distinguish each color displayed on every type of screening equipment and explain what each color signifies; (c) hear and respond to the spoken voice and to audible alarms in an active checkpoint environment; (d) perform physical searches by efficiently and thoroughly manipulating and handling baggage containers, and other objects; (e) perform pat-downs or hand-held metal detector searches of individuals with sufficient dexterity and capacity to thoroughly conduct the procedures over an individual’s entire body; and (f) demonstrate a daily fitness for duty without impairment due to illegal drugs, sleep deprivation, medication, or alcohol.

A TSA contractor facilitates receipt and processing of all medical forms.

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.]***

Consistent with the GPEA, TSA routinely considers technology to reduce the burden of this collection. As such, TSA successfully moved from a manual system and now partially collects this information electronically by providing an electronic version of the SOMQ. Candidates are able to access the SOMQ via an electronic portal and complete the form electronically. While the form can be completed on the electronic portal, a copy must be printed and brought to the TSA-contracted health care provider. The provider then reviews the SOMQ along with the candidate and enters comments on the printed SOMQ. TSA is currently working to make the entire information collection process electronic, end-to-end. This effort requires identifying a vendor that can effectuate the electronic submission to the health care providers. Until the electronic submission can be deployed, the submission to the health care providers must continue to be conducted manually using the printed form.

Usability Testing Requirement: TSA completed a usability study on the SOMQ. The purpose for the study was to determine the ease of use of three sections of the form, Demographic (page 1), General Information (pages 1-2), and Cardiovascular (pages 3-4). The study included 4 Transportation Security Officers (users), where one previously completed the form in 2002 and three in 2022. None were active candidates. All the users completed the SOMQ in PDF format and not through the above referenced electronic portal. TSA observed that the users were easily able to sign the form and initial each page per the form instructions, indicating that the instructions were clear and the form functionality worked as intended. None of the users expressed any major concerns and navigated the form easily; and all the users expressed confidence in utilizing the SOMQ's instructions without assistance. The users reported that the SOMQ was easy to read and to follow instructions. They also reported that the questions had a good flow in terms of the content/context of what was being asked. However, some of the users thought the form would be more user friendly if completed entirely electronically (i.e., not via PDF). More specifically they recommended that an electronic option would allow for easier editing of responses, lining up "X's" in the selection boxes and printing the SOMQ. The users also recommended that an information icon on medical terms would be helpful as they were not familiar with some of the medical conditions/terms. TSA has already implemented the form electronically via the aforementioned portal to address the expressed concerns. In terms of adding the medical terms information link, TSA considers this as valuable feedback and is looking at adding medical terms links to the SOMQ in the future. Currently, TSA provides a link to medical guidelines, https://jobs.tsa.gov/Resources/TSO_Medical_Guidelines.pdf.

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.***

The SOMQ form has proven to be the most effective and appropriate method for collecting the information necessary to assist the health care providers in making determinations regarding candidates' medical and physical abilities to successfully perform the job without being overly intrusive.

- 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 collection of information does not have a significant impact on a substantial number of small businesses or other small entities. As described above, the medical questionnaire information is collected from candidates under employment consideration for TSO positions.

- 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.***

The determination that TSO candidates successfully meet the qualification requirements described above is essential to create and maintain a national workforce of skilled and medically qualified employees charged with protecting the Nation's transportation systems by ensuring the freedom of movement for people and commerce. The security of the Nation's transportation systems would be severely compromised if this collection is not conducted or is conducted less frequently.

- 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).***

There are no 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).

- 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 invited public comment on this information collection requirement, a 60-day notice was published in the *Federal Register* on January 30, 2023 (88 FR 5903), and a 30-day notice was published on May 2, 2023 (88 FR 27524). TSA received an inquiry on the 60-day notice, asking whether there were any proposed changes to the collection or if the collection would be an extension.

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.

TSA will maintain the information according to the Privacy Act, OPM/GOVT-10 System, Employee Medical File of Records of TSO candidates who are hired, or under the OPM/GOVT-5, Recruiting, Examining, and Placement System of Records of TSO candidates who are not hired. TSA will maintain the information in a secured area with access limited to authorized personnel who have a business need to know the information. The collection is also covered by SORN – DHS/TSA-022, which reflects TSA’s move from its legacy payroll and personnel system to become a payroll customer of the USDA’s National Finance Center. DHS published a Privacy Impact Assessment for the HRAccess Program on July 28, 2009.

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.

While some of the questions TSA is posing could be considered to be of a private, sensitive nature, TSA deems this collection necessary to evaluate a candidate’s medical suitability for the TSO job. Consistent with the requirements in 49 U.S.C. 44935, this collection is essential to ensure that individuals performing TSA’s security mission are physically able to perform their duties safely, with minimal risk of injury to themselves or others, and in a manner that does not compromise security. As noted above, TSA will follow appropriate procedures to protect this information from unauthorized disclosure.

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

TSA uses the SOMQ to collect the information necessary to assist the health care providers in making determinations regarding the medical and physical abilities of applicants for the position of TSO to successfully perform the job. The hour and cost burden calculations depend on all applicants for a TSO position completing the required SOMQ.

TSA estimates that the average annual number of respondents to this information collection process is approximately 22,500. TSA estimates that the medical screening required to evaluate a candidate and complete the SOMQ is 45 minutes (0.75 hours), resulting in an annual hour burden of 16,875 hours. In addition, applicants to the TSO position are required to travel to a TSA-contracted medical services provider in order to receive the necessary medical screening.¹ TSA estimates round-trip travel time to the TSA-contracted medical services provider to be 54 minutes (0.9 hours), resulting in an annual hour travel burden of 20,250 hours. The total annual hour burden of this collection is 37,125 hours (111,375 hours over three years). As TSO applicants can be any member of the public, TSA uses a fully-loaded² wage rate of \$40.90.³ TSA estimates a total annual hour burden cost of \$1,518,413. Table 1 summarizes these calculations.

¹ The costs for the TSA-contracted medical services providers are calculated in Item 14.

Table 1. Hour Burden and Costs for TSO Medical Questionnaire

Activity	Number of TSO Medical Screenings	Hour Burden	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$40.90
Medical Screening	22,500	0.75	16,875	\$690,188
Travel to Doctor's Office		0.90	20,250	\$828,225
Total	22,500		37,125	\$1,518,413

Note: Totals may not add due to rounding.

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

TSA estimates no costs in addition to the hour burdens discussed above for this information collection.

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.

Based on the data provided by TSA Office of Chief Medical Officer and CHS, TSA estimates that the total annual cost incurred by the Federal Government is \$3,488,850.

Calculations:

The cost TSA incurs due to this information collection has five cost components. The first cost component is the medical evaluation of the TSO applicant by a TSA-contracted medical provider. TSA estimates this takes 45 minutes (0.75 hours), and applies a contracted wage rate of \$150 per hour for this event for 22,500 applicants per year. The total cost for this is (a) = $\$150 \times .75 \times 22,500 = \$2,531,250$ per year.

The second cost component is the time the TSA-contracted medical provider spends after the examination comparing notes from the examination with the SOMQ that the applicant completed. TSA estimates this takes 10 minutes (0.167 hours) per examination. The total cost for this component is (b) = $\$150 \times .167 \times 22,500 = \$562,500$ per year.

The third cost component is the assessment of the SOMQ by a team of medical personnel after the SOMQ is submitted by the medical provider to TSA. TSA estimates that the assessment team takes 5 minutes (0.083 hours) each to review and process the SOMQ. TSA also estimates that the fully loaded average hourly wage rate for a medical professional involved in the assessment of the SOMQ is \$90. The total cost for this component is (c) = $\$90 \times .083 \times 22,500 = \$168,750$ per year.

² A fully loaded wage rate accounts for non-compensation costs of employment, such as health and retirement benefits.

³ BLS. Employer Costs for Employee Compensation - March 2022. Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers. All Workers. Last modified June 16, 2022 (accessed August 9, 2022). https://www.bls.gov/news.release/archives/ecec_06162022.htm.

The fourth and fifth cost components are shipping and storage costs. TSA estimates that the shipping cost of the SOMQ from the TSA-contracted medical providers to the review location and then to a storage facility is \$9.50 per package. In addition, the storage cost associated with the SOMQ is \$0.56 per TSO candidate.

(d) Shipping of SOMQ

Government cost = 22,500 packages x \$9.50 per package = \$213,750 per year

(e) Storage of SOMQ

Government cost = 22,500 candidates x \$0.56 per candidate = \$12,600 per year

Total annual government cost = \$3,488,850 (sum of (a) to (e)).

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

The time burdens and costs for TSA-contracted medical providers have been added to Item 14 to more accurately reflect the costs of this program.

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 information collected.

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 and will 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.

TSA is not seeking any exceptions to the certification statement identified in Item 19, OMB Form 83-I, Certification for Paperwork Reduction Act Submissions.