# Supporting Statement General Declaration 1651-0002

#### A. Justification:

 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.

CBP Form 7507, *General Declaration*, must be filed for all aircraft required to enter or depart under the provisions of 19 CFR 122.41 or 122.61. This form is used to document entrance and clearance for arriving and departing aircraft at the required inspection facilities and inspections by appropriate regulatory agency staffs. Flight identifying information, including the aircraft registration number, which is not collected elsewhere by CBP, and a declaration attesting to the accuracy, completeness and truthfulness of all other documents that make up the manifest shall be submitted on the CBP Form 7507 for aircraft entering or departing the United States, with certain exceptions.

### **New Change:**

To reduce paperwork and reduce duplication of information, the CBP Form 7507 is being streamlined, and will no longer require respondents to provide passenger and crew information, a declaration of health for the persons on board, and details about disinfecting and sanitizing treatments during the flight.

The General Declaration (CBP Form 7507) will now only contain:

- 1. Flight identifying information.
- 2. The aircraft registration number (if not otherwise collected or received by CBP).
- 3. A declaration attesting to the accuracy, completeness, and truthfulness of all other documents that make up the manifest.

CBP Form 7507 is authorized by 19 U.S.C. 1431, 1433, and 1644a; and provided for by 19 CFR 122.43, 122.52, 122.54, 122.73, and 122.144. This form is accessible at https://www.cbp.gov/newsroom/publications/forms.

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.

CBP Form 7507 is used by CBP as a declaration attesting to the accuracy,

completeness and truthfulness of all other documents that make up the manifest.

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.

CBP is currently in the process of developing a system to automate the CBP Form 7507. Currently this form is a fillable form at: https://www.cbp.gov/newsroom/publications/forms

CBP conducted usability testing on the new draft form for General Declaration, testing was completed with representatives of Air Canada and Delta Airlines. The representatives had no problem with completing the form but felt that instructions to clarify what was required for each field would be helpful. Instructions have been added to the draft form and once formally approved with be the new General Declaration Form.

CBP management regularly meets with the Airlines for America (A4A). The changes to the general declaration have been discussed in detail and CBP has taken their feedback into account for the development of the new form.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

CBP has worked with the CDC and reviewed changes to CDC regulations and public health information is no longer required. In addition, other fields have been removed that are duplicative of Advance Passenger Information System (APIS) electronic manifest information. Only field that identify the flight and link the flight information with the aircraft registration number and the declaration attesting to the accuracy and completeness and truthfulness of all other documents that make up the manifest remain. This information is not received by CBP through other means.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not involve small businesses.

6. Describe consequences 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 were collected less frequently, CBP would not be able to enforce regulatory requirements.

# 7. Explain any special circumstances

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(c)(2).

8. 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.

Public comments were solicited through two Federal Register notices. A 60-day notice published on March 03, 2023 (88 FR 13455) on which no comments were received, and a 30-day notice published on July 31, 2023 (88 FR 49476) on which no comments have been received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no offer of a monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no PII associated with this information collection. No assurances of confidentiality are provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a personal or sensitive nature.

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

TOTAL NO. OF	
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FORM	BURDEN HOURS	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	TIME PER RESPONSE
7507	44,023	500	2,644	1,322,000	2 minutes (.0333 hours)

#### **Public Cost**

The estimated cost to the respondents is \$4,437,959. This is based on the estimated burden hours (44,023) multiplied by the average loaded hourly wage rate for aircraft pilots (\$100.81). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2021 median hourly wage rate for Aircraft Pilots and Flight Engineers (\$64.73), which CBP assumes best represents the wage for aircraft pilots, by the ratio of BLS' average 2021 total compensation to wages and salaries for Transportation and Material Moving occupations (1.4953), the assumed occupational group for brokers, to account for non-salary employee benefits.¹ CBP assumes an annual growth rate of 4.15% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.

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

There are no recordkeeping, capitalization or start-up costs associated with this collection.

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annual cost to the Federal Government associated with the review of

<sup>1</sup> Because median hourly wage information was not available for Aircraft Pilots and Flight Engineers CBP adjusted the annual median wage for Aircraft Pilots and Flight Engineers (\$134,630) to an hourly estimate using the standard 2,080 hours worked per year. Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2021 National Occupational Employment and Wage Estimates United States." Updated March 31, 2022. Available at https://www.bls.gov/oes/current/oes\_nat.htm. Accessed May 25, 2022. The total compensation to wages and salaries ratio is equal to the calculated average of the 2021 quarterly estimates (shown under Q01, Q02, Q03, Q04) of the total compensation cost per hour worked for Transportation and Material Moving occupations (\$32.7725) divided by the calculated average of the 2021 quarterly estimates (shown under Q01, Q02, Q03, Q04) of wages and salaries cost per hour worked for the same occupation category (\$21.9175). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. "ECEC Civilian Workers - 2004 to Present." March 2022. Available at https://www.bls.gov/web/ecec.supp.toc.htm. Accessed May 25, 2022

this information collection is \$14,905,180. This is based on the number of responses that must be reviewed (1,322,000) multiplied by the time burden to review and process each response (4 minutes or 0.166 hours) = 219,452 hours multiplied by the average hourly loaded rate for a CBP Officer (\$67.92)<sup>2</sup> = \$14,905,180.

# 15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

There has been a decrease in the estimated annual burden hours previously reported for this information collection. To reduce paperwork and remove duplication of information, the CBP Form 7507 is being streamlined, thus reducing the time respondents spend completing the form—reducing the time per response from 5 minutes to 2 minutes and reducing the over annual burden reported from 110,123 to 44,023.

# 16. For collection of information whose results will be published, outline plans for tabulation, and publication.

This information collection will not be published for statistical purposes.

# 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

CBP will display the expiration date for OMB approval of this information collection.

# 18. Explain each exception to the certification statement.

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

### B. Collection of Information Employing Statistical Methods

No statistical methods were employed.

<sup>2</sup> CBP bases this wage on the FY 2022 salary and benefits of the national average of CBP Officer Positions, which is equal to a GS-11, Step 10. Source: Email correspondence with CBP's Office of Finance on June 27, 2022.