

Supporting Statement
Application for Identification Card
1651-0008

Justification

- 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.**

CBP Form 3078, *Application for Identification Card*, is completed for the purpose of collecting an applicant's information to conduct a meaningful background investigation to determine whether the applicant meets the criteria to obtain an Identification Card that is used to gain access to CBP Customs Security Areas (CSA). This form collects biographical information and is usually completed by airport employees, CBP Security Area Identification, Warehouse Officer or Employee, Container Station Employee, Foreign Trade Zone Employee, CES Employee, licensed Cartmen or Lightermen whose duties require receiving, transporting, or otherwise handling imported merchandise which has not been released from CBP custody. This form may be submitted electronically or to the local CBP office at the port of entry that the respondent will be requesting access to the Federal Inspection Section (FIS). Form 3078 is authorized by 19 U.S.C. 66, 1551, 1555, 1565, 1624, 1641; and 19 CFR 112.41, 112.42, 118, 122.182, and 146.6. This form is accessible at:

<https://www.cbp.gov/newsroom/publications/forms?title=3078&=Apply>

- 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 .**

Airport operators and in some cases, employers collect biographic information on Form 3078 and biometrics during the initial application process for the Secured Identification Display Area (SIDA) and submit the information to CBP for verification. This information is needed to determine the eligibility of an employee seeking entrance to the CBP CSA. Employers must attest in writing that a background check has been completed and must retain such background checks for a period of one year and be made available upon request of the port director. TSA submits the biometrics to the Federal Bureau of Investigation and shares the biometrics with CBP to verify identity and conduct a background investigation to determine whether the applicant meets the criteria's required for the issuance of a CBP Hologram Identification card.

- 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 Form 3078 is a fillable form on CBP's website at:

<https://www.cbp.gov/newsroom/publications/forms?title=3078&=Apply>. The Trusted Worker Program plans to fully automate the completion and submission of CBP Form 3078 through the use of a secure public facing portal where employers will be able to submit an application directly to be CBP on behalf of an applicant. Applicants who submit their applications online will be able to check the status and progression of their application, receive electronic communications, and receive electronic notification of a decision. Regulations change will be published before these changes are implemented.

Usability Testing:

The usability testing feedback for CBP Form 3078, gathered through a short survey with CBP Officers (who work closely with coordinators/end-users), highlighted several areas for improvement to enhance clarity and reduce the need for assistance. Officers noted that certain sections of the form could be clarified, as individuals unfamiliar with it often require help with specific sections, either getting help from their peers or contacting the CBP seals office. Common points of confusion include questions such as 1 (Type of Activity Requiring Identification Card), 5 (Citizenship requirement), 36 (Previous ID application with CBP), and 40 (acceptable identification forms). To address these issues, one user suggested an FAQ section to clarify recurring questions and address common misconceptions. These recommendations can help make the form more user-friendly and reduce the need for help from others.

- 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.**

This information is not duplicated in any other place or any other form. There are similar use collections within the Department (TSA, USCG), however, the data elements on CBP Form 3078 are not duplicative.

- 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 have an impact on small businesses or other small entities.

6. Describe consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If this information was not collected, CBP would have no way of securely vetting and identifying those authorized to enter CBP Customs Security Areas, Centralized Exam Stations, Foreign Trade Zone facilities, container stations, and facilities with bonded merchandise.

7. Explain any special circumstances.

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(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 September 25, 2024 (89 FR 78324) on which no comments were received, and on November 21, 2024 (89 FR 92138) 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.

A SORN for Persons Engaged in International Trade (Vol. 73, Page 77753), dated December 19, 2008 has been included in this ICR. 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 sensitive nature.

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

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
CBP Form 3078	56,667	200,000	1	200,000	17 minutes (0.2833 hours)

Public Cost

The estimated cost to the respondents is \$1,739,677. This is based on the estimated burden hours (56,667) multiplied by the average loaded hourly wage rate for truck drivers (\$30.70). CBP calculated this loaded wage rate, using guidance from the U.S Department of Transportation (DOT), by first multiplying a weighted average of the Bureau of Labor Statistics’ (BLS) 2023 median hourly wage rate for "Heavy and Tractor-Trailer Truck Drivers" and "Light Truck Drivers" (\$20.37), which CBP assumes best represents the wage for truck drivers, by the ratio of BLS’ Q4 2023 total compensation to wages and salaries for Transportation and Material Moving occupations (1.4544), the assumed occupational group for truck drivers, to account for non-salary employee benefits.^{1 2} CBP assumes an annual growth rate of 3.64% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.³

¹ U.S. Department of Transportation, Office of Transportation Policy. The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2016 Update), “Table 4 (Revision 2 - 2016 Update): Recommended Hourly Values of Travel Time Savings for Intercity, All-Purpose Travel by Air and High-Speed Rail.” September 27, 2016. The original hourly value (\$27.20) is provided in 2015 U.S. dollars, CBP adjusted this hourly rate to 2023 values using the methodology provided by DOT. Original DOT policy is available at <https://www.transportation.gov/sites/dot.gov/files/docs/2016%20Revised%20Value%20of%20Travel%20Time%20Guidance.pdf>. Accessed June 17, 2024.

² Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, “May 2023 National Occupational Employment and Wage Estimates United States.” Updated April 3, 2024. Available at https://www.bls.gov/oes/2023/may/oes_nat.htm. Accessed June 4, 2024. The total compensation to wages and salaries ratio is equal to the total compensation cost per hour worked for Transportation and Material Moving occupations (\$34.89) divided by the wages and salaries cost per hour worked for the same occupation category (\$23.99). See “Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group.” Bureau of Labor Statistics, “Employer Costs for Employee Compensation – December 2023.” Released March 13, 2024. Available at https://www.bls.gov/news.release/archives/ecec_03132024.pdf. Accessed June 4, 2024.

³ To adjust to 2024 dollars, multiply by the 2022-2023 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (122.273/117.973-1). See “Table 1.1.9. Implicit Price Deflators for Gross Domestic Product,” Line 1 Gross Domestic Product, annual. Bureau of Economic Analysis. Updated May 30, 2024. Available at <https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwYLDMsM10sImRhdGEiOltbImNhdGVnb3>

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

There are no record keeping, capital, start-up or maintenance costs associated with this information 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 these records is \$3,579,088. This is based on the number of responses that must be reviewed (200,000) multiplied by the time burden to review and process each response (17 minutes) = 56,667 hours multiplied by the average hourly loaded rate for other CBP employees (\$63.16)⁴ = \$3,579,088.

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

There is no change to the estimated annual burden hours previously reported for this collection. There is no change to the information collected or method of collection.

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, explain the reasons that displaying the expiration date would be inappropriate.

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

18. “Certification for Paperwork Reduction Act Submissions.”

CBP does not request and exception to the certification of this information

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⁴ CBP bases this wage on the FY 2023 salary and benefits of the national average of other CBP positions, which is equal to a GS-9, Step 6. Source: Email correspondence with CBP’s Office of Finance on June 17, 2024.

collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.