INFORMATION COLLECTION SUPPORTING STATEMENT

Enhanced Security Procedures at Ronald Reagan Washington National Airport (DCA)
OMB control number 1652-0035
Expiration 8/31/2025

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).

Section 823 of the Vision 100-Century of Aviation Reauthorization Act (Public Law 108-176, 117 Stat. 2489) (Vision 100) 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). *See* 49 U.S.C. 41717, note. The Transportation Security Administration (TSA) issued an interim final rule (IFR) implementing the requirements of section 823 in 2005. *See* 70 FR 41586 (July 19, 2005).

TSA's regulations require GA aircraft operators to designate a security coordinator and adopt a DCA Access Standard Security Program (DASSP). As part of the DASSP, the regulations require GA aircraft operators to ensure all flight crew members, armed security officers (ASOs), and security coordinators have undergone a fingerprint-based criminal history records check (CHRC).

Additionally, 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. To receive TSA authorization for a flight, GA aircraft operators must ensure that name-based security threat assessments 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 will inspect the aircraft and will screen 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.

---

[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 security threat assessment: individuals designated as security coordinators by FBOs and GA aircraft operators; flight crew members 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 a security threat assessment to assess whether the individuals pose a security threat. For flight crew members, 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 (FBI) 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; (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 criminal history records check and security threat assessment. 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 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, TSA has transitioned the ASO application materials to an online dashboard located at https://asop.tsa.dhs.gov. Prospective ASOs can complete application materials via this TSA online tool, which includes the following forms: TSA Form 3411, *Armed Security Officer Voluntary Questionnaire,* TSA Form 3412, *Armed Security Officer Authorization for Release of Information*; TSA Form 3413, *Armed Security Officer Lautenberg Certification*; TSA Form 3413-1, *Armed Security Officer 18 U.S.C. 922(g) Certification*. The following forms are completed during training and submitted electronically to the ASOP via Microsoft Teams or email: TSA Form 3414 *Armed Security Officer Assumption of Risk and Waiver of Responsibility and* TSA Form 3415, *Armed Security Officer Training Acknowledgement*. If needed, TSA will make paper forms available during training. TSA Form 3416, *Armed Security Officer Candidate Signature,* while accessible electronically on the dashboard, requires a wet signature. ASOs complete the form electronically, print to provide a wet signature, scan the completed form and submit via email.

Usability Testing Requirements: Pursuant to a 2023 DHS requirement, all Information Collection Requests must undergo usability testing (UX) prior to submission to OMB. *See* DHS Fiscal Year 2024 Burden Reduction Plan Memorandum dated, September 29, 2023. TSA completed an UX of the ASO electronic *Volunteer Questionnaire* (VQ) Form beginning December 11, 2024, and ending on December 13, 2024. The usability study tested for accuracy of burden and ease of use.

The UX included seven participants, who were not familiar with the new ASO Dashboard, including the VQ. Participants used sample data to help complete the VQ. In regard to the accuracy of burden, all seven testers, using the sample data, completed the electronic form in 11 minutes. However, as respondents did not have to pull and gather previous employment data to accurately complete the form, which TSA estimates will take approximately 30 to 40 minutes, TSA will not adjust the current estimated burden of 50 minutes to 11 minutes.

Regarding overall ease of use, participants found the VQ form and dashboard were easy to navigate and to complete. However, UX participants recommended putting a "Hint Text" for

entering a phone number and date (i.e., (XXX) XXX-XXXX and MM/DD/YYYY) and/or having a date picker added; and organizing the previous employment history in chronological order from most recent to last employer. TSA will work with the ASO dashboard engineers to implement the recommendations.

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 a security threat assessment for purposes of GA flights into and out of DCA. Because information from GA pilots, flight crew members, 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 anywhere else.

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 businesses 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 security threat assessments, 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 security threat assessments on flight crewmembers, security coordinators and ASOs and name-based security threat assessments on passengers and flight crewmembers onboard GA aircraft operating into or out of DCA. Conducting security threat assessments 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* 89 FR 92960 (November 25, 2024) and 90 FR 17076 (April 23, 2025). 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 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). The Privacy Impact Assessment (PIA), DHS/TSA/PIA-003 - Airspace Waiver and Flight for Certain Aviation Operations (Including DCA), was published on September 20, 2005, 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 78 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 and flight crew

members. TSA estimates it takes 1 hour to complete and submit a DASSP application, for an annual hour burden of 78 hours (234 over three years). TSA uses a fully-loaded wage rate[2] of $110.60[3] to estimate an annual hour burden cost of $8,627 ($25,881 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 $110.60
78	1	78	$8,627

ASO nomination packets are processed separately. TSA processes an average of 84 ASO packets annually. TSA estimates it takes 70 minutes (1.167 hours) to complete and submit an ASO packet, for an annual hour burden of 98 hours (294 over three years). TSA uses a fully-loaded wage rate of $110.60[4] to estimate an annual hour burden cost of $10,839 ($32,517 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 $110.60
84	1.1667	98	$10,839

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 176 hours (528 over three years) and the total annual hour burden cost is $19,465 ($58,396 over three years). Table 3 summarizes this calculation.

Table 3: Total Hour Burden and Hour Burden Cost

	DASSP Applications	ASO Packets	Total 1 Year	Total 3 Years
	A	B	C	D
Hour Burden	78	98	176	528
Hour Burden Costs	$8,627	$10,839	$19,465	$58,396

---

[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 $74.47. BLS. May 2023 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481200 - Nonscheduled Air Transportation. OCC 11-1021 General and Operations Managers. Last modified April 3, 2024 (accessed January 8, 2025), https://www.bls.gov/oes/2023/May/naics3_481000.htm. To estimate a fully-loaded wage rate, TSA calculates a compensation factor by dividing the total compensation ($38.45) by the salary component of compensation ($25.89). The compensation factor is 1.48513. BLS. Employer Costs for Employee Compensation – September 2024. 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 December 17, 2024 (accessed January 8, 2025), https://www.bls.gov/news.release/archives/ecec_12172024.htm. The fully-loaded wage rate is the result of multiplying the unloaded wage rate and the compensation factor: $110.60 = $74.47 x 1.48513.

[4] Ibid.

13. *Provide an estimate of the annualized capital and start-up costs resulting from the collection of information.*

TSA estimates that security coordinators, ASOs, and flight crew members will complete a CHRC for purposes of this ICR. TSA estimates a fee of $15 for each STA. TSA estimates that the additional cost for processing an estimated 314 (942 over three years) background checks based on information collected will be $4,710 annually ($14,130 over three years). In addition, TSA charges an ASO training fee of $490 per ASO (84 x 490=$41,160). 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. Total Fees for DASSP Application STAs

Type of STA	Number of Annual STA Responses	STA Fee per Applicant	Annual STA Fee Burden
	A	B	C = A x B
Security Coordinator STA	78		$1,170
Flight crew member STA	152		$2,280
ASO STA	84	$15	$1,260
LE ASO Training Fee	84	$490	41,160
Total			**$45,870**

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 $45,870 + $150,540 = $196,410 annually, or $589,230 over 3 years.

---

[5] TSA assumes 2 legs per flight to account for arrival and departure; therefore, the fee is $296 per aircraft.
[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 2024-2025.

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 J-Band employees with a fully-loaded hourly wage of $104.17[7], for an annual hour cost burden of $65,005. 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 $89.18[8], for an annual hour burden cost of $8,739. The total annual hour burden for TSA is 722 (2,166 over three years) and the total annual hour burden cost is $73,744 ($221,232 over three years). Table 6 summarizes these calculations.

---

[7] 2025 Transportation Security Administration Compensation Plan Pay Chart, Resource Management Office (RMO) TSA uses a fully-loaded, hourly pay rate for SV J-Band (GS-14 equivalent) Step-5, for the National Capital Region, of $104.17. Includes Washington-Baltimore-Arlington area Locality Pay.

[8] The mix is 95 percent I-Band and 5 percent J-Band employees: $89.18 = (0.95 x $88.39) + (0.05 x $104.17). 2025 Transportation Security Administration Compensation Plan Pay Chart.

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	78	8	624	$104.17	$65,004.81
ASO Packet	84	1.1667	98	$89.18	$8,739.35
Total	**162**		**722**		**$73,744.16**

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 updated the respondent and burden numbers for collection.

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.