

# INFORMATION COLLECTION SUPPORTING STATEMENT

## 1652-0051 Physical Surface Transportation Security Exp. 10/30/2025

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).***

The Transportation Security Administration (TSA) was established by the Aviation and Transportation Security Act (ATSA) as the primary federal authority to enhance security for all modes of transportation.<sup>1</sup> The scope of TSA's authority includes assessing security risks, developing security measures to address identified risks, and enforcing compliance with these measures.<sup>2</sup> TSA also has broad regulatory authority to issue, rescind, revise, and enforce, regulations as necessary to carry out its transportation security functions.<sup>3</sup>

As part of the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act),<sup>4</sup> Congress directed TSA to use its regulatory authority to enhance surface transportation security through regulations addressing the following issues: (1) security training of frontline public transportation, railroad, and over-the-road bus (OTRB) employees, including prescriptive requirements for who must be trained, what the training must encompass, and how to submit and obtain approval for a training program;<sup>5</sup> (2) vetting of frontline employees and security coordinators;<sup>6</sup> and vulnerability assessments and security plans for higher-risk operations.<sup>7</sup> The 9/11 Act also mandates regulations requiring higher-risk railroads and OTRBs to appoint security coordinators.<sup>8</sup>

Pursuant to this authority, on March 23, 2020, TSA issued the final rule, *Security Training for Surface Transportation Employees*, (Security Training Rule) which set-up a structure for a security program for surface transportation operations that will eventually incorporate all of the previous requirements mandated by the 9/11 Act. See 49 CFR parts 1500, 1520, 1570, 1580, 1582, and 1584. Through these regulations, TSA established the requirement for higher-risk public transportation agencies and passenger railroads (PTPR), freight railroads, and OTRBs to submit a security program to TSA for approval, with the first requirement to

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<sup>1</sup> Pub. L. 107-71 (115 Stat. 597; Nov. 19, 2001). ATSA created TSA as a component of the Department of Transportation. Section 403(2) of the Homeland Security Act of 2002, Pub. L. 107-296 (116 Stat. 2135; Nov. 25, 2002), transferred all functions related to transportation security, including those of the Secretary of Transportation and the Under Secretary of Transportation for Security, to the Secretary of the Department of Homeland Security (DHS). Pursuant to DHS Delegation Number 7060.2, the Secretary delegated to the Administrator, subject to the Secretary's guidance and control, the authority vested in the Secretary with respect to TSA, including the authority in sec. 403(2) of the Homeland Security Act.

<sup>2</sup> See 49 U.S.C. § 114, which codified section 101 of ATSA.

<sup>3</sup> *Id.*

<sup>4</sup> Pub. L. 110-53 (121 Stat. 266; Aug. 3, 2007).

<sup>5</sup> See secs. 1408, 1517, and 1534 of the 9/11 Act, codified at 6 U.S.C. §§ 1137, 1167, and 1184, respectively.

<sup>6</sup> *Id.* at secs. 1411, 1512, 1520, and 1531, as codified at 6 U.S.C. §§ 1411, 1512, and 1531 (section 1520 of the 9/11 Act is uncoded).

<sup>7</sup> *Id.* at secs. 1405, 1512, and 1531, as codified at 6 U.S.C. §§ 1405, 1512, and 1531.

<sup>8</sup> See secs. 1512 and 1531 of the 9/11 Act, codified at 6 U.S.C. §§ 1162 and 1181, respectively. TSA addresses 1512(e)(1)(A) and 1531(e)(1)(A) in the final rule. TSA intends to address the other regulatory requirements of these provisions in separate rulemakings.

address security training of security-sensitive employees (a term defined to align with the 9/11 Act's definition of "frontline employees").<sup>9</sup> See 49 CFR 1580.101, 1582.101 and 1584.101. TSA will address additional requirements for the security program in future rulemakings promulgated through the notice-and-comment process.

The purpose of these requirements is to solidify the baseline of security for higher risk surface transportation operations by improving and sustaining the preparedness of surface transportation employees in higher-risk operations, including their critical capability to prepare, observe, assess and respond to security risks and potential security breaches within their unique working environment.

Prior to the publication of the Security Training Rule, pursuant to 49 U.S.C. § 114, TSA promulgated rail transportation security regulations in 2008 and 2019, codified at 49 CFR parts 1570, 1580, and 1582. These regulations required certain freight railroad carriers, passenger railroad carriers, rail transit systems, rail hazardous materials shippers ("shippers"), and rail hazardous materials receivers ("receivers") to maintain and/or submit information to TSA.

TSA is consolidating two overlapping OMB Control Numbers, 1652-0051 Rail Transportation Security, which collects and uses information collected under 49 CFR parts 1570 and 1580, with 1652-0066 Security Training Program for Surface Transportation Employees, which collects and uses information collected under 49 CFR parts 1570, 1580, 1582, and 1584. In light of the revision to consolidate the collections, TSA will request that OMB discontinue OMB Control Number 1652-0066 Security Training Program for Surface Transportation Employees and will change the title of the collection under OMB Control Number 1652-0051 from "Rail Transportation Security" to "Physical Surface Transportation Security." As described below, this regulation requires the collection of information to implement the regulatory requirements.

**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.***

All information collected is used by TSA and DHS to enhance the security of the Nation's Surface Transportation systems. TSA also collects and uses this information to validate compliance with the regulatory requirements. For purposes of this collection, the regulated entity (the entity responsible for compliance and liable for failure to comply) is the owner/operator of the railroad, public transportation system, or OTRB company that falls within each regulation's applicability.

Security Training Program. 49 CFR 1580.113, 1582.113, and 1584.113 require that the following populations submit a security training program to TSA and maintain security training records: Class I freight railroads (as described in §1580.1(a)(1)); each freight railroad carrier (as described in § 1580.1(a)(1)) that transports one or more categories of Rail Security Sensitive Material in a High Threat Urban Area (HTUA) as defined in the rule; railroads (as described in § 1580.1(a)(4)) that serves as a host railroad to a freight railroad described in paragraph (a) of (b) of this section or a passenger operation described in § 1582.101 of the regulation; Amtrak (also known as the National Railroad Passenger

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<sup>9</sup> Definitions can be found in sec. 1402 and 1501 of the 9/11 Act, as codified at 6 U.S.C. §§ 1131 and 1151.

Corporation); each PTPR owner/operator identified in Appendix A to part 1580; each PTPR owner/operator that serves as a host railroad to a higher risk freight operation or to a higher risk passenger train operation; and each OTRB owner/operator providing fixed-route service that originates, travels through, or ends in a geographic location identified in Appendix A to part 1584. Owner/operators subject to these regulations must provide training to security-sensitive employees addressing how to prepare, observe, assess and respond to terrorist-related threats and/or incidents. Each owner/operator required to have a security training program needs to submit the program to TSA for approval to ensure that the program meets the required program elements. TSA then reviews the program submitted to verify that the training program satisfies the regulatory requirements. TSA uses the information collected to approve the security training program or provides direction on required modifications that the owner/operator needs to make to the program to be compliant with the regulation.

Security Training Records. Each owner/operator subject to the security training rule is required to maintain security training records for each individual trained for no less than 5 years from the date of the training. Location of training records needs to be specified in the security training program and owner/operators are required to make the records available to TSA upon request. This record retention schedule is necessary to validate compliance with the requirement to provide triennial training.

Security Coordinator. 49 CFR 1570.201 requires that each owner/operator of certain populations designate and submit to TSA the contact information for a primary and at least one alternate security coordinator.<sup>10</sup> Each owner/operator required to have a security coordinator must provide in writing to TSA the name(s), U.S. citizenship status, title(s), phone number(s), and email address(es) of the primary and at least one alternate security coordinator within 37 calendar days of the effective date of the rule, commencement of operations, or change in any of the information required by 49 CFR 1570.201. Security coordinator contact information provides a primary contact for intelligence information, security related activities, and communications with TSA concerning threat information, security procedures, and coordination of incident or threat responses with appropriate law enforcement and emergency response agencies.

Reporting significant security concerns. 49 CFR 1570.203 requires that each owner/operator of certain populations report significant security concerns to TSA.<sup>11</sup> Potential threats or

<sup>10</sup> Populations designated under 49 CFR 1570.201 include: each freight railroad carrier that operates rolling equipment on track that is part of the general railroad system of transportation; each rail hazardous materials shipper; each rail hazardous materials receiver located within a High Threat Urban Area (HTUA); each freight railroad carrier serving as a host railroad to a freight railroad operation described in 49 CFR 1580.1(a) or a passenger operation described in 49 CFR 1582.1; some owners/operators of private rail cars, including business/office cars and circus trains, on or connected to the general railroad system of transportation; each passenger railroad carrier; some public transportation agencies; each operator of a rail transit system that is not operating on track that is part of the general railroad system of transportation, including heavy rail transit, light rail transit, automated guideway, cable car, inclined plane, funicular, and monorail systems; some tourist, scenic, historic, and excursion rail owners/operators, whether operating on or off the general railroad system of transportation; and each OTRB owner/operator providing fixed-route service that originates, travels through, or ends in a geographic location identified in appendix A to 49 CFR part 1584.

<sup>11</sup> Populations designated under 49 CFR 1570.203 includes: each freight railroad carrier that operates rolling equipment on track that is part of the general railroad system of transportation; each rail hazardous materials shipper; each rail hazardous materials receiver located within a High Threat Urban Area (HTUA); each freight railroad carrier serving as a host railroad to a freight railroad operation described in 49 CFR 1580.1(a) or a passenger operation described in 49 CFR 1582.1; each owner/operator of private rail cars, including business/office cars and circus trains, on or connected to the general railroad system of transportation; each passenger railroad

significant security concerns encompass incidents, suspicious activities, and threat information. TSA uses this reported information to analyze trends and indicators of developing threats and potential terrorist activity.

Location and shipping information. 49 CFR 1580.203 requires freight railroad carriers that transport one or more of the categories and quantities of rail security-sensitive materials, hazardous materials shippers, and hazardous materials receivers in a HTUA, to provide location and shipping information on rail cars under their physical custody and control to TSA upon request. Rail security-sensitive materials include explosive materials, materials poisonous by inhalation, and radioactive materials. Location and shipping information will primarily be used in times of heightened threat or attack to ascertain the location and number of potential targets in a specified geographic area so that the appropriate countermeasures can be implemented.

Chain of custody and control requirements. 49 CFR 1580.205 requires a secure chain of physical custody for rail cars containing rail security-sensitive materials, which, in turn, requires freight railroad carriers and certain hazardous materials shippers and receivers of rail security-sensitive materials to document the transfer of custody of certain rail cars in writing or electronically and to retain these records for a minimum of 60 calendar days and make them available to TSA upon request. Specifically, this section requires documentation of the secure exchange of custody of rail cars containing rail security-sensitive materials between: a rail hazardous materials shipper and a freight railroad carrier; two separate freight railroad carriers, when the transfer of custody occurs within a HTUA, or outside of an HTUA, but the rail car may subsequently enter a HTUA; and a freight railroad carrier and a rail hazardous materials receiver located within a HTUA. The documentation must uniquely identify that the rail car was attended during the transfer of custody, including car initial and number; identification of individuals who attended the transfer (names or uniquely identifying employee number); location of transfer; and date and time the transfer was completed. This section addresses the risk that rail cars left unattended in a non-secure area may be vulnerable to tampering. These situations create opportunities for individuals to compromise the security of rail cars transporting poisonous inhalation hazard, explosive, or radioactive material through tampering with valves or the placement of a covert explosive device.

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carrier; some public transportation agencies; each operator of a rail transit system that is not operating on track that is part of the general railroad system of transportation, including heavy rail transit, light rail transit, automated guideway, cable car, inclined plane, funicular, and monorail systems; each tourist, scenic, historic, and excursion rail owners/operators, whether operating on or off the general railroad system of transportation; and each OTRB owner/operator providing fixed-route service that originates, travels through, or ends in a geographic location identified in appendix A to 49 CFR part 1584.

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.]***

TSA complies with the Government Paperwork Elimination Act to reduce the burden on covered entities by encouraging electronic submissions and retention of the information collections in this final rule.

Security Training Program. Owner/operators subject to the regulatory requirements may submit their security training programs through email, through a secure website, or by regular mail. Implicit in this requirement is the necessity of ensuring that the submission method chosen allows TSA access to the content.

Security Training Records. Owner/operators subject to the regulatory requirements have the latitude and flexibility to maintain the required security training records in a manner that best meets their needs, including maintaining the information electronically. Implicit in this requirement is the necessity of ensuring the method used to maintain records does not prevent TSA's access to the content upon request.

Security Coordinator Contact Information. Owner/operators subject to the regulatory requirements may submit security coordinator contact information via email or regular mail, using a TSA-provided form. Implicit in this requirement is the necessity of ensuring that the submission method chosen allows TSA access to the content.

Reporting significant security concerns. Owner/operators subject to the regulatory requirements may submit significant security concerns to TSA through email, a secure website, or other format approved by TSA. Implicit in this requirement is the necessity of ensuring that the submission method chosen allows TSA access to the content.

Location and shipping information. Owner/operators subject to the regulatory requirements may submit location and shipping information to TSA upon request through email, a secure website, fax, regular mail, or other format approved by TSA. Implicit in this requirement is the necessity of ensuring that the submission method chosen allows TSA access to the content.

Chain of custody and control requirements. Owner/operators subject to the regulatory requirements have the latitude and flexibility to retain the chain of custody and control documents in a manner that best meets their needs, including maintaining the information electronically, and may submit the information to TSA upon request through email, a secure website, regular mail, or other format approved by TSA. Implicit in this requirement is the necessity of ensuring the method used to maintain and submit the documents does not prevent TSA's access to the content.

Usability Study Requirement. TSA completed a usability study on the 49 CFR 1570.201 Designation of Primary and Alternate Security Coordinator form. The purpose of the study was to determine the ease of use of the data request table to provide the required primary and alternate security coordinator contact information to TSA. The study included four participants, completing the form electronically. The four participants were not active users and were unaware of the Designation of Primary and Alternate Security Coordinator form prior to the usability study. TSA determined the average time to complete the form for the participants was 9.25 minutes, which corresponds to the current estimated time burden of 10 minutes. All participants completed the form without physical assistance and with minimal guidance. Most users explicitly stated that the table was easy to use. However, the participants provided recommendations for technical improvement. Participants recommended a more aesthetically pleasing design that draws the users to the table; guidance for overwriting the text within the table when completing the form; bigger font for easier reading. TSA chose to keep the table format of the data request as it best meets program needs.

**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.***

This regulation requires reporting of significant security concerns. The regulation provides examples of what constitutes a “security concern.” It is not an “all hazards” reporting requirement, particularly as there are other agencies with responsibility for all hazards. For example, the Coast Guard is the Federal point of contact for reporting all hazardous substances releases and oil spills to inform response and recovery efforts. TSA’s purpose for collecting this information is not oriented to accidents but rather to discern potential threats and significant security concerns.

Implementation of the regulation also results in information collected to determine if a covered entity’s security-sensitive employees are being provided effective security training and to establish a seamless and expeditious capability to contact industry for communicating intelligence information. TSA contacted the relevant modal administrations of the Department of Transportation, including the Pipeline and Hazardous Materials Safety Administration and the Federal Railroad Administration, along with the Nuclear Regulatory Commission, who concur that these reporting requirements are not duplicative of their respective requirements because each supports a particular agency mission and programmatic purpose.

**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 information collection impacts small businesses; however, TSA has determined that the collection will not have a significant impact on a substantial number of small businesses. In order to minimize any burden this information collection creates, TSA permits submission of information electronically for all of the requirements.

**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.***

If the information is not collected in the manner prescribed by the regulations, TSA will not be able to achieve the congressionally mandated requirements set forth in the 9/11 Act. Lack of this information will hinder TSA's responsibility to assess vulnerabilities and carry out requirements to secure the Nation's surface transportation system. TSA has carefully tailored its information collection activities to only those collections that are necessary to support its security programs.

Security Training Program. Without the collection of security training programs from persons subject to the regulatory requirements, TSA is unable to verify if regulated owner/operators are fulfilling the requirements of this regulation or provide feedback when a security training program warrants modification. If TSA determines the program submitted meets the regulatory requirements, the owner/operator does not need to submit additional programs to TSA unless or until amendments or updates are required. If modifications are required, the owner/operator needs to re-submit their training program as many times as necessary to obtain TSA-approval. As such, it is not practical for TSA to reduce the frequency of collection.

Security Training Records. Without a security training records requirement, TSA would be unable to verify that a person subject to the regulatory requirements is complying with the final rule's requirements in the manner and schedule stipulated in the TSA-approved training program. A less frequent retention schedule would adversely affect the inspection process and impede verification of compliance with a regulatory requirement.

Security Coordinator Information. TSA is responsible for sharing intelligence and other risk information relevant to the transportation industry. Lack of security coordinator information impedes TSA's ability to share information, potentially resulting in diminished capability for the industry and government to assess and respond to threats, incidents, and other security-related actions.

Significant Security Concerns Information. The lack of reporting of significant security concerns impedes TSA's ability to analyze potential security-risk information and recognize trends that warrant a Federal response.

Location and Shipping Information. During heightened threat or an incident, TSA uses the location and shipping information to identify whether there are any cars carrying explosives, toxic inhalation hazards, or radioactive material in or near high population areas or potential targets, and to initiate appropriate mitigation measures. TSA would be unable to do this if location and shipping information was not available.

Chain of Custody and Control Documentation. TSA requires affected freight railroad carriers and shippers and receivers of rail security-sensitive materials to document the exchange of custody and control of rail cars carrying rail security sensitive material to ensure that covered entities comply with all other requirements of that section. Without this collection, TSA is unable to ensure that rail cars containing covered materials are attended during the exchange of custody and therefore, not left unattended in a non-secure area and vulnerable to sabotage while awaiting transfer.

**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).***

Based on the reasons discussed above, the purposes of this information collection will not be met if collection is conducted in a manner consistent with the general information collection guidelines of 5 CFR 1320.5(d)(2)(i) and 5 CFR 1320.5(d)(2)(iv).

Under the regulation, TSA provides for owner/operators to recognize security training that employees may have received from another employer if it meets the regulatory requirements. TSA believes owner/operators need to maintain training records for no less than 5 years to ensure the information is available for documentation of previous training.

In order for TSA to analyze potential security-risk information and recognize trends warranting a Federal response, it is critical for the regulated entities to report significant security concerns within 24 hours of initial discovery.

In the interest of transportation security and to aid in detecting terrorist activities, regulated entities must respond to TSA's request for location and shipping within 30 minutes of a TSA notification. TSA may approve a longer period of time based on the threat and the covered party's circumstances.

**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 published a *Federal Register* notice, with a 60-day comment period soliciting comments of the collection of information. See 90 FR 16697 (April 21, 2025). Additionally, TSA published a 30-day notice in the *Federal Register*. See 90 FR 29031 (June 2, 2025). These notices did not generate any comments on the collection of information.

**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.**

While there is no assurance of confidentiality provided to the respondents, TSA protects information collected from disclosure to the extent appropriate under applicable provisions of the Freedom of Information Act, Federal Information Security Management Act, E-Government Act, and Privacy Act of 1974. TSA would also appropriately treat any information collected that it determines is Sensitive Security Information and/or Personally Identifiable Information, consistent with the requirements of 49 CFR part 1520 and OMB Guidance, M-07-16.

Privacy Impact Assessment (PIA) coverage for this collection is provided under DHS/TSA/PIA-029 TSA Operations Center Incident Management System. This PIA outlines the use of the WebEOC incident management system to perform incident management, coordination, and situational awareness functions for all modes of transportation.

**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 will not ask any questions of a sensitive or private nature.

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

TSA regulations require respondents to report information to TSA when submitting or amending a Security Training Program (STP), STP recordkeeping, as well as on the basis of when a particular event occurs, such as when a security coordinator point of contact's information changes, the discovery of a significant security concern, or a transfer of custody. As such, the number of annual respondents fluctuates based on how often respondents covered by this information collection experience events that trigger a response. TSA estimates the number of annual respondents to potentially be 2,070. This is the total number of primary and alternate security coordinators for entities that may be required to submit information to TSA covered by this information collection.

STP Development and Submission, Amendments, and Security Training Recordkeeping.

TSA is consolidating this collection with OMB control number 1652-0066 *Security Training Program for Surface Transportation Employees*. Under 1652-0066, TSA required that owner/operators of certain freight railroads, PTPRs, and OTRB companies submit a security training program to TSA and maintain security training records. All surface transportation entities currently required to submit security training plans have already done so; however, TSA estimates 10 percent will amend their security training plans each year. It takes approximately 8 hours to amend an STP, and TSA assumes this task is performed by a

Security Coordinator. TSA applies a fully loaded<sup>12</sup> wage rate of \$90.62<sup>13</sup> for the Security Coordinator. The burden estimate is depicted in Table 1.

TSA estimates four new owner/operators will submit their STPs each year, and it takes approximately 36 hours to develop an STP. Approximately 90 percent of new STPs need to be modified after the initial submission, so TSA assumes all four of the new STPs each year will need to be modified. Modifications take an additional 25 hours, so the hour burden per new STP is 36 hours + 25 hours = 61 hours. The burden estimate is depicted in Table 1.

Recordkeeping. The Security Training Rule requires that respondents maintain the training records of their security-sensitive employees. After initial training, covered entities must update individual employee training records to reflect security training being received every 3 years. The average annual responses would vary depending on the number of employees that an owner/operator trains in a given year. TSA estimates that each record has a time burden of 1 minute (0.0167 hours) to be created and/or updated, performed by an administrative assistant, and applies a fully loaded wage rate of \$44.42<sup>14</sup> to estimate the hour burden cost. The hour burden estimate is depicted in Table 1.

**Table 1: STP Development and Submission, Amendments, and Recordkeeping**

Requirement	Number of Annual Responses	Hours per Response	Total Annual Hour Burden	Wage Rate	Annual Hour Burden Cost	Total 3 Year Hour Burden Cost
	A	B	C = A x B	D	E = C x D	F = E x 3
STP Development and Submission	4	61	244	\$90.62	\$22,111.28	\$66,333.84
STP Amendments	104	8	832	\$90.62	\$75,395.84	\$226,187.52
Training Recordkeeping	119,685	0.0167	1,995	\$44.42	\$88,617.90	\$265,853.70
<b>Total</b>	<b>119,792.50</b>		<b>3,071</b>		<b>\$186,125.02</b>	<b>\$558,375.06</b>

<sup>12</sup> A fully-loaded wage rate includes non-wage employer compensation costs, such as retirement and health benefits.

<sup>13</sup> The hourly wage rate for security coordinators is \$61.18. BLS. May 2023 National Industry-Specific Occupational Employment and Wage Statistics, Rail Transportation (NAICS 482000); using Transportation, Storage, and Distribution Managers (SOC 11-0000) for rail security coordinators. [https://www.bls.gov/oes/2023/may/naics3\\_482000.htm](https://www.bls.gov/oes/2023/may/naics3_482000.htm). Accessed January 27, 2025. For a compensation factor, TSA uses data from BLS. Employer Costs for Employee Compensation. Table 4: Employer Costs for Employee Compensation for Private Industry Workers, by Occupational and Industry Group. Private Industry Workers: Transportation and Material Moving. [https://www.bls.gov/news.release/archives/eccec\\_12172024.htm](https://www.bls.gov/news.release/archives/eccec_12172024.htm). Accessed January 27, 2025. TSA takes the total compensation value (\$36.57) and divides it by the wages and salaries value (\$24.69) to calculate a compensation adjustment factor of 1.4812 (\$36.57 ÷ \$24.69). Multiplying the unloaded wage rate (\$61.18) by the compensation factor (1.4812) results in a fully-loaded wage rate of \$90.62.

<sup>14</sup> The unloaded wage rate for Administrative Assistants is \$29.99. BLS. May 2023 National Industry-Specific Occupational Employment and Wage Statistics, Rail Transportation (NAICS 482000); using Office and Administrative Support Occupations (Secretaries and Administrative Assistants) (SOC 43-6010). [https://www.bls.gov/oes/2023/may/naics3\\_482000.htm](https://www.bls.gov/oes/2023/may/naics3_482000.htm). Last modified April 3, 2024. Accessed February 6, 2025. TSA multiplies the unloaded wage rate (\$29.99) by the compensation factor (1.4812) to get the fully-loaded wage rate of \$44.42.

Security Coordinator Information. TSA estimates that there will be 436 annual responses to this information collection for security coordinator Information. TSA estimates that the hour burden per response will be 60 minutes (1 hour), for an annual hour burden of 436 hours. TSA calculates an annual hour cost burden to respondents of \$39,540. TSA calculates a 3-year total hour burden cost of \$118,619. Table 2 summarizes these calculations.

**Table 2: Hour Burden Cost for Security Coordinator Information**

<b>Number of Annual Responses</b>	<b>Hours per Response</b>	<b>Total Annual Hour Burden</b>	<b>Annual Hour Burden Cost</b>	<b>Total 3 Year Hour Burden Cost</b>
<b>A</b>	<b>B</b>	<b>C = A x B</b>	<b>D = C x \$90.62</b>	<b>E = D x 3</b>
436	1	436	\$39,539.55	\$118,618.65

NOTE: Calculations in the table may not be exact due to rounding.

Significant Security Concerns Reporting. TSA estimates that there will be 4,961 annual responses to this information collection for Significant Security Concern Reporting.<sup>15</sup> TSA estimates that the hour burden per response will be 60 minutes (1 hours) for an annual hour burden of 6,088 hours. To calculate an annual hour burden cost, TSA uses a fully-loaded<sup>16</sup> wage rate of \$90.62 for security coordinators.<sup>17</sup> TSA calculates an annual hour burden cost to respondents of \$551,681. TSA calculates a 3-year total hour burden cost of \$1,655,043. Table 3 summarizes these calculations.

**Table 3: Hour Burden Cost for Significant Security Concerns**

<b>Number of Annual Responses</b>	<b>Hours Per Response</b>	<b>Total Annual Hour Burden</b>	<b>Annual Hour Burden Cost</b>	<b>Total 3 Year Hour Burden Cost</b>
<b>A</b>	<b>B</b>	<b>C = A x B</b>	<b>D = C x \$90.62</b>	<b>E = D x 3</b>
6,088	1	6,088	\$551,680.95	\$1,655,042.85

NOTE: Calculations in the table may not be exact due to rounding.

<sup>15</sup> The average number of security reports from FY 2023 and FY 2024 was 6,088. TSA did not include FY 2022 reporting data due to impacts from the COVID pandemic.

<sup>16</sup> See footnote 4.

<sup>17</sup> See footnote 12.

Location and Shipping Information Reporting Burden. TSA estimates that there will be 327 annual responses to this information collection for Location and Shipping Information Reporting. TSA estimates that the hour burden per response will be 30 minutes (0.5 hours) for an annual hour burden of 163.5 hours. To calculate an annual hour burden cost, TSA uses a fully-loaded<sup>18</sup> wage rate of \$61.89 for dispatch officers.<sup>19</sup> TSA calculates an annual hour burden cost to respondents of \$10,103, and a 3-year total hour burden cost of \$30,310. Table 4 summarizes these calculations.

**Table 4: Hour Burden Cost for Location and Shipping Information**

Number of Annual Responses	Hours Per Response	Total Annual Hour Burden	Annual Hour Burden Cost	Total 3 Year Hour Burden Cost
A	B	C = A x B	D = C x \$61.89	E = D x 3
327	0.5	163.5	\$10,103.36	\$30,310.09

NOTE: Calculations in the table may not be exact due to rounding.

Chain of Custody Documentation. TSA estimates that there will be 228,946 annual responses to this information collection for Chain of Custody Documentation.<sup>20</sup> TSA estimates that the hour burden per response will be 30 minutes (0.5 hours) for an annual hour burden of 57,237 hours.<sup>21</sup> To calculate an annual hour burden cost, TSA uses a fully-loaded<sup>22</sup> wage rate of \$90.62 for security coordinators.<sup>23</sup> TSA calculates an annual hour burden cost to respondents of \$5,186,644. TSA calculates a 3-year total hour burden cost of \$15,559,931. Table 5 displays the hour burden cost for chain of custody documentation.

**Table 5: Hour Burden Cost for Chain of Custody Documentation**

Number of Annual Responses	Hours Per Response	Total Annual Hour Burden	Annual Hour Burden Cost	Total 3 Year Hour Burden Cost
A	B	C = A x B	D = C x \$90.62	E = D x 3
228,946	0.25	57,237	\$5,186,643.67	\$15,559,931.00

NOTE: Calculations in the table may not be exact due to rounding.

Total Hour and Hour Cost Burden for Respondents. TSA calculates a total hour burden and a total hour burden cost for the 3-year period by summing the total hour burdens and hour burden costs from each of the four elements of this collection. TSA calculates a total annual hour burden of 66,995 hours and a total annual hour burden cost of \$5,974,093. TSA

<sup>18</sup> See footnote 4.

<sup>19</sup> The hourly wage rate for dispatch officers is \$41.72. BLS. May 2023 National Industry-Specific Occupational Employment and Wage Statistics. NAICS 482000 - Rail Transportation. Occupation Code 43-5030 Dispatchers. Last Modified April 3, 2024. Accessed 1/27/2025. [https://www.bls.gov/oes/2023/May/naics3\\_482000.htm#13-0000](https://www.bls.gov/oes/2023/May/naics3_482000.htm#13-0000). TSA calculates a compensation factor to fully load the hourly wage. TSA takes the total compensation (\$36.57) and the salary and wages (\$24.69) of the most recently available quarter, and then calculates the compensation adjustment factor of 1.4812 by dividing the total compensation by the wage and salaries (\$36.57 ÷ \$24.69). BLS. Employer Costs for Employee Compensation. Quarterly report for September 2024. Table 4: Employer Costs for Employee Compensation for Private Industry Workers, by Occupational and Industry Group. Private Industry Workers: Transportation and Material Moving. [https://www.bls.gov/news.release/archives/ecec\\_12172024.htm](https://www.bls.gov/news.release/archives/ecec_12172024.htm). Last updated December 17, 2024. Accessed January 31, 2025. The fully loaded wage is calculated by multiplying the hourly wage (\$41.72) by the load factor (1.4812) for a fully loaded hourly wage rate of \$61.79.

<sup>20</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>21</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>22</sup> See footnote 4.

<sup>23</sup> See footnote 5.

calculates a total 3-year hour burden of 200,973 hours and a total 3-year hour burden cost of \$17,922,278. Table 6 summarizes these calculations.

**Table 6: Total Hour and Hour Cost Burden for Respondents**

	Security Training Program Development, Amendments, and Recordkeeping	Annual Hour Burden and Cost for Rail Security Coordination or Information	Annual Hour Burden and Cost for Significant Security Concerns	Annual Hour Burden and Cost for Location and Shipping Information	Annual Hour Burden and Cost for Chain of Custody Documentation	Total Annual Hour Burden and Cost	Total 3 Year Respondent Hour Burden and Cost
	A	B	C	D	E	F = A + B + C + D + E	G = F × 3
Hours	3,071	436	6,088	163.5	57,237	66,995	200,985
Costs	\$186,125.02	\$39,539.55	\$551,680.95	\$10,103.36	\$5,186,643.67	\$5,974,092.55	\$17,922,277.65

NOTE: Calculations in the table may not be exact due to rounding.

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

There is no additional annual cost burden to respondents or recordkeepers in excess of what is documented above. Information is typically stored electronically, and TSA assumes the marginal cost of electronic storage for this collection to be de minimis.

**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.**

STP Reviews.

TSA estimates it will review four new STPs per year. Of these, all four will require modifications and will be resubmitted. TSA estimates it takes 2 hours to review each STP, and 2 hours to conduct a modification review. Therefore, the time burden to TSA is  $8 \times 2$  hours = 16 hours per STP. This value is multiplied by the TSA compensation rate of a TSA analysts of \$82.16.<sup>24</sup> Table 7 summarizes these calculations.

**Table 7: TSA STP Processing Costs**

Number of Responses Processed	Time Per Review (Hours)	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total 3-Year Cost
A	B	C = A × B	D = C × \$82.16	E = D × 3

<sup>24</sup> A TSA analyst is an SV Pay Band H or Pay Band I employee. The fully loaded average wage rate is \$75.94 per hour for a Pay Band H, and \$88.39 for Pay Band I. TSA calculates a blended rate of  $(\$75.94 + \$88.39) \div 2 = \$82.16$ . Source: TSA Resource Management Office (RMO), 2025 TSA Wage Rates. Unless otherwise noted, TSA uses the Step 5 level and Locality Pay for the National Capital Region in determining the appropriate government wage rate.

8	2	16	\$1,314.62	\$21,033.92
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**Security Coordinator Information.** For each change in security coordinator information reported to TSA, a TSA employee typically spends 20 minutes (0.33 hours) processing the information change.<sup>25</sup> TSA estimates that there will be a total of 436 responses annually. TSA calculates the annual TSA hour burden 145.4 hours. The pay band of the TSA employee processing a change in security coordinator information is a G band or H band employee. TSA uses a fully loaded wage rate of \$69.77 for this pay band.<sup>26</sup> TSA calculates a total annual hour burden cost to TSA of \$10,148. TSA calculates the total 3-year hour burden cost to be \$30,444. Table 8 summarizes these calculations.

**Table 8: TSA Hour Burden Cost for Security Coordinator Information**

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total 3-Year Hour Burden Cost
A	B	C = A × B	D = C × \$69.77	E = D × 3
436	0.33	145.4	\$10,147.84	\$30,443.53

NOTE: Calculations in the table may not be exact due to rounding.

**Significant Security Concerns.** TSA estimates that there are 6,088 annual reports of significant security concerns.<sup>27</sup> For each report of a significant security concern, a TSA employee must document the report and respond to the reported concern. TSA estimates the documentation and response to take an average of 3 hours per report.<sup>28</sup> TSA calculates the total TSA annual hour burden to be 18,264 hours. The pay bands of TSA employees responding to reports of a significant security concern are a combination of H and I band. TSA uses a fully loaded wage rate of \$79.05<sup>29</sup> to estimate the annual hour burden cost to TSA. TSA estimates a total annual hour burden cost of \$1,433,801. TSA estimates a 3-year total hour burden cost of \$4,331,403. Table 9 summarizes these calculations.

**Table 9: TSA Hour Burden Cost for Significant Security Concerns**

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total 3 Year Hour Burden Cost
A	B	C = A × B	D = C × \$79.05	E = D × 3
6,088	3	18,264	\$1,433,801.02	\$4,331,403.06

NOTE: Calculations in the table may not be exact due to rounding.

<sup>25</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>26</sup> These data show all components of TSA employee compensation, including benefits, and locality pay for the National Capital Region. The fully loaded wage rate for a G band employee, Step 5, is \$63.60, and the fully loaded wage rate for an H band employee, Step 5, is \$75.94. The wage rate used is  $(\$63.60 + \$75.94) \div 2 = \$69.77$ . TSA Resource Management Office (RMO), TSA Wage Rates, 2025.

<sup>27</sup> TSA, Office of Security Operations, Transportation Security Operations Center.

<sup>28</sup> TSA, Office of Security Operations, Transportation Security Operations Center.

<sup>29</sup> See Footnote 23.

Location and Shipping Information. TSA estimates that there are 327 inspections conducted each year.<sup>30</sup> Each inspection takes 60 minutes (1 hour) but requires two inspectors.<sup>31</sup> Therefore, TSA uses an hour burden per inspection of 2 hours. TSA calculates the total TSA annual hour burden to be 654 hours. The pay bands of TSA employees conducting these inspections are H band and I band. TSA uses a fully loaded wage rate of \$79.05<sup>32</sup> to estimate the annual hour burden cost to TSA. TSA estimates a total annual hour burden cost of \$51,700. TSA estimates a 3-year total annual hour burden cost of \$155,100. Table 10 summarizes these calculations.

**Table 10: TSA Hour Burden Cost for Location and Shipping Information**

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total 3-Year Hour Burden Cost
A	B	C = A × B	D = C × \$79.05	E = D × 3
327	2	654	\$51,699.84	\$155,099.52

NOTE: Calculations in the table may not be exact due to rounding.

Chain of Custody Documentation. TSA estimates that there are 5,199 inspections of Chain of Custody Documentation annually.<sup>33</sup> Each inspection takes 3 hours, however two inspectors are required. Therefore, TSA estimates the hour burden of each inspection to be 6 hours.<sup>34</sup> TSA calculates the annual TSA hour burden to be 31,194 hours. The pay bands of TSA employees conducting the inspection are H band and I band. TSA uses a fully loaded wage rate of \$79.05<sup>35</sup> to estimate the total annual hour burden cost to TSA. TSA estimates a total annual hour burden cost to be \$2,465,940. TSA estimates the total 3-year hour cost burden to be \$7,397,820. Table 11 summarizes these calculations.

**Table 11: TSA Hour Burden Cost for Chain of Custody Documentation**

Number of Annual Responses	TSA Hours per Response	Total TSA Annual Hour Burden	Annual TSA Hour Burden Cost	Total 3-Year Hour Burden Cost
A	B	C = A × B	D = C × \$79.05	E = D × 3
5,199	6	31,194	\$2,465,940.05	\$7,397,820.14

NOTE: Calculations in the table may not be exact due to rounding.

<sup>30</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>31</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>32</sup> The weighted average compensation for a TSA Supervisory Transportation Security Inspector is estimated based on field office subject matter experts' distribution of pay bands for compliance inspections. TSA notes that bands will vary based on regional offices. Data was used from the 2025 TSA Wage Rates Table, TSA Resource Management Office (RMO). The H pay band, Step 5 pay rate is \$158,486 annual compensation based on the sum of all Personnel Compensation and Benefits for GS-12 Employees. The I pay band, Step 5 pay rate is \$184,465 annual compensation based on the sum of all Personnel Compensation and Benefits for GS-13 Employees. These data show all components of TSA employees compensation including benefits, so it constitutes a fully-loaded rate. TSA calculated a weighted average of H band (\$158,486) and I band (\$184,465) fully loaded salaries. TSA estimates that six H band employees and two I band employees on average will be involved in inspections.  $\$164,980.99 = [(2 \times \$151,780) + (6 \times \$90,186)] \div 8$ . OPM changed the 2080 work hours to 2087 by amending 5 U.S.C. 5504(b), the latter is assumed to capture year-to-year fluctuations in work hours. Source: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. Law 99-272, April 7, 1986)  $\$79.05 \text{ per hour} = \$164,980.99 \div 2087$ .

<sup>33</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>34</sup> TSA, Policy, Plans, and Engagement, Surface Division.

<sup>35</sup> See Footnote 23.

Total TSA Hour and Cost Burden. TSA calculates a total hour burden and a total hour burden cost for the 3-year period by summing the total hour burdens and hour burden costs from each of the five information requirements of this collection. TSA calculates a total annual hour burden of 50,273 hours and a total annual hour burden cost of \$3,972,903. TSA calculates a total 3-year hour burden of 150,820 hours and a total 3-year hour burden cost of \$11,918,710. Table 12 summarizes these calculations.



Table 12: Total Hour and Hour Cost Burden for TSA

	Annual Hour Burden and Cost for Security Program Reviews	Annual Hour Burden and Cost for Rail Security Coordinator Information	Annual Hour Burden and Cost for Significant Security Concerns	Annual Hour Burden and Cost for Location and Shipping Information	Annual Hour Burden and Cost for Chain of Custody Documentation	Total Annual Hour Burden and Cost	Total 3-Year Respondent Hour Burden Cost
	A	B	C	D	E	$F = A + B + C + D + E$	$G = F \times 3$
<b>Hours</b>	16.0	145.4	18,264.0	654.0	31,194.0	50,273.4	150,820.3
<b>Costs</b>	\$1,314.62	\$10,147.84	\$1,443,801.02	\$51,699.84	\$2,465,940.05	\$3,972,903.37	\$11,918,710.11

NOTE: Calculations in the table may not be exact due to rounding.

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

This collection includes requirements previously described in OMB Control Number 1652-0066 (Surface Security Training Rule). In addition, TSA revised the time estimates for the Chain of Custody, moving from .5 hours to .25 hours. This resulted in a decrease in the Chain of Custody burden.

**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.**

None of this information will be published.

**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 approval to not 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.**

There are no exceptions.