

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

**1652-0071**

## **Law Enforcement Officers Security Act and Retired Badge/Credential**

**Exp. 11/30/2025**

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).***

### **LAW ENFORCEMENT OFFICERS SAFETY ACT (LEOSA):**

The Law Enforcement Officers Safety Act (LEOSA)<sup>1</sup> allows a “qualified retired law enforcement officer”<sup>2</sup> to carry a concealed firearm in any jurisdiction in the United States, regardless of State or Local laws, with certain limitations and conditions. In accordance with LEOSA, the Department of Homeland Security (DHS) issued DHS Directive and Instruction Manual 257-01, *Law Enforcement Officers Safety Act* (December 22, 2017). This directive requires DHS components to implement the provisions of LEOSA pertaining to qualified retired Law Enforcement Officers (LEOs) as cost-effectively and efficiently as possible consistent with the requirements and intent of the statute for LEOs formerly employed by DHS and predecessor agencies.

TSA subsequently issued TSA Management Directive (MD) 3500.1, *LEOSA Applicability and Eligibility* (June 5, 2018), to implement the LEOSA statute and DHS directive. Under this MD, TSA issues photographic identification (ID) to qualified retired LEOs who separated or retired from TSA in “good standing” and meet other qualification requirements identified in this MD.

### **RETIRED BADGE/CREDENTIAL:**

Under TSA MD 2800.11, *Badge and Credential Program* (January 27, 2014), an employee retiring from Federal service is eligible to receive a “retired badge and/or credential” if the individual: (1) was issued a badge and/or credential during their service with TSA and was authorized to carry the badge/and or credential at the time of their retirement, (2) qualifies for a Federal annuity under the Civil Service Retirement System or the Federal Employees Retirement System , and (3) meets all of the other qualification requirements under the MD.<sup>3</sup>

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<sup>1</sup> Pub. L. 108-277 (118 Stat. 865, July 22, 2004), codified in 18 U.S.C. 926B and 926C, as amended by the Law Enforcement Officers Safety Act Improvements Act of 2010 (Pub. L. 111-272 (124 Stat. 2855, Oct. 12, 2010)) and National Defense Authorization Act for Fiscal Year 2013 (Pub. L. 112-239 (126 Stat. 1970, Jan. 2, 2013)).

<sup>2</sup> As defined in DHS Directive and Instruction Manual 257-01, *Law Enforcement Officers Safety Act*, (December 22, 2017).

<sup>3</sup> These instructions are included in DHS Instruction: 121-01-002 (Issuance and Control of DHS Badges); DHS Instruction 121-01-008 (Issuance and Control of the DHS Credentials); and the associated Handbook for TSA MD 2800.11.

If the employee is approved for a retired badge and/or credential, his or her badge and/or credential will be replicated by TSA and marked with the word “RETIRED” to indicate that the retired employee no longer has the authority to perform specific official functions pursuant to law, statute, regulation, or DHS Directive. In the case of a retired LEO, the individual is prohibited from using the TSA retired credential as photographic ID for the purposes of the LEOSA.

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.***

#### **LEOSA and RETIRED BADGE/CREDENTIAL**

Under TSA’s current application process for these two programs, qualified applicants may apply for a LEOSA ID Card, a retired badge, and/or a retired credential, as applicable, either while still employed by TSA (shortly before separating or retiring) or after they have separated or retired (after they become private citizens, *i.e.*, are no longer employed by the Federal Government).

The *LEOSA Identification Card Application* (TSA Form 2825A) requires collection of identifying information, contact information, official title, separation date, and last office. Identifying information, such as the date of birth and social security number, are necessary to confirm the individual’s identity and to process the individual through the National Crime Information Center database. In cases where an application has been denied, a LEO may request a review of the decision to not issue a LEOSA ID Card by forwarding a written request to TSA within 30 days of the issuance of the written decision. The request must contain the reason(s), and any supporting documentation, as to why the decision should be reversed.

The *Retired Badge and/or Retired Credential Application* (TSA Form 2808-R) requires collection of identifying information, contact information, TSA employment/position information (TSA component or government agency), official title, and entry on duty date. This collection of information is necessary to confirm the identity of the individual, conduct the necessary qualification process to determine the individual’s eligibility for a retired badge and/or credential, and to contact the individual if needed.

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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.]***

The majority of the information collection is electronic. Both LEOSA ID Card applicants and retired badge and credential applicants complete the TSA Form 2825A, *LEOSA Identification Card Application* and the TSA Form 2808-R, *Retired Badge and/or Retired Credential Application* forms electronically, but ordinarily print the form, sign and date the form, and forward it to their supervisors of record. After TSA supervisors review the application, they complete, sign and scan the form and submit it as a PDF to vetting officials in the TSA LE/FAMS Operations Management Division for formal review, processing, and a final determination of LEOSA and Retired Badge and Credential eligibility.

Usability Testing Requirement:

Pursuant to a 2023 DHS requirement, all Information Collection Requests must undergo usability testing (UX) prior to submission to the Office of Management and Budget (OMB). See DHS Fiscal Year 2024 Burden Reduction Plan dated, September 29, 2023. TSA completed UX on TSA Forms 2825A and 2808-R to ascertain ease of use and the accuracy of the burden time. Five participants took part in the UX; 3 were familiar with the forms and 2 were not. Participants found the forms easy to use and stated that the instructions were direct, clear, and used plain language. In regard to the burden time, the participants completed both forms within 3 - 4 minutes, which is comparable to the current estimated burden time of 5 minutes. One participant recommended that TSA include a link in TSA Form 2825A of the related law, defining the qualifications of a certified LEO. TSA considered the recommendation, but as the respondents are familiar with the qualifications, TSA did not implement the recommendation.

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

The information TSA needs for this program is not otherwise collected from this population.

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.***

There is no significant burden to small businesses.

- 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.**

This is a one-time collection for an applicant to receive a LEOSA ID Card, a retired badge, and/or a retired credential, as applicable.

- 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 collection will be conducted in a manner consistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

- 8. Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

TSA published a 60-day notice for this collection in the *Federal Register* on April 23, 2025 (90 FR 17075) and a 30-day notice on July 31, 2025 (90 FR 36066). TSA received no comments.

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

TSA does not provide payment or gifts to respondents.

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

TSA does not provide any assurance of confidentiality to the respondents; however, all information is handled in accordance with the Privacy Act of 1974. The applicable TSA system of records notice is DHS/TSA-002 Transportation Security Threat Assessment System, last published in the *Federal Register* on August 11, 2014 (79 FR 46862). The applicable Privacy Impact Assessment (PIA) is DHS/ALL/PIA-087 [Law Enforcement Officer Safety Act Program](#) (Nov. 13, 2020).

**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 is not posing questions of sensitive nature.

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

TSA receives approximately 168 requests for the LEOSA Application Form 2825A and 170 requests for the Retired Badge and Credential Application Form 2808-R, for a total of 338 applications annually.<sup>4</sup> The applicants are former LEOs with an approved Office of Personnel Management disability or voluntary retirement, or an individual who has separated from LE/FAMS as a LEO (e.g., could have retired, resigned to take a non-LEO position with TSA or another agency, or medically removed), or both.

Each former LEO will provide his/her information to TSA to help TSA determine whether or not the applicant is eligible to receive a LEOSA ID card, a retired badge and credential, or both. TSA estimates each respondent will spend approximately 5 minutes (0.083 hours) to complete either form. In addition, TSA expects three<sup>5</sup> reviews of rejected LEOSA Application Form 2825A submissions annually, and estimates it takes 8 hours for an applicant to create and submit a request. There are no requests for review for rejected Retired Badge and Credential Application TSA Form 2808-Rs.

TSA calculates an annual hour burden of 14 hours for the LEOSA Application Form 2825A, an annual hour burden of 24 hours (3 × 8 hours) for LEOSA Application Form 2825A requests a review, and 14.2 hours for the Retired Badge and Credential Application Form 2808-R, for a total annual hour burden of 52.2 hours for this information collection.

TSA uses the average hourly loaded wage of \$90.76, the fully-loaded<sup>6</sup> compensation rate for a retired federal LEO.<sup>7</sup> TSA multiplies this wage rate by the total annual hour burden of 38 hours (14 hours for application forms + 24 hours for review requests) for Form 2825A submissions and requests for review, and 14.2 hours for Form 2808-R, to estimate the total annual hour burden cost. TSA calculates an average annual hour burden cost of \$3,449 for the LEOSA Application Form 2825A and \$1,286 for the Retired Badge and Credential Application Form 2808-R, for a total average annual cost burden of \$4,735 (\$14,205 over 3 years) for retiring LEOs to provide information to TSA for purposes of this Information collection.

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

<sup>4</sup> These were the average number of Form 2825A and Form 2808-R requests received by TSA over the previous 3 years.

<sup>5</sup> TSA received as many as three requests for review per year for initially rejected Form 2825A's in previous years.

<sup>6</sup> Includes wage or salary and benefits.

<sup>7</sup> Approximately 85 percent of applicants are retired I-band/GS-13 employees, and 15 percent are retired J-band/GS-14 employees. TSA calculates a blended rate based on I-band/GS-13 Step 5 pay rate of  $\$88.39 \times 0.85$  plus J-band/GS-14 Step 5 pay rate of  $\$104.17 \times 0.15 = \$90.76$ . The pay band pay rates were taken from the 2025 TSA Pay Schedule.

There are no cost burdens to respondents or recordkeepers other than those listed in the previous section.

**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 estimates the Federal Government cost by estimating TSA costs for this information collection.<sup>8</sup> TSA estimates that it will take 4.75 hours<sup>9</sup> to process each application and to make an eligibility determination by verifying the information provided in the application. In addition, TSA estimates that 17 percent of LEOSA Form 2825A applications and six percent of the Retired and Credential Form 2808-R applications will be denied, requiring additional processing time for denied applications.<sup>10</sup> TSA estimates 299 applications will be approved and 39 applications will be denied annually, and the time burden to process these applications are  $(4.75 \text{ hours} \times 299) + (8.75 \text{ hours} \times 39) = 1,762 \text{ hours annually, or } 5,286 \text{ hours over } 3 \text{ years}.$

TSA calculates the cost burden by determining how much time is spent by personnel in each pay band processing applications, then multiplying by the hourly loaded wage for each band (See Table 1). TSA calculates the cost of an approved application is \$416, and the cost to process a denied application is \$823).

**Table 1: Cost Burden to Government to Process Applications**

Payband	Time per Accepted Application (hours)	Hourly Loaded Pay Rate per band (\$)	TSA Cost for Accepted Applications	Time per Denied Application (hours)	Hourly Loaded Wage per band (\$)	TSA Cost for Denied Applications
	A	B	C = A x B	D	E	F = D x E
H	2	\$75.94	\$151.88	2	\$75.94	\$151.88
I	2	\$88.39	\$176.78	4	\$88.39	\$353.55
J	0.33	\$104.17	\$34.72	1.33	\$104.17	\$138.90
K	0.25	\$122.27	\$30.57	0.75	\$122.27	\$91.70
L	0.17	\$130.32	\$21.72	0.67	\$130.32	\$86.88
<b>Total</b>	<b>4.75</b>		<b>\$415.67</b>	<b>8.75</b>		<b>\$822.92</b>

<sup>8</sup> This information collection does not place a burden on any other Federal entity.

<sup>9</sup> The office responsible for vetting applications reports that a single application takes 285 minutes (4.75 hours) to process an application.

<sup>10</sup> The Office responsible for vetting applications reports that denied applications receive extra scrutiny and take an additional 240 minutes (4 hours) to process, or a total processing time of 525 minutes (8.75 hours) for denied applications.

TSA multiplies the total approved applications by the cost per approved application, and multiplies the total denied applications by the cost per denied application, then adds the two to determine total annual cost. The annual cost to TSA to process all applications is \$156,379 and the 3 year costs is \$469,136 (See Table 2).

**Table 2: TSA Cost Burden**

<b>Time Period</b>	<b>Total Accepted Applications</b>	<b>Cost Per Accepted Application</b>	<b>Total Cost for Accepted Applications</b>	<b>Total Denied Applications</b>	<b>Cost Per Denied Application</b>	<b>Total Cost for Denied Applications</b>	<b>Total Cost All Applications</b>
	<b>A</b>	<b>B</b>	<b>C = A x B</b>	<b>D</b>	<b>E</b>	<b>F = D x E</b>	<b>G = C + F</b>
<b>Annual</b>	<b>299</b>	<b>\$415.67</b>	<b>\$124,284.82</b>	<b>39</b>	<b>\$822.92</b>	<b>\$32,093.71</b>	<b>\$156,378.53</b>
<b>Three Year</b>	<b>897</b>		<b>\$372,854.47</b>	<b>117</b>		<b>\$96,281.13</b>	<b>\$469,135.60</b>

In addition, TSA estimates it spends 16 hours per request for review, and the reviewer is a J-band employee. TSA uses a fully-loaded wage rate of \$104.17 and multiplies this rate by 3 requests for review × 16 hours = \$5,000.37 annually, or \$15,001 over 3 years. TSA also spends approximately \$1,425 per year on supplies used to create badges. The total annual cost to TSA to process all applications, perform requests for review, and create badges = \$156,379 + \$5,000.37 + \$1,425 = \$162,804 (\$488,412 over three years).

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

There are no program changes or adjustments. However, since the last approval of the Information Collection, the respondents have decreased from 369 to 338.

**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 does not publish the results of this 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 is not seeking such approval.

***18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.***

TSA is not seeking any exceptions to the certification statement.