



**Transportation  
Security  
Administration**

**ACTION**

MEMORANDUM FOR: Dominic J. Mancini  
Deputy Administrator  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget

THROUGH: Antoine McCord  
Chief Information Officer,  
Department of Homeland Security

FROM: Balaji Subramaniam  
Assistant Administrator  
Chief Information Officer  
Authorizing Official (AO)  
Office of Information Technology  
Transportation Security Administration

SUBJECT: Emergency Information Collection Request (ICR):  
Transportation Security Officer Medical Questionnaire (1652-0032)

**Purpose**

The memorandum seeks Office of Management and Budget (OMB) approval of the Transportation Security Administration's (TSA's) request for emergency renewal and revision under the Paperwork Reduction Act (PRA) to OMB Control Number 1652-0032, Transportation Security Officer (TSO) Medical Questionnaire, to address urgent hiring requirements for front-line, mission critical TSO positions.

**Background**

Prior to November 2025, TSO candidate medical evaluations and drug tests were conducted via a competitively sourced contractor utilizing a paper-based Security Officer Medical Questionnaire (SOMQ). During the most recent recompetes of the contract for these medical services, the contract award was protested (solicitation process began in 2024). As a result of repeat contract protests, TSA leadership decided to move TSO candidate medical evaluations to an existing internal government option provided by the Department of Health and Human Services' (HHS) Federal Occupational Health (FOH) division. Unfortunately, in practice this option has proved inadequate to consistently hire appropriate numbers of TSOs for all federalized airports. The geographic medical/clinic network was insufficient to support the hiring needs of the over 440 federalized airports in the US states and territories. The FOH network has limited exam capacity

resulting in excessively long times to schedule and attend medical exams. Additionally, adjudication of completed medical exams by FOH took longer than under the prior contract.

Under the FOH agreement, potential candidates must go to an FOH clinic/affiliate to complete the medical evaluation. Because of the limited number of FOH clinic/affiliates many TSO candidates do not live within a reasonable distance from a clinic/affiliate, often requiring candidates to travel considerable distances, sometimes up to several hundred miles, for an appointment. For example, the lack of FOH facilities in certain geographic regions in Alaska, Montana, and Hawaii, requires multi-hour round-trip drives or flights to larger cities where such facilities are available. In these cases, TSA is losing candidates to alternative employment because candidates are often unwilling to travel an extensive distance for an employment examination.

Even in regions where FOH facilities exist, many candidates are waiting excessively long durations (e.g., longer than 2-3 weeks) for medical appointments due to limited available appointments, which delays TSA’s ability to timely process candidates and prolongs the staffing shortage. TSO candidates are also being lost to other job opportunities due to the extended time frames for hiring.

The table below shares the average processing time in days for TSO candidates to complete the medical evaluation stage of the hiring process under the current FOH agreement versus the prior contract provider. FOH is currently taking more than 150% longer to complete medical evaluation.

<b>Vendors</b>	<b>Days to Complete Medical Stage of Hiring Process</b>
<b>Prior Contract</b>	24.06
<b>FOH</b>	61.96
<b>Variance</b>	<b>37.90</b>

Previously, 100% of eligible TSO candidates were able to schedule a medical exam. Under the current FOH agreement, only 48% of TSO candidates are able to schedule a medical exam due to a lack of medical affiliates and limited convenient appointment slots that match candidate availability. Thus, TSA is losing half of all candidates that advance to the medical stage of the process due to limited FOH capacity. Even if TSO candidates do schedule a medical exam the timeline is longer.

By moving the medical exam process under the HHS FOH medical agreement, TSA was not expecting TSO candidate medical exam processing times to more than double and to only have less than half of all eligible TSO candidates be able to physically schedule medical exams. TSA

could not have known or anticipated that the FOH option would prove to be inadequate. FOH represents that it has a large network of private-provider physicians and nurses, and TSA reasonably believed this would be sufficient to meet TSA's needs. TSA's mission is to protect the nation's transportation systems to ensure freedom of movement for people and commerce. This significant degradation in medical processing and the resulting reduction in qualified TSO candidates for hiring is occurring at a time when TSA needs to be able to staff airport mission critical front-line TSO positions in support of the upcoming peak summer passenger months, FIFA World Cup Soccer, America 250 events, and backfill Officers that separated as a result of the extended funding lapses.

### **Discussion**

TSA risks immediate staffing shortages at airports in a growing number of geographical areas, which could result in airport closure if it is unable to hire TSOs in a more expeditious manner. Standard TSO hiring processing should take 90 days or less (including the medical portion); however, TSA is experiencing delayed processing far exceeding 90-day hiring in markets with a lack of adequate medical facilities and lack of appointment availability. To remedy these significant delays, TSA has developed a new solution for TSO medical evaluations that will allow TSO candidates to access a more extensive geographic network of medical clinics, increase exam capacity for candidates and increase processing speed of medical adjudications. This solution transitions TSO candidate medical evaluations from FOH back to TSA and replaces the paper-based SOMQ, approved under OMB Control Number 1652-0032, with an on-line SOMQ solution for TSO candidates to complete the required medical history questionnaire. In addition, TSA Office of Chief Medical Officer has introduced a TSO Medical Clearance Form, which TSA seeks to add to the current information collection, that TSO candidates will utilize to obtain licensed medical professional input as part of their medical eligibility determinations. The TSO Medical Clearance Form can be completed by any local licensed physician or other health practitioner (e.g., personal physician or health practitioner at an urgent care clinic), thereby greatly increasing the geographic network of physicians or health practitioners that can provide the necessary medical eligibility determination.

Without emergency approval, TSA will risk significant effects to the public's ability to travel if airports are not able to screen passengers because they do not have sufficient front-line TSOs. TSA's inability to timely hire TSOs in the needed numbers will translate to increased checkpoint wait times, longer security lines that pose a safety risk, negative impact on TSO morale as mandatory overtime will be necessary, and traveler frustration due to increased risk of flight impacts. The use of normal PRA clearance procedures is reasonably likely to result in public harm such that TSA would be hindered in its ability to hire TSOs in an expeditious manner using the new online solution and TSO Medical Clearance Form.

### **Conclusion**

TSA respectfully seeks OMB's approval to grant TSA's request for emergency clearance for a revision to TSA's 1652-0032 Transportation Security Officer Medical Questionnaire collection to reflect the online SOMQ and the new TSO Medical Clearance Form. It is imperative that TSA utilize the web tool and this new form to continue mission critical TSO hiring without disruption.

