INFORMATION COLLECTION SUPPORTING STATEMENT

Law Enforcement Officer (LEO) Reimbursement Request
1652-0063

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 110(b) of the Aviation and Transportation Security Act (ATSA) amended 49 U.S.C. 44901 to add a requirement for TSA to order, at a minimum, the deployment of at least one law enforcement officer (LEO) at each airport screening checkpoint and more must be provided based upon passenger volume. Pub. L. 107-71 (115 Stat. 597; Nov. 19, 2001), as codified at 49 U.S.C. 44901. ATSA also transferred the authority in 49 U.S.C. 44903(c) granted to the Federal Aviation Administration to TSA. *See* section 101(f). The Consolidated Appropriations Resolution, 2003, included authorization for TSA to deputize a State or local law enforcement officer to carry out Federal airport security duties. *See* section 351 of Pub. L. 108-7 (117 Stat. 11; Feb. 20, 2003) as codified at 49 U.S.C. 44922. Subsection (f) of this provision includes authority for TSA to permit officers operating under any of these provisions to be stationed at locations other than at the airport screening checkpoint if it is preferable for law enforcement purposes if the LEOs would still be able to provide prompt response to problems occurring at the screening checkpoint. ATSA also granted TSA authority to enter into agreements with airport owner/operators to reimburse expenses they incur for the provision of law enforcement resources to support operations at airport security checkpoints. *See* 49 U.S.C. 114(m). It also granted the TSA Administrator the same authority as the Federal Aviation Administration Administrator under 49 U.S.C. 106(*l*) and (m).

Consistent with these authorities, TSA created the LEO Reimbursement Program. Under this program, TSA enters into Other Transaction Agreements (OTAs) with U.S. commercial airport owner/operators to provide LEO resources. These airports may request partial reimbursement of the costs associated with providing law enforcement support of TSA screening activities. Participation in the LEO Reimbursement program is voluntary. To participate, however, airports must provide information sufficient for TSA to develop the OTA and provide effective oversight of the program. Airport owners/operators must apply for funding by responding to a combined synopsis/solicitation. As part of their request for partial reimbursement, TSA requires airport owner/operators to submit, via TSA Form 3503, *LEO Reimbursement Request Invoice*, their personal contact information, the number of hours spent in law enforcement-related support of TSA screening activities requested for reimbursement, and certification that the number of hours for which reimbursement is requested is truthfully and accurately reported.

In 2024, TSA requested discontinuation of this collection due to the unavailability of appropriations to continue the LEO Reimbursement Program. *See* ICR Reference Number 202109-1652-0005. On April 30, 2026, however, Congress approved funding for the LEO Reimbursement Program as part of the Homeland Security and Further Additional

Continuing Appropriations Act, 2026 (Pub. L. 119-86; 140 Stat. 773). TSA is now requesting the reinstatement of the collection, along with a revision. The revision involves changes to Section I of the form, where TSA is replacing "DUNS" with "UEI," [1] and in Section IV, where TSA will update links and contact numbers.

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 uses the information collected to provide partial reimbursement of costs to airport owner/operators incurred to provide law enforcement support of TSA screening activities and oversight of the LEO Reimbursement Program.

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 provides the LEO Reimbursement Request Invoice form along with the OTA via email to participating airport owners/operators. In compliance with Government Paperwork Elimination Act, participating airport owners/operators complete the form and submit directly to the LE/FAMS LEO Reimbursement Program via email, mail, or in person.

   Usability testing (UX) requirement: Pursuant to a 2023 DHS requirement, all Information Collection Requests must undergo UX prior to submission to OMB. *See* DHS Fiscal Year 2024 Burden Reduction Plan Memorandum, dated September 29, 2023. In 2026, TSA completed a UX of *LEO Reimbursement Request Invoice.* The UX was tested for accuracy of burden and ease of use.

   The UX included four testers, all of whom were TSA employees; three were familiar with the LEO Reimbursement Request Invoice and one was not. The testers familiar with the application completed it more quickly than the testers who were unfamiliar. The participants completed the request in the estimated burden time of an hour. Since the completion time aligned with the current estimated burden of an hour, TSA did not adjust the time burden. In addition, participants found the form easy to use and had no suggestions.

[1] A Unique Entity Identifier (UEI) number is a 12-character alphanumeric code that replaced the Data Universal Numbering System (DUNS) number, which is a unique nine-digit business identifier assigned and managed by Dun & Bradstreet to track commercial entities and build business credit profiles.

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 cannot obtain the information needed to complete a request for reimbursement from any other source. There is no similar information already available that TSA can use for the purpose described in Item 2 above.

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.***

   This collection does not have a significant impact on a substantial number of small businesses. Eligibility to participate in the program is limited to U.S. commercial airport owners/operators and/or State, local, or other public institutions/organizations responsible for commercial airport operations.

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 this collection is not conducted, TSA will not be able to adequately reimburse entities for costs incurred in providing law enforcement support of TSA screening activities, or provide for the appropriate release of federal funds.

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).***

   To implement the statutory mandate discussed above, this collection requires monthly reimbursement submissions. While this monthly frequency is more frequent than the quarterly limit generally permitted under 5 CFR 1320.5(d)(2), it is necessary to fulfill obligations under ATSA.

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 in the *Federal Register* on September 18, 2026 (91 FR 59153), and a 30-day notice on November 20, (91 FR 75342). 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 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.

No assurance of confidentiality is provided to respondents. The Privacy Act of 1974, 5 U.S.C. § 552a, does not apply to this collection as information is not filed and retrieved by personal identifier. However, the collection is covered under a Privacy Impact Assessment (PIA), DHS/ALL/PIA-053 DHS Financial Management Systems (July 30, 2015), and a System of Record Notice, DHS/ALL-007 Accounts Payable System of Record. *See* 83 FR 65705 (December 21, 2018).

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 collect information of a sensitive nature in this collection.

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

Airports requesting reimbursement for law enforcement-related support of TSA screening activities must submit Form 3503, LEO Reimbursement Request Invoice, to TSA on a monthly basis. TSA subject matter experts estimate that an average of 265 airports per year will submit Form 3503 over the next 3 years.[2] Because reimbursement requests must be submitted monthly, TSA expects to receive an average of 3,180 (265 × 12 months) Form 3503s each year. Table 1 summarizes these calculations.

Table 1: Form 3503 Responses

Year	Number of Respondents	Annual Responses per Respondent	Number of Annual Responses
	A	**B**	**C = A × B**
1	250	12	3,000
2	265		3,180
3	280		3,360
Average	265		3,180

[2] TSA subject matter experts estimate that 250 airports will submit forms in year 1 with the number of airports increasing by 15 each year. Previous participation in the program is higher than current estimates (294 in years 2021 – 2023 and 288 in year 2024); however, due to discontinuance of the program and subsequent restarting, TSA anticipates a lower starting respondent population that will increase over time and approach previous levels.

TSA estimates that respondent airports will take approximately 60 minutes (1 hour) to complete each response.[3] This results in an estimated 3,000 burden hours in year 1 (3,000 responses × 1 hour), 3,180 burden hours in year 2 (3,180 × 1 hour), and 3,360 burden hours in year 3 (3,360 responses × 1 hour) which equates to an annual average of 3,180 hours.

To calculate the costs associated with this time burden, TSA uses the hourly wage rate of $30.76 for payroll and timekeeping clerks.[4] TSA accounts for employer-provided benefits (non-salary compensation), by multiplying the hourly wage rate of $30.76 by a compensation load factor of 1.4726.[5] The resulting loaded wage rate equates to $45.30 per hour ($30.76 × 1.4726). When combined with the estimated time burden, it results in an annual average LEO Reimbursement Request time burden cost of $144,054 (3,180 hours × $45.30). Table 2 summarizes these calculations.

Table 2: Public Hour Burden Cost

Year	Number of Annual Responses	Time per Response (Hours)	Annual Burden (Hours)	Annual Hour Burden Cost
	A	**B**	**C = A × B**	**D = C × $45.30**
1	3,000	1	3,000	$135,900
2	3,180	1	3,180	$144,054
3	3,360	1	3,360	$152,208
Average	3,180		3,180	$144,054

[3] Form 3503 requires airports to provide point-of-contact information, bank routing information, a checkpoint log worksheet documenting each day a LEO provided checkpoint coverage and the corresponding hours worked, and information on fringe benefits paid to LEOs. Per instructions included on Form 3503 respondents must also provide supporting documentation demonstrating the actual costs or outlays for services provided by LEOs (e.g., a payroll report, ledger, etc.). Respondents may need to provide an explanation when the information reported on the form cannot be fully certified based on submitted supporting documentation. Supporting documentation is required to certify the billed hours reported on the form. If there is a mismatch between the information provided on the form and the accompanying supporting documentation, the respondent must provide an explanation so the program can make a determination on the final disposition of the form. If the form is incomplete, TSA may contact the respondent airport with follow-up questions. The time burden for follow-up questions is included in the 1-hour burden. The 1-hour burden is in line with usability testing results and represents an average response time with individual airports incurring higher or lower burden (e.g., based on airport size and complexity of the response).

[4] TSA uses the mean hourly wage of a payroll and timekeeping clerks ($30.76). BLS. May 2025 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481100 - Scheduled Air Transportation. Occupation Code 43-3051, Payroll and Timekeeping Clerks. Last modified May 15, 2026 (accessed July 21, 2026) https://data.bls.gov/oes/#/industry/481100/2025.

[5] The compensation factor was calculated by dividing the total compensation for workers in production, transportation and material moving occupations, $38.70, by the wages and salary rate for that group, $26.28, resulting in a compensation factor of 1.4726. Source: BLS – December 2025. Table 5. Employer Costs for Employee Compensation for private industry workers by bargaining and work status. Last modified March 20, 2026. Accessed July 21, 2026. https://www.bls.gov/news.release/archives/ecec_03202026.htm.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There is no cost associated with this collection as 100 percent of the information is submitted electronically.

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 that processing each reimbursement request will take approximately 15 minutes (0.25 hours), resulting in an annual hour burden of 795 hours (3,180 responses per year × 0.25 hours). TSA employees in paybands F - H will be responsible for processing the reimbursement requests. Accordingly, TSA estimates a fully-loaded hourly wage rate of $64.12 by averaging the hourly wage rates of paybands F – H.[6] TSA estimates an annual hour burden cost $50,975 ($64.12 × 795 hours).

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. However, the estimated average annual number of respondents has decreased from 294 to 265 because of an expected lag in reenrollments following the program's reinstatement. Wage rates have also been updated to 2025 values. TSA also updated sections I and IV of Form 3503.

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.

The results of this collection will not 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 displays the expiration date.

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[6] Personnel within TSA, Office of Law Enforcement, Security & Operations Management will complete form reviews. TSA calculates paybands F, G, and H wages using GS 9, 11, and 12 step 5 salary for Washington, D.C. ($79,246, $95,878, and $114,923, respectively). To determine loaded annual salaries, TSA uses internal data to estimate costs for awards, bonuses, personnel benefits, and transit benefits. For paybands F, G, and H these costs totaled $31,008, $36,861, and $43,563, respectively. This results in annual salaries for F-band $110,254 ($79,246 + $31,008), G-band $132,739 ($95,878 + $36,861), and H-band $158,486 ($114,923 + $43,563). Dividing these figures by 2,087 annual hours yields hourly rates for paybands F, G, and H of $52.83, $63.60, and $75.94, respectively, with an average hourly rate of $64.12 (($52.83 + $63.60 + $75.94)/3). See: "Salary Table 2025-DCB," January 2025 (Retrieved May 2026), https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB.pdf.

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 such exception.