



March 27, 2023

Christina A. Walsh  
TSA PRA Officer, Information Technology (IT)  
TSA-11, Transportation Security Administration  
6595 Springfield Center Drive  
Springfield, VA 20598-6011

**Re: Intent to Request Extension From OMB of One Current Public Collection of Information: Law Enforcement/Federal Air Marshal Service Physical and Mental Health Certification.  
OMB Control Number 1652-0043**

Dear Ms. Walsh,

The American Academy of PAs (AAPA), on behalf of the more than 168,300 PAs (physician assistants/associates) throughout the United States, appreciates the opportunity to provide comments on the Department of Homeland Security's (DHS) Transportation Security Administration's (TSA) Federal Air Marshal Service's (FAMS) proposed collection of information. Specifically, AAPA urges the agency to amend forms referenced in the proposed collection of information to authorize PAs to complete and sign the forms.

In the proposed collection of information, TSA references two specific FAMS forms:

- TSA Form 1133-3, Practical Exercise Performance Requirements
- TSA Form 1163, Treating Physician Status Report

AAPA requests that these forms and the TSA's policies be amended to authorize PAs to sign and complete them. This would be in line with revisions made to these forms in 2019, which added advanced practice registered nurses (APRNs) as health professionals authorized to complete and sign the forms.<sup>1</sup> The forms added the following language, "Unless directed by the FAMS Medical Programs Section, this form may be completed by an Advanced Practice Registered Nurse (APRN)." Including APRNs but excluding PAs is in direct contrast to numerous federal healthcare programs that authorize both PAs and NPs to oversee a patient's healthcare and complete health evaluation forms, including Medicare, Medicaid, Tricare, the FEHB Program, Veterans Health Administration, Indian Health Service, Public Health Service, the Department of Education, and the Department of Defense.

In fact, the Centers for Medicare and Medicaid Services attested to the quality of PA education and training stating, "PAs are trained on a medical model that is similar in content, if not duration, to that of physicians.

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<sup>1</sup> 1652-0043-Information Collection Supporting Statement-Law Enforcement/Federal Air Marshal Service Physical and Mental Health Certification 6.3.2019. Available at: <https://omb.report/icr/201906-1652-001/doc/92101701.pdf>.

Further, PA training and education is comparable in many ways to that of APRNs, and in some ways, more extensive.”<sup>2</sup>

PAs are the primary source of care for many patients. According to information provided in an October 2021 Medicare Payment Advisory Commission meeting, in 2018 APRNs and PAs accounted for a third of all primary care clinicians treating Medicare beneficiaries and up to half of primary care clinicians in rural areas.<sup>3</sup> PAs are responsible for more than 400 million patient visits annually. Patients who routinely rely on a PA for their medical care should not have the continuity of their care disrupted by being required to find an NP or physician whom the patient may have never met to complete one of these forms. FAMS employee access to a qualified health professional, and the subsequent collection of required healthcare information, will be enhanced with the ability of PAs to complete and sign the abovementioned forms.

PAs are highly trained and educated health professionals who are well-qualified to assess a patient’s status and complete and sign these forms. Other federal agencies acknowledge the capacity for PAs to complete similar federal agency forms. For example, in 2022 the U.S. Department of Education expanded the list of health professionals who may certify that a student loan borrower is totally and permanently disabled (TPD) to include licensed PAs and NPs. In finalizing that rule, the Department of Education stated that authorizing PAs and NPs to certify TPD discharges was “imperative” to ensuring that loan borrowers were able to “more easily obtain TPD discharges for which they qualify,” particularly in rural and underserved communities.

Simply put, there is no medical or clinical reason to exclude PAs from being able to complete and sign these forms and we request that DHS update its policies to reflect the essential role PAs play in healthcare delivery.

Thank you for the opportunity to provide feedback on the TSA’s Federal Air Marshal Service’s proposed collection of information. For any questions you may have please do not hesitate to contact me at [michael@aapa.org](mailto:michael@aapa.org).

Sincerely,



Michael L. Powe  
Vice President  
Reimbursement and Professional Advocacy

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<sup>2</sup> 81 Fed. Reg. 116, 39452 (June 16, 2016)

<sup>3</sup> <https://www.medpac.gov/wp-content/uploads/2021/11/cong-req-vulnerable-access-medpac-oct-2021.pdf>