

INFORMATION COLLECTION SUPPORTING STATEMENT

Flight Crew Self-Defense Training—Registration and Evaluation

- 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 603 of Vision 100—Century of Aviation Reauthorization Act (Pub.L. 108-176, 117 Stat. 2490, 2563, Dec. 12, 2003) requires TSA to develop and provide a voluntary advanced self-defense training program for flight and cabin crew members of air carriers providing scheduled passenger air transportation. This program, called the Crew Member Self-Defense Training (CMSDT) Program, uses local community colleges to facilitate the provision of self-defense training to flight and cabin crew members. In the course of the program, TSA collects: (1) identifying information from trainees; and (2) feedback from those who have completed the course. For item (1), the only information TSA would require is the following: Name of the Crew Member, Airline Affiliation, Crew Member Airline ID Number, Crew Member FAA Certification Number, Contact Information (mailing address, telephone number and/or email address), and name, city, and State of the Community College where the course was taken. For item (2), trainees would be asked to complete a TSA training evaluation form. Trainees are not required to identify themselves on the evaluation form.

The collection of this information is necessary for TSA to manage and administer the CMSDT program and to allow for efficient use of the funding allocated to the program. The information would allow TSA to determine if a specific local community college is meeting the demands of the trainees. Ensuring that the training provided is of a high quality is critical because the enrollment by crew members is completely voluntary. The goal of the program is to offer this training in a convenient manner to encourage maximum participation. This training adds another critical layer in aviation security.

- 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.***

The information collected will only be used by TSA to determine the progress of the program at various community colleges. TSA is interested in evaluating participation rates by airlines and labor categories (i.e., pilots, navigators, flight attendants) to determine the breadth of the program's effect, as well as to assist TSA in targeting crew members who have not yet participated. In the future, the contact information collected may be used by TSA to inform crew members of any changes in the program, new material that is available, or any TSA website that may be developed to provide more information.

The feedback on training that TSA receives will be used for program management purposes. Specifically, TSA needs trainee feedback to ensure that high-quality training is being delivered at the various locations around the country. TSA is also interested in using such feedback to improve the training curriculum and overall administration of the 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.]***

Because the two collections of information occur during the class itself, the collections will be conducted entirely on paper. As explained below, TSA believes that this method is appropriate given the particular circumstances of this collection and the logistical difficulties of implementing an electronic method of collection.

(1) Collection of identifying information: When trainees arrive for the class, they will be asked to complete a sign-in sheet that contains columns for each item of information TSA needs to collect about trainees. TSA believes that it would not be feasible to collect this information electronically because the lecture portion of the class is likely to be held in a classroom of the community college that does not have computers available for student use. Because this is a self-defense course, the hands-on portion will be held in classrooms or other facilities that are specifically designed for physical activity, such as gymnasiums. TSA also considered having the community colleges collect this information during the enrollment process because some community colleges offer electronic or web-based enrollment systems. However, this would have made it logistically difficult, if not impossible, for TSA to ensure that trainees were provided the burden reduction statement and OMB control number/expiration date at the time their information was collected by the various colleges. Initial classes have shown that crew member enrollment does not ensure their attendance in the program due to various reasons, including being called to duty. By collecting this information on paper at the beginning of each self-defense class, TSA will be able to ensure that each trainee sees the OMB control number and burden reduction statement before providing their information to TSA.

(2) Course Evaluation Form: At the end of the class, TSA will distribute a course evaluation form to all trainees and ask them to complete it before leaving. TSA is requesting feedback at this time because it will encourage a high response rate. As explained above, because this collection will occur in a facility that is not likely to have computers available for student use, TSA believes it is not logistically feasible to offer an electronic method for evaluating the self-defense training.

Consistent with the requirements of the GPEA, TSA will continue to look for opportunities to reduce the burden by using electronic collection, transmission, and storage of data.

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.***

As the information that would be collected relates to CMSDT program enrollment and feedback, this data is not available elsewhere.

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 proposed collection of information does not have a significant impact on a substantial number of small businesses or other small entities.

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, the TSA would not be able to determine the number and location of crew members volunteering for the self-defense training, the airline participation rates, or the labor category participation rates. It would hinder our ability to realign the resources to where the demand by the crew members is the most, and thereby make it difficult to administer the program effectively and make the most efficient use of the funding. It would also hinder TSA's ability to obtain feedback from trainees to identify areas of improvement needed in the training curriculum and program administration.

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).***

The collection will be conducted in a manner consistent with the general information collection guidelines.

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.***

Stakeholders were advised on the nature of the information that will be collected by TSA for this program in several meetings held between TSA, airline representatives, and unions representing pilots and flight attendants.

As required by 5 CFR 1320.8(d), TSA published 60-day notice on April 16, 2008 (73 FR 20699). TSA is not aware of any comments received from affected individuals in response to this 60-day notice.

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

TSA is not providing any payment or gifts to respondent.

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.

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.

No questions of a sensitive nature will be asked during the course of this program.

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

TSA plans to graduate at least 3,000 crew members during each year of the program, unless the demand from crew members reaches a point where TSA elects to expand the program.

Each crew member will have to sign in at the beginning of the class and fill out the TSA Level-1 Evaluation Form at the end of the course; this will amount to 6,000 total responses.

We estimate, at most, 5 minutes per crew member for signing in, as they have to fill out the appropriate information indicated in the questionnaire. This would amount to 3,000 crew members times 5 minutes equals 15,000 minutes or 250 hours (3,000 mbrs X 5 min = 15,000 min [250 hrs]).

We estimate about 10 minutes per crew member to complete the TSA Level 1 Evaluation Form, for a total of 30,000 minutes or 500 hours for all 3,000 crew members (3,000 mbrs X 10 min = 30,000 min [500 hrs]).

We therefore estimate the total annual hours requested to be 750 hours (250 + 500 = 750 hrs).

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

There is no cost imposed on the respondents as a result of this information collection. Community colleges will not charge any fees related to the CMSDT program

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.

The Government cost related to collection of this information for the first year of the program is \$18,250.00. Unless there is a major expansion of the program due to increased demand from crew members, TSA expects these numbers to remain the same for next two to three years. TSA will modify the agreement with its agent, American Association of Community Colleges (AACC), to reflect any increased demand.

TSA has contracted with the AACC to serve as our agent and liaison with the local community colleges that will be conducting the self-defense training. AACC will collect the information described in this application and provide it to TSA. AACC has provided the following breakdown of the costs to the government for these services:

- Contractor Personnel: \$11,250.00 (including salary and benefits and assuming monitoring approximately 100 classes, collecting and reviewing data, and preparing reports)
- Equipment: \$2,500.00 (computer and file space rented during the period of the contract)
- Supplies: \$500.00 (copying, file folders, and mail supplies)
- Other: \$4,000.00 (modem hookups, long-distance phone charges, Xeroxing, etc. during the period of the contract)

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.

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.

There will be no publication of the results of this collection of information.

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 exception to the certification statement in Item 19.