

# INFORMATION COLLECTION SUPPORTING STATEMENT

## REVISION OF A CURRENTLY APPROVED COLLECTION

### TSA CUSTOMER COMMENT CARD

1652-0030

- 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).***

TSA first sought approval from OMB for its Customer Comment Card in 2005. The urgency of initiating a customer comment card was highlighted when TSA changed its screening procedures in September 2004. The circumstances surrounding the bombing of two Russian passenger aircraft led to the addition of limited torso pat-down screening. Feedback received through the TSA Contact Center (TCC), and informally through the airports, was a critical input in revisions to this procedure in December 2004. However, TSA Headquarters staff and TSA airport staff realized that the lack of a comment card made it difficult to ascertain fully the scope and breadth of the feedback, thereby depriving TSA of a critical source of information. Because screening procedures will invariably change again in the future, TSA needs to be able to collect comprehensive feedback in a timely manner and respond appropriately. TSA's goal is to adopt an analytical, collaborative framework to ensure that customer impact is considered when considering changes to operations and policies on customers; this impact can include the treatment of and communication with the customer during direct screening operations. The TSA Customer Comment Card is an important tool in facilitating this goal.

The TCC, however, continues to serve as the main portal of communication for the traveling public. While telephonic contacts are most common, travelers opt to contact the TCC via e-mail to request travel information, file a complaint about a negative travel experience, or share a positive travel experience. With over 750,000 contacts per year, it is crucial for TSA to have the ability to capture this information. As a result of the U.S. Government Accountability Office (GAO) audit on Passenger Screening Complaints<sup>1</sup>, GAO recommended that TSA streamline the methods by which individuals can contact TSA and make those avenues more visible. Additionally, as part of the Deputy Secretary of Homeland Security's initiative to "Improve the Traveler Experience," TSA must facilitate a highly visible, user friendly mechanism by which individuals can contact the agency. Furthermore, upon approval of TSA's 2011 submission of this Information Collection Request (ICR), OMB provided terms of clearance. The terms stated that TSA must explore options to consolidate TSA customer contact methods and consider greater utilization of information technology platforms. Since many people come to the TSA website to obtain travel information, this is the most logical place to provide a means to allow the passenger to contact TSA. The Agency developed a web tool, entitled Talk to TSA (TTT), to serve as a

---

<sup>1</sup> GAO, Air Passenger Screening: Transportation Security Administration Could Improve Complaint Processes, GAO-13-43 (Washington, D.C.: Nov. 15, 2012), <http://www.gao.gov/products/GAO-13-43>.

central portal for customer contact. Permitting electronic submission via this tool eliminates the redundancy in portals into the agency and the fragmented collection of data as a result of the many portals that existed, and will allow the passenger to select the appropriate topic of his or her inquiry, the location, date, and time of the incident if applicable, and provide a description, thus facilitating a quick turnaround. All the above mentioned actions are in support of OMB's terms of clearance, the GAO audit report recommendations, and the Deputy Secretary's initiative.

**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 collects comments on the TSA Customer Comment Card from passenger respondents at airports. Respondents may deposit the comment card in drop-boxes at the airport, return the card to TSA checkpoint supervisors or managers, or mail the card to TSA. Respondents who prefer to submit their comments through electronic means may respond via TTT, which will provide an automated version of the TSA Customer Comment Card. TSA uses the data collected from the responses to prepare Performance Measurement Improvement System (PMIS) reports. TSA personnel at airports are required to prepare daily PMIS reports that include data concerning customer complaints and compliments. PMIS reports are submitted to Headquarters for use in developing measures required by the Government Performance and Results Act (GPRA), which requires all Federal agencies to define performance goals, and measure agency and program performance in the achievement of these goals; the PMIS reports are also used for measuring customer satisfaction. This card enhances the accuracy of the data being reported and places the TSA Customer Service Manager at each airport in a better position to quickly respond to citizens' concerns about TSA operations.

Inquiries, comments, or complaints submitted via TTT will be dispersed and utilized similarly. The data will be used for trend analysis by the Office of Security Operations, as well as other program initiatives within TSA (such as Risk-Based Security) to provide information back to the agency on what information needs to reach passengers, or any problems passengers have encountered. This information will also be used by TSA's Disability and Multicultural Branch of Civil Rights, Liberties, Ombudsman and Traveler Engagement. This will allow that office to follow up on disability-related incidents and claims of civil rights violations. The information obtained via this mechanism will be used to inform the traveling public in various ways, such as top areas of complaints; the most frequently asked questions will be posted on the TSA website.

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.]***

TTT will provide a fully electronic means for the public to provide feedback. A paper version of the Customer Comment Card will continue to be made available at airport locations. TSA's intent is to make the feedback process accessible to all passengers, including those who do not have access to the Internet.

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.***

This information collection will not be a duplication of any existing collections.

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 collection will not have an impact on 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.***

Without this collection, TSA will not have a mechanism for the expeditious daily collection of customer feedback. Such an instrument is needed to facilitate addressing and resolving these concerns as quickly as possible. Inevitably, new security threats will arise that will influence the screening process in the future. While some individuals may continue to mail the comment card, TSA anticipates improved, more immediate utility of data through the TTT portal. This information collection enables TSA to quickly and efficiently gauge public reaction to the changes and respond appropriately, including conducting public education activity.

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.**

TSA published a 60-Day renewal notice in the Federal Register on January 23, 2013 (78 FR 4856), and a 30-Day renewal notice on June 21, 2013 (78 FR 37561). TSA received no comments.

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

The respondents will not be paid for their voluntary participation in the feedback activity.

- 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 assurances of confidentiality to respondents. To the extent applicable, information provided by respondents will be protected in accordance with the Privacy Act and TSA privacy and information technology policy. The applicable system of records notices are DHS/TSA-006, Correspondence and Matters Tracking Records, last published in the Federal Register on April 13, 2010, and DHS/ALL-029 Civil Rights and Civil Liberties Records System of Records, last published in the Federal Register on July 8, 2010.

- 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 that could be considered sensitive are included in this collection.

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

The number of respondents annually via the Customer Comment Card is estimated to be 150,000. TSA estimates that it would take approximately five minutes to complete the card; therefore, the total annual hour burden requested is estimated to be 12,500. The TCC receives approximately 170,000 e-mails annually and anticipates a similar level of response using the online tool which will include the electronic version of the Customer Comment Card. The same time factors are applicable for electronic responses, with an estimated 14,617 burden hours annually. Estimates for submissions regarding civil rights and

disabilities are based on past submissions averaging 750 civil rights complaints and 12 disability complaints per year, each taking an estimated 30 minutes to complete.

Table 1

Type of Contact	Average Annual Respondents	Average Annual Responses per Year	Hour Burden per response	Total Annual Hour Burden
Customer Comment Card	150,000	1	5 minutes	12,500 Hours
Talk to TSA	170,000	1	5 minutes	14,167 Hours
Disability	12	1	30 minutes	6 Hours
Civil Rights	750	1	30 minutes	325 Hours
<b>Total</b>	<b>320,762</b>			<b>26,998 Hours</b>

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

For most respondents the total annual cost burden is \$0. For respondents who chose to mail in the comment card to TSA instead of using the drop-boxes available at airports, the cost would be the price of a postage stamp. Thus, the cost if all respondents chose to mail the comment card would be \$69,000 ( $\$.46 \times 150,000$ ). This cost is likely overstated as TSA assumes most respondents will provide the card to TSA at airports. There are no costs to respondents for online responses via TTT.

**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 estimated annual cost to the Federal Government will be \$25,000 for card printing. These figures were derived by estimating that approximately 500,000 passengers that pass through the checkpoints will take a card from the display stands at those airports who participate in the program. With an estimated printing cost of \$.05 per card, the total annual printing expenses will be \$25,000.

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

Several new response elements were added to the ICR, resulting in a change in the both the number of responses and burden hours associated with this information collection. TSA developed TTT, a central web portal for customer contact in response to GAO audit recommendations, OMB terms of clearance, and initiatives of the Deputy Secretary of Homeland Security. This tool will permit customer feedback through an automated web tool, as well as an electronic means for passengers to submit comments and complaints to the Office of Civil Rights and Liberties.

**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 will not publish this 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 exceptions to the certification statement.