

INFORMATION COLLECTION SUPPORTING STATEMENT

Flight Crew Self-Defense Training-Registration and Evaluation OMB Control Number 1652-0028

- 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 U.S. air carriers providing scheduled passenger air transportation. This program, called the Crew Member Self Defense Training (CMSDT) Program, uses TSA Office of Law Enforcement/Federal Air Marshal Service (OLE/FAMS) local field offices 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), TSA collects the following information at the time of registration: name of the crew member, airline affiliation, crew member airline ID Number, crew member contact information (mailing address, last four digits of the crew member's social security number, telephone number and/or email address), and the city and state of the OLE/FAMS field office where the course will be taken. On attending class, crew members are asked to show one additional ID to verify their identity to registration records.

For item (2), trainees are asked to complete a voluntary 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 allows TSA to determine if a specific local OLE/FAMS field office 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 is used by TSA to determine the progress of the program at various OLE/FAMS field offices. 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. 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.]**

Registration Information: TSA collects registration information electronically, through the website www.tsa.gov/stakeholders/crew-member-self-defense-training-program-locations, when crew members register for CMSDT in advance of the class itself; TSA asks crew members to verify their identity, in person, by completing the CMSDT Program Attendance Roster.

Course Evaluation Form: At the end of the class, TSA distributes a course evaluation form to all trainees and asks them to complete it before leaving. TSA requests feedback at this time because it encourages a high response rate. As explained above, because this collection occurs 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, 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 TSA's ability to realign resources to the locations where crew member demand for training is greatest, 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.***

At the inception of the program, stakeholders were advised on the nature of the information that would be collected by TSA for this program in several meetings held between TSA, airline representatives, and unions representing pilots and flight attendants. TSA will continue to reach out for stakeholder input.

In addition, TSA published two Federal Register notices, with 60 and 30-day comment periods, soliciting comments on the information collection. See 79 FR 53438 (September 9, 2014) and 79 FR 70198 (November 25, 2014). TSA received one comment from the 60-day notice. Mr. Tim Devaney, a news reporter from The Hill, inquired as to the type of self-defense training taught and the intent of the training conducted. TSA's Press Secretary referred him to the Frequently Asked Questions (FAQs) on the TSA.gov website: <http://www.tsa.gov/about-tsa/crew-member-self-defense-training-faqs>.

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 gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

TSA published a SORN on December 10, 2004, (69 FR 71828-71837), and a Privacy Act Assessment was developed on February 6, 2008, to communicate the agency's Privacy Act policy for this collection.

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 1,000 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 completes a registration form either on-line or via telephone, and once attending a class will have to sign in at the beginning of the course instruction. At the end of the course, each participant is asked to complete the voluntary TSA Level-1 Evaluation Form. Altogether this amounts to 2,000 total responses.

TSA estimates, at most, the registration and sign-in process requires 5 minutes per crew member. This amounts to 1,000 crew members times 5 minutes, which equals 5,000 minutes or 83.5 hours (1,000 mbrs X 5 min = 5,000 min [83.5 hrs]).

We estimate about 10 minutes per crew member to complete the TSA Level 1 Evaluation Form, for a total of 10,000 minutes or 166.5 hours for all 1,000 crew members (1,000 mbrs X 10 min = 10,000 min [166.5 hrs]).

We therefore estimate the total annual hours requested to be 250 hours (83.5+166.5 = 250 hrs).

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

There is no cost imposed on the respondents as a result of this information collection.

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 the total annual cost to the government is \$150,000. The following is a breakdown of the costs to the government:

- Instructor Travel: \$22,656
- Hotel Contract of support with instructor training : \$4,500
- Non IT Supplies: \$2,500
- IT Supplies (ink cartridges, batteries, ink: \$300
- Equipment: self-defense training equipment (Body opponent bags) \$17,859
- Employee Verification: \$25,620 (contracted services)
- Training Supplies (Misc. training equipment, certificates, paper, folders, DVD's: \$40,000
- Anticipated carryover: \$36,565

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

Since the previous ICR submission, TSA has added an online registration process, but the number of crew members registering for the training has decreased since the previous submission. Therefore, the burden hours have decreased by 250 hours per year.

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.