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).***

The Transportation Security Administration (TSA) first sought approval from the Office of Management and Budget (OMB) for its Customer Comment Card in 2005. Our initiatives, processes, and procedures are constantly evolving and it is critical to offer an avenue for feedback from the public. Feedback received through the TSA Contact Center (TCC) via the online submission forms, calls, and emails, and feedback from the airports via the paper comment cards provide critical input that we use to make revisions to our procedures. Our screening procedures will continue to change and evolve over time and 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 the impact on the public is considered when we implement or propose changes to operations and policies. The TSA Customer Comment Card is an important tool in facilitating this goal.

The TCC continues to serve as the main portal of communication for the traveling public. The public may contact the TCC via email to request information, file a complaint–general or Civil Rights and Liberties, compliment, or provide general feedback. With over one million 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[1], GAO recommended that TSA streamline the methods by which individuals can contact TSA and make those avenues more visible. Additionally, as part of the Department 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. To that end, we have created several online submission forms that are readily available from the Customer Service portion of tsa.gov. The online forms are easy to use and offer several dropdown menu choices to reduce the burden on the public and increase the quality of data for TSA. Dropdown menus are available for the category of the complaint, compliment, or request for information, airport, airline, date, and time. All the above mentioned actions are in support of OMB's terms of clearance, the GAO audit report recommendations, and the Department's initiative. TCC provides a receipt to any person who submits an online form.

The collection is being revised to include three online submission forms: Request for Assistance at the checkpoint, Request for Information, and to submit a Report of a Security Threat or Vulnerability. This will further support the Department's initiative. The Request for Assistance online form allows passengers to request assistance at the TSA checkpoint as

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[1] 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.

part of the TSA Cares Program. This program was developed for passengers with disabilities, medical conditions, and other special circumstances who may need additional assistance during the security screening process. The program is available to all members of the public and is separate from the Military Severely Injured Joint Support Operations Center (MSIJSOC) and the Travel Protocol Office (TPO) programs which support and facilitate the movement of wounded warriors, severely injured military personnel, veterans and other travelers requiring an escort through the airport security screening process. The Request for Information online form allows passengers to submit an inquiry about TSA policies and procedures such as traveling with medical conditions, prohibited & permitted items, or security screening. The Security Issue online form allows passengers to play a critical role in identifying and reporting suspicious activities and threats. TCC will also provide receipts to any person who uses the three new online forms.[2]

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, or return the card to a TSA employee. Respondents who prefer to submit their comments through electronic means may respond via the online submission forms, which are 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 Support Managers in a better position to quickly respond to citizens' concerns.

Inquiries, comments, or complaints submitted via the online submission forms will be dispersed and utilized similarly. TSA will use the data for trend analysis, with a focus on Civil Rights-related complaints and alleged 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.

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[2] Under 49 CFR 1503.3(a), TSA is required to provide a receipt to any person who reports a security problem, deficiency or vulnerability.

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.]*

The online submission forms, available at www.tsa.gov/contact/contact-forms, 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 use the paper comment card, TSA anticipates improved, more immediate utility of data through the online submission forms. 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 <u>Federal Register</u> 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 September 26, 2017 (82 FR 44836), and a 30-Day renewal notice on November 28, 2017 (82 FR 56259). TSA received one comment. The commenter supports TSA's decision to add an electronic option for Request for Assistance. The commenter believes the electronic version will make it more convenient for passengers with disabilities to request assistance, as they will be able to complete it at their own pace and without having to make a phone call. The commenter requests that TSA ensure the electronic form is compliant with Section 508 of the Rehabilitation Act. In response, TSA notes that it has worked diligently to make TSA.gov accessible and user-friendly for individuals with disabilities and medical conditions. The Request for Assistance form will be compliant with Section 508 of the Rehabilitation Act. The commenter also suggested that TSA include an American Sign Language hotline for deaf and hard of hearing consumers. Persons who are deaf or hard of hearing may use Federal Relay 711 or email to contact TSA. Lastly, the commenter suggested that TSA collect feedback on the passenger's screening experience. The commenter recommended including language on the form to request feedback or to have TSA follow up after the request is made to solicit feedback. TSA agrees with the suggestion to solicit feedback and will add this information to the acknowledgement of the request for assistance that is sent to the requestor.

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 (SORNs) are DHS/TSA-006, Correspondence and Matters Tracking Records, last published in the *Federal Register* on April 13, 2010 (75 FR 18863); DHS/ALL 002, Mailing and Other Lists System, last published in the *Federal Register* on November 25, 2008 (73 FR 71659; and DHS/ALL-029 Civil Rights and Civil Liberties Records System of Records, last published in the *Federal Register* on July 8, 2010 (75FR 39266). A Privacy Impact Assessment (PIA) for the TSA Contact Center is provided by DHS/ALL/PIA-006, General Contact Lists. (June 15, 2017) and the forthcoming TSA Contact Center PIA.

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 and time cost burden of the collection of information.*

TSA estimates the hour burdens and costs to the individual respondents providing comments and civil rights and disability related complaints using customer comment cards or electronic submissions.

Comment Cards

TSA estimates that on average 50,000 individuals will respond via the paper Customer Comment Card on an annual basis. TSA estimates that it would take approximately 5 minutes (0.0833 hours) to complete the card, resulting in an estimated average annual burden of 4,167 hours (50,000 responses x 0.0833333 hours). Table 1 shows the hour burden estimates by year.

Table 1: Total Hour Burden Estimates for Paper Customer Comment Card Submissions				
Year	Respondents (Paper Card)	Average Annual Responses per Respondent	Hour Burden per response	Total Annual Hour Burden
	A	B	C	D = A x B x C
2018 (May - Dec)	33,333.33			2,777.78
2019 (Jan - Dec)	50,000.00			4,166.67
2020 (Jan - Dec)	50,000.00	1	0.083333333	4,166.67
2021 (Jan - Apr)	16,667.67			1,388.89
Average (3 year period)	**50,000.00**			**4,166.67**

Note: Calculations may not be exact due to rounding in the table.

Electronic Submissions

TSA used historic data to estimate the number of responses via electronic submissions (i.e. emails and online tool). TSA estimates that from 2013 to 2016, the average annual rate of change for online submissions was -0.49 percent.[3] TSA applies this annual rate to each preceding year's total number of electronic responses to estimate the following year's total number of electronic responses. The electronic responses include the Security Issue, Request for Information, and the new online form to allow passengers to submit requests for assistance at the TSA checkpoint before they travel. The Request for Information is an online form for passengers to submit a request if they need information about TSA policies and procedures such as traveling with medical conditions, prohibited and permitted items, or security screening. TSA estimates an average of 136,140 emails annually.[4] TSA multiplies the estimated annual average number of electronic submissions by 5 minutes (0.083333333 hours) per submission to get an estimated average annual burden of 11,345 hours

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[3] The -0.49 percent average annual rate of change was determined by calculating the average change in number of comments received for each year from 2014 to 2016.

[4] Three-year average: 136,140.24 respondents = (91,355+136,362+135,694+45,010) ÷ 3.

(136,140.24 responses x 0.083333333 hours). Table 2 displays the estimated burden hours by year.

Table 2: Total Hour Burden Estimates for Electronic Comment Submissions				
Year	Respondents (Electronic Submissions)	Average Annual Responses per Respondent	Hour Burden per Response	Total Annual Hour Burden
	A	B	C	D = A x B x C
2018 (May - Dec)	91,355.24			7,612.94
2019 (Jan - Dec)	136,361.75			11,363.48
2020 (Jan - Dec)	135,693.93	1	0.083333333	11,307.83
2021 (Jan - Apr)	45,009.79			3,750.82
Average (3 year period)	**136,140.24**			**11,345.02**

Note: Calculations may not be exact due to rounding in the table.

TSA uses historic data to estimate an annual rate of change based on the number of civil rights and disability submissions between 2013 to 2016. The annual rate of change during this data period was 62.4 percent.[5] Using this data, TSA estimates an average of 17,519 civil rights and disability complaints annually.[6] TSA estimates 10 minutes (0.1667 hours) for the civil rights and disability submissions, with an estimated average annual burden of 2,920 hours (17,518.58 responses x 0.166666667 hours). Table 3 displays the estimated hour burdens by year.

Table 3: Total Hour Burden for Civil Rights and Disability Submissions				
Year	Respondents (Civil Rights and Disability)	Average Annual Responses per Year	Hour Burden per response	Total Annual Hour Burden
	A	B	C	D = A x B x C
2018 (May - Dec)	5,509.95			918.32
2019 (Jan - Dec)	13,426.01			2,237.67
2020 (Jan - Dec)	21,809.98	1	0.166666667	3,635.00
2021 (Jan - Apr)	11,809.80			1,968.30
Average (3 year period)	**17,518.58**			**2,919.76**

Note: Calculations may not be exact due to rounding in the table.

TSA estimates the total annual burden of 18,431 hours by adding the average annual hour burdens for comment cards, 4,167 hours (Table 1), emails and online tool, 11,345 hours (Table 2), and civil rights and disability submissions, 2,920 hours (Table 3). TSA multiplies this total average annual hour burden by a fully loaded hourly wage rate of $35.28[7] to

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[5] The 62.4 percent annual rate of change was determined by calculating the average change in the number of Civil Rights and Disability complaints received each year from 2013 to 2016. For the 2017 total, TSA estimates 5,087.8, based on the total of 3,132 in 2016 (3,132 x (1+62.4%).

[6] Three-years average, 17,518.58. = (5,510+13,426+21,810+11,810) ÷ 3.

[7] For all workers in the private nonfarm economy, except those in private households, and workers in the public sector, except the Federal government total compensation, is $35.28. Source: BLS Economic News Release, Employer Costs for Employee Compensation March 2017 (for Release June 9, 2017). Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by major occupational and industry group. https://www.bls.gov/news.release/pdf/ecec.pdf. Release date: June 9, 2017. Retrieved June 16, 2017.

estimate an average annual hour burden cost of $650,262 for purposes of this Information Collection Request (ICR) (18,431.45 hours x $35.28 compensation rate). Table 4 provides the cost estimate for each year.

Table 4: Respondent Hour Burden Cost		
Year	Total Annual Hour Burden	Total Annual Hour Burden Cost
	A	B = A x $35.28
2018 (May - Dec)	11,309.04	$398,982.88
2019 (Jan - Dec)	17,767.81	$626,848.48
2020 (Jan - Dec)	19,109.49	$674,182.86
2021 (Jan - Apr)	7,108.00	$250,770.40
Average (3 year period)	**18,431.45**	**$650,261.54**

Note: Calculations may not be exact due to rounding in the table.

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

TSA assumes all respondents submitting paper customer comment cards will provide the card to TSA at airports. There are no costs to respondents for online responses via the online submission forms.

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 hour burdens and costs to the Federal Government based on the type of submission and whether the Federal Government uses a contractor or Federal employee to review and respond to customer comments.

(a) Hour Burden Estimation

Comment Cards

TSA estimates that it takes a Federal employee 5 minutes (0.0833 hours) to review comments on a paper card. TSA multiplies 50,000 average annual paper card responses by 0.083333333 hours to obtain an annual burden estimate of 4,167 hours for the Federal government (or TSA) to review comments on paper cards. Paper comment cards are only reviewed by a Federal employee because they are turned in at the airport and do not go to the TSA Contact Center (TCC), where both contractors and Federal employees review all electronic submissions. Table 5 shows the TSA hour burden estimate for comment cards.

Table 5: TSA Hour Burden for Comment Cards			
Year	Average Annual Responses	Hour Burden per Response (Federal Employee)	Total Annual Hour Burden (Federal Employees)
	A	B	C = A x B
2018 (May - Dec)	33,333.33		2,777.78
2019 (Jan - Dec)	50,000.00		4,166.67
2020 (Jan - Dec)	50,000.00	0.083333333	4,166.67
2021 (Jan - Apr)	16,667.67		1,388.89
Average (3 year period)	**50,000.00**		**4,166.67**

Note: Calculations may not be exact due to rounding in the table.

Electronic Submissions

TSA estimates that each electronic submission (via emails and online tool) takes 5 minutes (0.0833 hours) for a contractor and 30 seconds (0.0083 hours) for a Federal employee to review. The Federal employee takes less time because he or she is merely looking at the TSA Comment Card to determine if it contains a security threat. The contractor (TCC agent) takes more time because the review process involves reading the electronic submission, selecting the appropriate template response, and sending it back to the passenger. TSA multiplies 136,140.24 average annual responses by 0.08333333 hours to obtain an estimated annual burden of 11,345 hours for contractors. TSA multiplies 136,140.24 average annual responses by 0.0083333333 hours to obtain an annual burden estimate of 1,135 hours for Federal Government employees. Table 6 shows the TSA hour burden estimate for electronic submissions.

Table 6: TSA Hour Burden for Electronic Comment Submissions Tool					
Year	Annual Responses (Electronic Submissions)	Hour Burden per Response (Contractor)	Total Annual Hour Burden (Contractors)	Hour Burden per Response (Federal Employee)	Total Annual Hour Burden (Federal Employees)
	A	B	C = A x B	D	E = A x D
2018 (May - Dec)	91,355.24		7,612.94		761.29
2019 (Jan - Dec)	136,361.75		11,363.48		1,136.35
2020 (Jan - Dec)	135,693.93	0.083333333	11,307.83	0.008333333	1,130.78
2021 (Jan - Apr)	45,009.79		3,750.82		375.08
Average (3 year period)	**136,140.24**		**11,345.02**		**1,134.50**

Note: Calculations may not be exact due to rounding in the table.

TSA estimates that each civil rights and disability-related comment submission takes 5 minutes (0.0833 hours) for a contractor and 30 seconds (0.0083 hours) for a Federal employee to review. The Federal employee takes less time because he or she is merely looking at the TSA Comment Card to determine if it contains a security threat. The contractor (TCC agent) takes more time because the review process involves reading the electronic submission, selecting the appropriate template response, and sending it back to the passenger. TSA multiplies 17,518.58 average annual responses by 0.08333333 hours to

obtain an annual burden estimate of 1,460 hours for contractors. TSA multiplies 17,518.58 average annual responses by 0.0083333333 hours to obtain an annual burden estimate of 146 hours for Federal Government employees. Table 7 shows the TSA hour burden estimate for civil rights and disability related comments.

Table 7: Civil Rights and Disabilities Related Comments TSA Hour Burden					
Year	Annual Responses (Civil Rights and Disability)	Hour Burden per Response (Contractor)	Total Annual Hour Burden (Contractors)	Hour Burden per Response (Federal Employee)	Total Annual Hour Burden (Federal Employees)
	A	B	C = A x B	D	E = A x D
2018 (May - Dec)	5,509.95		459.16		45.92
2019 (Jan - Dec)	13,426.01		1,118.83		111.88
2020 (Jan - Dec)	21,809.98	0.083333333	1,817.50	0.008333333	181.75
2021 (Jan - Apr)	11,809.80		984.15		98.41
Average (3 year period)	**17,518.58**		**1,459.88**		**145.99**

Note: Calculations may not be exact due to rounding in the table.

(b) Hour Burden Costs

To estimate the annual hour burden costs for contractors, TSA multiplies the total contractors hour burden by the fully loaded average hourly wage of $25.92[8] for contractors. To estimate the annual hour burden costs for Federal Government employees who review comment cards, TSA multiplies the total Federal employees hour burden by the fully loaded average hourly wage of $32.21[9] for Federal D-H band employees. To estimate the annual hour burden costs for Federal Government employees who process electronically submitted comments, TSA multiplies the total Federal employees hour burden by the fully loaded average hourly wage of $51.01[10] for Federal G-I band employees.

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[8] TSA assumes that a contractor's loaded hourly average wage rate is equivalent to the loaded hourly average wage rate of a D band TSA employee. TSA obtains the loaded total annual compensation from TSA's Office of Finance and Administration FY18 Modular Cost. The loaded total annual compensation for a D band (GS 5-6-7) TSA employee is $53,917.75, and TSA divides by 2,080 annual hours to estimate a loaded hourly average wage of $25.92.

[9] TSA calculated a D-H rate by averaging the loaded D band (GS 5-6-7) wage rate and loaded G/H-band (GS 9-11-12) wage rate. TSA obtained the loaded wages from the Office of Finance and Administration FY Modular Cost. The annual loaded wage rate for D band (GS 5-6-7) was $53,917.75 and the annual loaded wage rate for G/H band (GS 9-11-12) was $80,069.19. TSA then divided each annual rate by 2080, to get a D band (GS 5-6-7) hourly wage rate of $25.92 and a G/H band (GS 9-11-12) hourly wage rate of $38.49, which sum to $64.41. This amount was then divided by 2 to get a blended hourly wage of $32.21.

[10] TSA calculated a G-I rate by averaging the loaded G/H-band (GS 9-11-12) wage rate and loaded I-band (GS 13) wage rate. TSA obtained the loaded wages from the Office of Finance and Administration FY Modular Cost. The annual loaded wage rate for G/H-band (GS 9-11-12) was $80,069.19 and the annual loaded wage rate for I-band (GS 13) was $132,115.17. TSA then divided each annual rate by 2080, to get a G/H-band (GS 9-11-12) hourly wage rate of $38.49 and an I-band (GS 13) hourly wage rate of $63.52, which sum to $102.01. This amount was then divided by 2 to get a blended hourly wage of $51.01.

Comment Cards

TSA estimates an estimated annual cost of $2,500[11] to the Federal government for printing comment cards. TSA estimates that Federal employees spend an annual average of 4,167 hours processing comment cards, resulting in a total annual hour burden cost of $134,202. TSA also estimates that the total annual printing and hour burden cost for comment cards is $136,702 ($2,500 + $134,202). Table 8 shows the total hour burden cost estimate for comment cards.

Table 8: Printing and Hour Burden Cost for Comment Cards (Federal Employees)					
Year	Number of Comment Cards	Comment Card Printing Cost	Total Annual Hour Burden (Comment Card)	Total Annual Hour Burden Cost (Comment Card)	Total Annual Printing and Hour Burden Cost (Comment Card)
	A	B = A × $0.05	C	D = C × $32.21	E = B + D
2018 (May - Dec)	33,333.33	$1,666.67	2,777.78	$89,467.78	$91,134.44
2019 (Jan - Dec)	50,000.00	$2,500.00	4,166.67	$134,201.67	$136,701.67
2020 (Jan - Dec)	50,000.00	$2,500.00	4,166.67	$134,201.67	$136,701.67
2021 (Jan - Apr)	16,666.67	$833.33	1,388.89	$44,733.89	$45,567.22
Average (3 year period)	**50,000**	**$2,500.00**	**4,166.67**	**$134,201.67**	**$136,701.67**

Note: Calculations may not be exact due to rounding in the table.

Electronic Submissions

TSA estimates that contractors spend an annual average of 11,345 hours for processing electronically submitted comments and 1,135 hours for processing electronically submitted complaints related to civil rights and disability. TSA estimates an annual hour burden cost of $294,086 for processing public comments and $29,409 for complaints related to civil rights and disability, resulting in a total annual hour burden cost of $323,494 for contractors. Table 9 shows the total hour burden cost estimate for contractors.

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[11] TSA assumes the number of comment cards printed for each year is equal to the number of respondents in each year. According to a TSA subject matter expert, it costs $0.05 to print a comment card.

Table 9: Hour Burden Cost for Electronic Submissions (Contractors)					
Year	**Customer Comments**		**Civil Rights and Disability Related Comments**		**Total Annual Hour Burden Cost (Contractors)**
	Total Annual Hour Burden	**Total Annual Hour Burden Cost**	**Total Annual Hour Burden**	**Total Annual Hour Burden Cost**	
	A	B = A × $25.92	C	D = C × $25.92	E = B + D
2018 (May - Dec)	7,612.94	$197,342.51	761.29	$19,734.25	$217,076.77
2019 (Jan - Dec)	11,363.48	$294,564.07	1,136.35	$29,456.41	$324,020.47
2020 (Jan - Dec)	11,307.83	$293,121.46	1,130.78	$29,312.15	$322,433.61
2021 (Jan - Apr)	3,750.82	$97,228.64	375.08	$9,722.86	$106,951.50
Average (3 year period)	**11,345.02**	**$294,085.56**	**1,134.50**	**$29,408.56**	**$323,494.12**

Note: Calculations may not be exact due to rounding in the table.

TSA estimates that Federal employees spend an annual average of 1,460 hours for processing electronically submitted comments and 146 hours for processing electronically submitted complaints related to civil rights and disability. TSA estimates an annual hour burden cost of $74,463 for processing public comments and $7,446 for complaints related to civil rights and disability, resulting in total annual hour burden cost of $81,909 for Federal employees. Table 10 shows the total hour burden cost estimate for Federal employees.

Table 10: Hour Burden Cost for Electronic Submissions (Federal Employees)					
Year	**Customer Comments**		**Civil Rights and Disability Related Comments**		**Total Annual Hour Burden Cost (Federal Employees)**
	Total Annual Hour Burden	**Total Annual Hour Burden Cost**	**Total Annual Hour Burden**	**Total Annual Hour Burden Cost**	
	A	B = A × $51.01	C	D = C × $51.01	E = B + D
2018 (May -Dec)	459.16	$23,419.96	45.92	$2,342.00	$25,761.95
2019 (Jan - Dec)	1,118.83	$57,067.09	111.88	$5,706.71	$62,773.80
2020 (Jan - Dec)	1,817.50	$92,703.07	181.75	$9,270.31	$101,973.38
2021 (Jan - Apr)	984.15	$50,197.40	98.41	$5,019.74	$55,217.15
Average (3 year period)	**1,459.88**	**$74,462.51**	**145.99**	**$7,446.25**	**$81,908.76**

Note: Calculations may not be exact due to rounding in the table.

TSA estimates that the annual hour burden cost to the Federal Government as a result of this ICR is approximately $542,105. Table 11 shows the total hour burden cost estimate for TSA.

Table 11: TSA Total Hour Burden Cost				
Year	Total Annual Printing and Hour Burden Cost (Comment Card)	Total Annual Hour Burden Cost (Contractors)	Total Annual Hour Burden Cost (Federal Employees)	Total Annual Hour Burden Cost for TSA
	A	B	C	D = A+B+C
2018 (May - Dec)	$91,134.44	$217,076.77	$25,761.95	$333,973.16
2019 (Jan - Dec)	$136,701.67	$324,020.47	$62,773.80	$523,495.94
2020 (Jan - Dec)	$136,701.67	$322,433.61	$101,973.38	$561,108.65
2021 (Jan - Apr)	$45,567.22	$106,951.50	$55,217.15	$207,735.87
Average (3 year period)	**$136,701.67**	**$323,494.12**	**$81,908.76**	**$542,104.54**

Note: Calculations may not be exact due to rounding in the table.

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 online submission forms with multiple dropdown menu options in response to GAO audit recommendations, OMB terms of clearance, and initiatives of the Deputy Secretary of Homeland Security. The forms will permit customers to submit feedback and Civil Rights and Liberties comments and complaints electronically. These online submission forms include the Security Issue, the Request for Information, and the form to allow passengers to submit requests for assistance at the TSA checkpoint before they travel.

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.