

INFORMATION COLLECTION SUPPORTING STATEMENT

Crew Member 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).**

TSA is required 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. See 49 U.S.C. 44918(b). 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 currently collects: (1) identifying information from trainees; and (2) feedback from those who have completed the course.

First, for identifying information, TSA collects the following information at the time of registration: name of the crew member, airline affiliation, position, crew member airline identification (ID) number, crew member contact information (home mailing address, last four digits of the crew member's social security number (SSN), home 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 required to show ID to verify their identity to registration records and to sign the class attendance roster.

Second, for feedback, 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 also 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 to protect lives should an incident occur.

TSA is making a number of revisions to this Information Collection Request (ICR). First, TSA is changing the name of the collection from "Flight Crew Self-Defense Training-Registration and Evaluation" to "Crew Member Self-Defense Training-Registration and Evaluation." The revision is more consistent with the statutory requirement in 49 U.S.C. 44918(b), as amended by sec. 603 of Vision 100--Century of Aviation Reauthorization Act (Vision 100) (Pub.L. 108-176, 117 Stat. 2490, 2563, Dec. 12, 2003), which refers to "flight and cabin crew members of U.S. air carriers providing scheduled passenger air transportation." Furthermore, TSA has expanded the program to allow voluntary participation by air carriers providing cargo air transportation. Second, TSA will no longer collect the last four digits of the SSN from crew members. Third, TSA is updating the

attendance roster to add a “training complete” column and to remove the “Day 1-3” and “2nd ID #” columns. Fourth, TSA will include in the collection an electronic Injury Waiver Form. Each flight crew member will be required to complete an electronic Injury Waiver Form during the registration process or before the training is conducted. This collection involves obtaining the employee’s airline, airline identification number, signature, and date to limit liability to TSA or its facilities should a crew member become injured during the training curriculum. Finally, TSA will replace the evaluation form with an electronic feedback tab. At the completion of the course, participants may assess the quality of the training by clicking on the electronic feedback link to provide their anonymous and voluntary comments.

- 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, provide new material that is available, or publicize any TSA website that may be developed to provide more information. The contact information is also used to send a “Certificate of Completion” to the crew member upon successful completion of the CMSD program.

The Injury Waiver Form will be used to limit liability issues to TSA or their training facilities should any injuries occur during the conduct of the training curriculum.

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.

Injury Waiver Form: This form is sent electronically to the crew member along with the Letter of Instruction five days prior to the beginning of training at the field office. They are instructed to complete the required information and print the form to sign and date it. The form must be presented to the CMSD instructor at the field office prior to the start of training. The field office maintains blank copies of the Injury Waiver Form for crew members who arrive without the form or do not have the ability to print this form.

Feedback/Evaluation Form: At the end of the class, the crew members have the option of returning to the CMSD registration page to submit any positive or negative comments on the training, electronically, through a feedback tab located on the page. Crew members are not required to identify themselves on this evaluation tab and any comments are considered voluntary. Submitted comments will be used by the CMSD Program Manager to improve the training curriculum and overall administration of the program. TSA requests feedback at this time because it encourages a high response rate.

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. Without the Injury Waiver Form, TSA could be held liable for any injuries that occur to the crew member as a result of the training.

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 82 FR 58433 (Dec. 12, 2017) and 83 FR 17422 (April 19, 2018). TSA received no comments from the notices.

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.***

The information collection is covered under a Privacy Impact Assessment (PIA), DHS/TSA/PIA-014 Crew Member Self Defense Training Program (February 6, 2008); and a System of Records Notice, DHS/All-003 - Department of Homeland Security General Training Records. See 73 FR 71656 (Nov. 25, 2008).

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 and cost burdens of the collection of information.***

Based on participation of the last three (3) years, TSA estimates the total annual hour and cost burden for this information collection to be 595 hours and \$22,185.05 respectively.

TSA estimate it will enroll 3,400 and graduate at least 1,700 crew members during each year of this training program. For enrollment, each crew member completes an online registration form and all attendees, at the beginning of the course, signs an Injury Waiver Form and the class roster. At the end of the course, each participant is asked to return to the CMSD registration page to submit comments regarding the training course electronically using the “Feedback” tab.

TSA estimates, the online registration requires five (5) minutes and the injury waiver and class roster sign-in process requires one (1) minute per crew member. This amounts to 311.67 hours [(3,400 crew members x 5 minutes) + (1,700 crew members x 1 minute)].

Although utilizing the course Feedback tab is strictly voluntary, TSA estimates ten (10) minutes per crew member for those who complete the evaluation. Assuming everyone participates, this amounts to a total of 283.33 hours (1,700 crew members x 10 minutes).

TSA estimate the total annual hours for this information collection to be 595 hours (311.67 + 283.33). Based on the last three (3) years of participation, TSA estimate that of the total enrollees/graduates of this training course, there are 6% Pilots, 93% Flight Attendants, and 1% Other Flight Crew. Therefore, TSA estimate the total annual cost of this information collection to be \$22,185.05 [(595 x 0.06 x \$98.42¹) + (595 x 0.93 x \$33.26²) + (595 x 0.01 x \$44.88³)].

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.

Based on participation during the last three (3) years, TSA estimates the total annual cost to the Federal Government for this information collection to be \$253,306.47. Following is the breakdown of the costs to the Federal Government:

- TSA maintains a 5:1 students to instructor ratio and all instructors are TSA I band employees for a total cost of instructors of \$83,272.80: [(1,700/5) x 4 hours x \$61.23⁴ per hour].
- TSA estimate it will take the CMSD Program Manager, a J band TSA employee, five (5) minutes to review/respond to the registration forms and ten (10) minutes to collect, screen and store the Injury Waiver Forms and review the post training feedback for each crew

¹Loaded hourly wage rate for Airline Pilots from the US Bureau of Labor Statistics, May 2016 <https://www.bls.gov/oes/2016/may/oes532011.htm>; \$204,712 per year (includes a load factor of 34%).

²Loaded hourly wage rate for Flight Attendants from the US Bureau of Labor Statistics, May 2016 <https://www.bls.gov/oes/2016/may/oes532031.htm>; \$69,171 per year (includes a load factor of 34%).

³Loaded hourly wage rate for Other Flight Crew from the US Bureau of Labor Statistics, May 2016 https://www.bls.gov/oes/current/naics4_481100.htm#00-0000; \$93,344 per year (includes a load factor of 34%).

⁴Loaded hourly wage rate for TSA I band personnel located at TSA HQ in Arlington, VA; \$127,787 per year (includes 27.1% locality adjustment and a load factor of 28.11%). Source: TSA Financial Management Division.

member at a total cost of \$42,233.67: [(3,400 crew members x 5 minutes) + (1,700 crew members x 10 minutes)] x \$74.53⁵ per hour.

- Instructor travel: \$25,000.
- Hotel contract of support with instructor training: \$15,000.
- Non-IT supplies: \$2,500.
- IT supplies (ink cartridges, batteries, ink: \$300.
- Equipment, self-defense training equipment (body opponent bags): \$18,000.
- Employee verification, contracted services: \$27,000.
- Training supplies (misc. training equipment, certificates, paper, folders, DVDs, etc.): \$40,000.

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 injury waiver form and replaced the evaluation form with an electronic feedback tab, 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.

TSA has added the Injury Waiver Form to the registration process. The Program Office has also eliminated the paper critique form and replaced it with an electronic voluntary feedback tab located on the CMSD registration page to receive any evaluation comments.

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.

⁵Loaded hourly wage rate for TSA J band personnel located at TSA HQ in Arlington, VA; \$155,544 per year (includes 27.1% locality adjustment and a load factor of 28.11%). Source: TSA Financial Management Division.