

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

**TSA Customer Comment Tools  
OMB Control Number 1652-0030  
Exp. 4/30/2022**

- 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. TSA's 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 used to make revisions to TSA's procedures. TSA's 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 implementing or proposing changes to operations and policies. The TSA Customer Comment tools are critical 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 or phone 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<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 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, request for assistance, request for information, or security issue. All the above mentioned actions are in support of OMB's terms of clearance and the GAO audit report recommendations. TCC provides a receipt to any person who submits an online form.<sup>2</sup>

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<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>.

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

## **INFORMATION COLLECTION SUPPORTING STATEMENT**

**TSA Customer Comment Tools**  
**OMB Control Number 1652-0030**  
**Exp. 4/30/2022**

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.**

Respondents may submit their feedback through electronic means via the online submission forms, which serve as the primary TSA Customer Comment Tool. Currently, there are four options for online forms: complaint and compliment, request for assistance, request for information, and security issues. The option to file a civil rights complaint is within the general complaint form. TSA collects feedback on the physical paper TSA Customer Comment Card from passenger respondents at airports. Respondents may request paper TSA Customer Comment Cards to provide feedback, complaints, or compliments. For passengers who deposit their cards in the designated drop-boxes, TSA staff at airports collect the cards, categorize comments, enter the results into an online system for reporting, and respond to passengers as appropriate. If the passenger voluntarily provides contact information, TSA will use the contact information to respond to passengers as appropriate.

TSA is revising the information collection from four to six online forms. The Complaint and Compliment online form has been broken into two forms. Additionally, TSA PreCheck® has been pulled out of the drop down menu of Complaint and given its own form. Finally, the Request for Assistance online form has been renamed TSA Cares. The 6 online forms are as follows:

- Complaint – passengers may provide a complaint indicating why TSA did not meet their expectations.
- Compliment – passengers may share how TSA exceeded their expectations.
- TSA PreCheck® - passengers may share concerns about not receiving TSA PreCheck on their boarding pass or other concerns.
- Request for Information – passengers may submit a request for information about TSA policies and procedures, such as traveling with medical conditions, prohibited & permitted items, security screening, and more.
- TSA Cares – passengers may submit a request for assistance through the TSA screening checkpoint.
- Security Issue – passengers may identify and report suspicious activities and threats.

Also, TSA is changing the name of OMB control number 1652-0030 from “*TSA Customer Comment Card*” to “*TSA Customer Comment Tools*” to more accurately represent the information collection. TSA is also making non-substantive changes to the paper comment card, by updating font, TSA insignia, and spacing.

The TSA Customer Service Branch uses the data collected to prepare reports for TSA senior leadership and for reporting to other Federal agencies on TSA’s customer experience work, such as OMB. The internal reports are used to develop measures required by the Government Performance and Results Act (GPRA), which requires all Federal agencies to define

# INFORMATION COLLECTION SUPPORTING STATEMENT

TSA Customer Comment Tools  
OMB Control Number 1652-0030  
Exp. 4/30/2022

performance goals, and measure agency and program performance in the achievement of these goals; the reports are also used for measuring customer satisfaction. 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. These feedback tools enhance the accuracy of the data being reported and places TSA in a better position to quickly respond to citizens' concerns.

- 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](http://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 be made available at airport locations upon request. 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

## **INFORMATION COLLECTION SUPPORTING STATEMENT**

**TSA Customer Comment Tools  
OMB Control Number 1652-0030  
Exp. 4/30/2022**

influence the screening process in the future. 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 April 13, 2021 (86 FR 19276), and a 30-Day renewal notice on July 13, 2021 (86 FR 36758). The agency 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 (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.

# INFORMATION COLLECTION SUPPORTING STATEMENT

TSA Customer Comment Tools  
OMB Control Number 1652-0030  
Exp. 4/30/2022

**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 6,950 individuals will respond via the paper Customer Comment Card on an annual basis. TSA estimates that it would take approximately 5 minutes (0.08333 hours) to complete the card, resulting in an estimated average annual burden of 579 hours. Table 1 shows the hour burden estimates by year.

**Table 1: Total Hour Burden Estimates for Paper Customer Comment Card Submissions**

	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
Annual Average	6,950	1	0.08333	579

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). With the revision of the information collection, the electronic responses now include the Compliment, Complaint, Security Issue, Request for Information, TSA PreCheck, and TSA Cares forms. TSA estimates that from 2017 to 2019, it received an average of 76,739 of these electronic submissions annually. TSA multiplies the estimated annual average number of electronic submissions by 5 minutes (0.08333 hours) per submission to get an estimated average annual burden of 6,395 hours. Table 2 displays the estimated burden hours.

**Table 2: Total Hour Burden Estimates for Electronic Comment Submissions**

	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

## INFORMATION COLLECTION SUPPORTING STATEMENT

### TSA Customer Comment Tools OMB Control Number 1652-0030 Exp. 4/30/2022

Annual Average	76,739	1	0.08333	6,395
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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 2017 to 2019. Using this data, TSA estimates an average of 4,663 civil rights and disability complaints annually. TSA estimates 7 minutes (0.1167 hours) for the civil rights and disability submissions, with an estimated average annual burden of 544 hours (4,663 responses x 0.1167 hours). Table 3 displays the estimated hour burdens by year.

**Table 3: Total Hour Burden for Civil Rights and Disability Submissions**

	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
Annual Average	4,663	1	0.1167	544

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

TSA estimates the total annual burden of 7,518.07 hours by adding the average annual hour burdens for comment cards (Table 1), emails and online tool (Table 2), and civil rights and disability submissions (Table 3). TSA multiplies this total average annual hour burden by a fully loaded hourly wage rate of \$38.60<sup>3</sup> to estimate an average annual hour burden cost of \$290,198 for purposes of this Information Collection Request (ICR).

**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.

<sup>3</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>.

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 December 2020). 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. Data as of December 2020, Released March 18, 2021.

[https://www.bls.gov/news.release/archives/ecec\\_03182021.htm](https://www.bls.gov/news.release/archives/ecec_03182021.htm)

# INFORMATION COLLECTION SUPPORTING STATEMENT

**TSA Customer Comment Tools**  
**OMB Control Number 1652-0030**  
**Exp. 4/30/2022**

**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 (0.08333 hours) to review comments on a paper card. TSA multiplies 6,950 average annual paper card responses by 0.08333 hours to obtain an annual burden estimate of 579.17 hours for TSA to review comments on paper cards. TSA applies a wage rate of \$48.24<sup>4</sup> to calculate the annual hour burden cost. 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 4 shows the TSA annual hour cost burden estimate for comment cards.

**Table 4: TSA Hour Burden for Comment Cards**

	Average Annual Responses	Hour Burden per Response	Annual Hour Burden (Federal Employees)	Annual Hour Burden Cost
	A	B	C = A × B	D = C × \$48.24
Annual Average	6,950	0.083333	579.17	\$27,939.50

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 (0.08333 hours) for a contractor and 30 seconds (0.00833 hours) for a Federal employee to review. The Federal employee takes less time because he or she is only 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 76,739 average annual responses by 0.08333 hours to obtain an estimated annual burden of 6,395 hours, then multiplies that amount by a wage rate of \$25.81<sup>5</sup> to get the annual contractor cost for electronic submissions. TSA multiplies 76,739 average annual responses

<sup>4</sup> The federal employee reviewing the cards could be a Pay band G, H, or I level employee, so TSA calculates a blended wage rate of \$28.78 + \$43.21 + \$72.73 = \$48.24.

<sup>5</sup> The contractor wage rate is equivalent to a Pay band D TSA employee.

## ***INFORMATION COLLECTION SUPPORTING STATEMENT***

**TSA Customer Comment Tools**  
**OMB Control Number 1652-0030**  
**Exp. 4/30/2022**

by 0.00833 hours to obtain an annual burden estimate of 639.5 hours, then multiplies that amount by a wage rate of \$48.24<sup>6</sup> to get the annual cost for federal government employees. Table 5 shows the TSA hour burden costs for electronic submissions.

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<sup>6</sup> See footnote 5.



**INFORMATION COLLECTION SUPPORTING STATEMENT**

**TSA Customer Comment Tools  
OMB Control Number 1652-0030  
Exp. 4/30/2022**

**Table 5: TSA Hour Burden for Electronic Comment Submissions**

	<b>Annual Responses</b>	<b>Hour Burden per Response (Contractor)</b>	<b>Total Annual Hour Burden (Contractor)</b>	<b>Annual Hour Burden Cost for Contractor</b>	<b>Hour Burden per Response (Federal Employee)</b>	<b>Total Annual Hour Burden (Federal Employee)</b>	<b>Total Annual Hour Burden Cost (Federal Employee)</b>	<b>Total Annual Hour Burden Cost (Contractor plus Federal Employee)</b>
	<b>A</b>	<b>B</b>	<b>C = A × B</b>	<b>D = C × \$25.81</b>	<b>E</b>	<b>F = A × E</b>	<b>G = F × \$48.24</b>	<b>H = D + G</b>
Annual Average	76,739	0.083333	6,394.9	\$165,052	0.008333	639.49	\$30,849.49	\$195,901

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

*Civil Rights and Disabilities Related Comments Submissions*

TSA estimates that each civil rights and disabilities-related comment submission takes 5 minutes (0.08333 hours) for a contractor and 30 seconds (0.00833 hours) for a federal employee to review. The Federal employee takes less time because he or she is only 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 4,663 average annual responses by 0.08333 hours to obtain an annual burden estimate of 388.6 hours for contractors, then multiplies that amount by a wage rate of \$25.81 to get the annual hour burden cost for contractors for civil rights and disabilities related comments. TSA multiplies 4,663 average annual responses by 0.0083 hours to obtain an annual burden estimate of 38.9 hours for federal government employees, then multiplies that amount by a wage rate of \$48.24 to get the annual hour burden cost for federal government employees for civil rights and disabilities related comments. Table 6 shows the TSA hour burden estimate for civil rights and disability related comments.

**INFORMATION COLLECTION SUPPORTING STATEMENT**

TSA Customer Comment Tools  
 OMB Control Number 1652-0030  
 Exp. 4/30/2022

**Table 6: Civil Rights and Disabilities Related Comments TSA Hour Burden**

	<b>Annual Responses</b>	<b>Hour Burden per response (Contractor)</b>	<b>Total Annual Hour Burden (Contractor)</b>	<b>Annual Hour Burden Cost for Contractor</b>	<b>Hour Burden per Response (Federal Employee)</b>	<b>Total Annual Hour Burden (Federal Employees)</b>	<b>Total Annual Hour Burden Cost (Federal Employee)</b>	<b>Total Annual Hour Burden Cost (Contractor plus Federal Employee)</b>
	<b>A</b>	<b>B</b>	<b>C = A x B</b>	<b>D = C × \$25.81</b>	<b>E</b>	<b>F = A x E</b>	<b>G = F × \$48.24</b>	<b>H = D + G</b>
Annual Average	4,663	0.083333	388.58	\$10,028.13	0.0083333	38.9	\$1,874.56	\$11,902.69

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

# INFORMATION COLLECTION SUPPORTING STATEMENT

## REVISION OF A CURRENTLY APPROVED COLLECTION

### TSA CUSTOMER COMMENT TOOLS

1652-0030

#### Printing Costs for Comment Cards

TSA estimates an estimated annual cost of \$347.50<sup>7</sup> to the Federal government for printing comment cards.

The total annual cost of this collection to the federal government is \$27,939.50 + \$195,901.49 + \$11,902.69 + \$347.50 = \$236,091.18.

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

There have been no program changes or adjustments. However, TSA has moved from 4 to 6 online forms. These online submission forms, as discussed in the response to Question 2, include the Complaint, Compliment, TSA PreCheck, Request for Information, TSA Cares, and Security Issue.

**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.

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<sup>7</sup> 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.