

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 by 49 U.S.C. 44918(b), as amended,¹ 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. The Crew Member Self Defense Training (CMSDT) Program uses TSA's Law Enforcement/Federal Air Marshal Service (LE/FAMS) local field offices to facilitate the provision of self-defense training to flight and cabin crew members. Using local field offices to offer training provides multiple, convenient locations to encourage maximum participation, which is essential because this training adds another critical layer in aviation security to protect lives should an incident occur. To operate this program, TSA currently collects: (1) required identifying information from trainees for registration, identity verification, and attendance; (2) a required form regarding liability for injuries; and (3) voluntary feedback from those who have completed the course.

First, TSA collects the following identifying information at the time of registration: name of the crew member, airline affiliation, position, crew member airline identification (ID) number, crew member contact information (mailing address, telephone number and/or email address), and the city and state of the LE/FAMS field office where the course will be taken. Upon attending class, crew members are asked to show two forms of ID to verify their identity to registration records and to sign the class attendance roster. Two forms of identification include an airline ID and a driver's license or passport.

Second, TSA requests each crew member to complete an Injury Waiver Form during the registration process, or before the training is conducted. The Injury Waiver Form requests the employee's airline, airline ID number, signature, and date, and is intended to limit any liability to TSA or its facilities should a crew member become injured during the training. If a crew member refuses to complete an Injury Waiver Form, the training will be denied.

Third, trainees are asked to complete a voluntary evaluation of the training upon completion of the course. Participants may assess the training quality and provide anonymous and voluntary comments by clicking on the electronic feedback link located on the registration site. 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

¹ On May 16, 2024, Congress enacted the FAA Reauthorization Act of 2024 (H.R. 3935) (Public Law 118-63; 138 Stat. 1025). Sec. 427, Crewmember Self-Defense Training, amends 49 U.S.C. 44918. This section requires TSA in consultation with the Federal Air Marshal Service and the Aviation Security Advisory Committee to establish minimum standards for crew member self-defense training, within 180 days after the date of the bill's enactment. TSA is currently working to implement the provisions of this statutory requirement.

TSA also offers this training to cargo and private and public charter flight crew members.

information also allows TSA to determine if a specific local LE/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.

- 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 identify information collected is used by TSA to register attendees, validate the identity of crew members who receive the training, confirm participation in training through a class roster, and determine the progress of the program at various LE/FAMS field offices through attendee evaluations. The LE/FAMS field office CMSDT instructors may also use contact information to inform participants, prior to training, of any specific information relating to their field offices, i.e., exact location in a building, parking details, building access procedures, as well as, determining eligibility to participate. Additionally, 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 CMSDT Program. TSA uses the information to evaluate 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 (95.5 percent of the respondents come from the airlines who create a roster of participants and 4.5 percent from individual respondents).

The Injury Waiver Form will be used to document an attendee’s acknowledgment of the limited assumption of risk and a waiver of the government’s liability in conjunction with the attendee’s participation in the CMSDT Program.

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.]**

Identifying Information: TSA collects registration information electronically, through the website <https://www.tsa.gov/for-industry/training/crew-member-self-defense>, 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 5 days prior to the beginning of training at a LE/FAMS field office. They are requested to complete the required information and print the form to sign and date it. The form must be presented to the CMSDT instructor at the field office prior to the start of training. Although completion is voluntary, failure to complete the form may result in the attendee's inability to participate in the CMSDT Program. 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: At the end of the class, the crew members have the option of returning to the CMSDT 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 received are considered voluntary. Submitted comments will be used by the CMSDT Program Manager to improve the training curriculum and overall administration of the program. TSA requests feedback because it encourages a high response rate.

Consistent with the requirements of the *Government Paperwork Elimination Act*, TSA will continue to look for opportunities to reduce the burden by using electronic collection, transmission, and storage of data.

Usability Study Requirement: Pursuant to a new DHS requirement, all Information Collection requests must undergo usability testing prior to submission to OMB. See Paperwork Reduction Act Burden Reduction Initiative Memorandum dated, March 22, 2022. TSA completed a usability study on TSA Form 3417, *CMSDT Program Attendance Roster*. The purpose for the study was to determine whether the questions use plain language and are easily understood and to check time to complete the form for accountability purposes. The study included four participants. The participants completed the form electronically. TSA found that the average time to complete the form for the participants was 5 minutes, which corresponds to the current estimated time burden. Participants reported the electronic form was very easy to understand and complete. Based on the participant's feedback, TSA did not make any changes to the form or the burden.

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. Without the Injury Waiver Form, TSA could be held liable for any injuries that occur to the crew member because of the training. Failure to collect the feedback and evaluation information 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 89 FR 44696 (May 21, 2024) and 89 FR 73700 (September 11, 2024). 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.

The annual number of respondents to the collection is 795, where 300 airlines providing the class rosters, plus the 495 individual crew members providing information directly to TSA for the LE/FAMS field office classes. Based on training data from 2021-2023,² TSA estimates the total annual hour and cost burden for this information collection to be 61.17 hours and \$2,878, respectively.

TSA estimates it will enroll and graduate 11,000 crew members during each year of this training program. Of these, TSA estimates 95.5 percent (10,505) of the training occurs at airline training centers, while 4.5 percent (495) occurs at LE/FAMS field offices. For training at an airline training center, a roster with crew members' information is provided to TSA by the airline. For training at a LE/FAMS field office, each crew member completes an online registration form and all attendees, at the beginning of the course, sign an Injury Waiver Form and the class roster. At the end of the course, each participant is asked to return to the CMSDT registration page to submit comments regarding the training course electronically using the "Feedback" tab.

TSA estimates, the online registration for those who receive training at a field office requires 5 minutes and the injury waiver and class roster sign-in process requires 1 minute, thus 0.1 hours per crew member (1 + 5 minutes = 6 minutes = 0.1 hours). This amounts to 49.5 hours (11,000 crew members x 0.045 x 0.1 hours).

For those who receive training at an airline training center, there is no individual registration, injury waiver, or class sign-in to complete. Class rosters are created by the airline hosting the training. TSA estimates there will be 300 training events provided at airline training centers annually, and each class roster takes 2 minutes (0.033333 hours) for the airline to create. This amounts to 10 hours (300 x 0.033333).

Although utilizing the course Feedback tab is voluntary, TSA estimates 10 minutes per crew member for those who complete the evaluation. TSA has received less than 10 evaluations during the last 3 years, annually 3.3333 evaluations. TSA estimates that 10 crew members

² TSA observed a significant decline in this program in 2020, when training was halted due to the coronavirus pandemic. Therefore, data from 2020 was not used in creating estimates for this information collection.

will complete the evaluation each year. This amounts to approximately 1.67 hours (10 x 0.166666 hours = 1.67 hours).

TSA estimates the total annual hours for this information collection to be 61.17 hours (49.5 + 10 + 1.67). Based on the last 3 full years of participation, TSA estimates that of the total enrollees/graduates of this training course, 1.7% were Pilots, 96.3% Flight Attendants, and 2% Other Flight Crew. Table 1 displays a breakdown of the training by occupation.

Table 1: Trained/Enrolled by Occupation

Year	Total Flight Crew Enrolled/Trained	Number of Pilots Enrolled/Trained	Number of Flight Attendants Enrolled/Trained	Number of Other Enrolled/Trained
	A	B = A x 1.7%	C = A x 96.3%	D = A x 2%
Annual	11,000	187	10,593	220

Therefore, TSA estimates the total annual cost of this information collection to be \$2,878:
LE/FAMS field office

- [(187 x 0.045 x 0.1 hour x \$95.62 pilot hourly compensation³) +
- (10,593 x 0.045 x 0.1 hour x \$49.18 flight attendant hourly compensation⁴) +
- (220 x 0.045 x 0.1 hour x \$173.25 other hourly compensation (airline pilots, copilots, and flight engineers)⁵) +

Airline training centers

- (300 x 0.03333 x \$28.22 airline clerical worker hourly compensation⁶).

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.

³Loaded hourly wage rate for Airline Pilots from the US Bureau of Labor Statistics, April 2024 <https://www.bls.gov/oes/current/oes532012.htm>; (\$138,010 x 1.441188782 compensation factor) ÷ 2080 hours = \$95.62.

⁴Loaded hourly wage rate for Flight Attendants from the US Bureau of Labor Statistics, April 2024 <https://www.bls.gov/oes/current/oes532031.htm>; (\$70,980 x 1.441188782 compensation factor) ÷ 2080 hours = \$49.18.

⁵Loaded hourly wage rate for Other Flight Crew from the U.S. Bureau of Labor Statistics, April 2024 <https://www.bls.gov/oes/current/oes532011.htm>; (\$250,050 x 1.441188782 compensation factor) ÷ 2080 hours = \$173.25.

⁶ Loaded hourly wage for Scheduled Air Transportation File Clerks from the U.S. Bureau of Labor Statistics, April 2024 <https://www.bls.gov/oes/current/oes434071.htm>; (\$40,730 x 1.441188782 compensation factor) ÷ 2080 hours = \$28.22.

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 3 years, TSA estimates the total annual cost to the Federal Government for this information collection to be \$7,539.11. TSA estimates it will take the CMSDT Program Manager, a J-band TSA employee, 5 minutes to review/respond to the registration form and 5 minutes to collect, screen and store the Injury Waiver Form for each crew member who registers online and review the post training feedback at a total cost of \$7,539.11: [(495 crew members x 0.0833 hour) + (495 crew members x 0.0833 hour)] x \$91.38⁷ per hour.

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 Information Collection Request submission, TSA has been conducting most (95.5 percent) of this training at airline training centers. This has eliminated the need for individuals to enroll online, as the airlines provide a roster of their employees participating in the course. This also eliminated the need for Injury Waiver forms, as training at airline training centers is on airline property, not federal government property. Individual enrollments and Injury Waiver forms are now done only when training occurs at LE/FAMS field offices. Use of the Feedback tab occurs at the LE/FAMS field offices and not at the airline training centers. As a result, the response to the Feedback tab has reduced significantly as few individuals provide comments. TSA also removed costs that were not directly attributable to the information collection in Item 14.

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.

⁷Loaded hourly wage rate for TSA J band personnel located at TSA HQ in Springfield, VA; \$190,717 per year (includes 30% locality adjustment and non-pay benefits such as health insurance and retirement)). Source: TSA Financial Management Division.