

INFORMATION COLLECTION SUPPORTING STATEMENT

Department of Homeland Security Traveler Redress Inquiry Program

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 Department of Homeland Security Traveler Redress Inquiry Program (DHS TRIP) was developed as a voluntary program by DHS, in cooperation with the Departments of State (DOS) and Justice (DOJ), to provide a one-step portal for individuals to request redress. Persons may seek redress if they believe that they have been (1) denied or delayed boarding; (2) denied or delayed entry into or departure from the United States at a port of entry; (3) identified for additional (secondary) screening at our Nation's transportation hubs, including airports, seaports, train stations, and land borders; and (4) otherwise been subjected to violations of their civil rights or privacy rights while boarding, entering, or being screened in connection with travel. Responsibility for the execution of DHS TRIP lies within the Office of Transportation Security Redress in the DHS Transportation Security Administration (TSA). Section 114(f) of Title 49 of the United States Code gives TSA the authority to assess threats to transportation, and in accordance with this authority TSA serves as the Executive Agent and is charged with implementation of this program. The DHS TRIP Office provides traveler redress intake and processing support, while working with relevant DHS components, the Department of State, and law enforcement and intelligence agencies to review the submissions and reach a determination about traveler status. Components include, but are not limited to, the DHS Office for Civil Rights and Civil Liberties (CRCL), DHS Privacy Office (PRIV), TSA, U.S. Citizenship and Immigration Services (USCIS), U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and U.S. Visitor and Immigration Status Indicator Technology Program (US-VISIT). DHS TRIP external program partners include the Federal Bureau of Investigation Terrorist Screening Center (TSC) along with the Department of State Bureau of Consular Affairs (DoS). The collection of information includes: (1) a modification to the existing Traveler Inquiry Form (TIF) – the form that the applicant completes to begin the redress process and (2) an optional customer satisfaction questionnaire to allow the public to provide DHS with feedback on their experience using DHS TRIP.¹ TSA is conducting a customer satisfaction survey in accordance with the DHS Office of the Inspector General, *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program*. Recommendation #24 of the report called upon DHS TRIP to “collect and report on redress-seeker impressions of the TRIP website, different aspects of the redress experience, and their overall satisfaction with the program, with the aim of using this information to identify areas for improvement.”

¹ A previous information collection request (ICR) for the Traveler Inquiry Form was submitted as required when the DHS Traveler Redress Inquiry Program was launched on February 20, 2007. This ICR incorporates by reference the previous one.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for new collection, indicate the actual use the agency has made of the information received from the current collection.

The DHS TRIP Office will use this information to process redress requests, and to analyze customer satisfaction when using the redress application process. Redress applicants include persons believe they have been (1) denied or delayed boarding, (2) denied or delayed entry into or departure from the United States at a port of entry, (3) identified for additional screening at our Nation's transportation hubs, and (4) otherwise subjected to violations of their civil rights or privacy rights while boarding, entering, or being screened in connection with travel.

This collection consists of modifying the Traveler Inquiry Form (TIF) by adding an optional question that asks applicants to categorize the frequencies of their travel. DHS TRIP will use this collection to assist in prioritizing the processing of cases to support the redress of the most frequent travelers. Separately, DHS will request that applicants for redress complete a customer satisfaction survey following the completion of the TIF or after they have received a response letter signaling the end of the redress process. This anonymous ten-question survey requests that applicants score various aspects of the redress process on a 1-5 scale, where 1 is very unsatisfied and 5 is very satisfied. Because this survey is anonymous, personally identifiable information (PII) will not be collected.

The association between PII collected on the TIF on one hand and information regarding the frequency of travel on the other, is necessary to identify the specific circumstances surrounding the traveler's request for redress. It will also be useful to assist in prioritizing and making more efficient and effective the overall use of DHS TRIP's resources. Frequent travelers more than likely generate multiple applications for redress, and are most likely to be incorrectly denied boarding or entry or are incorrectly subjected to additional screening and/or perceived violations of privacy. Travelers may be detained for other reasons involving Watch List initiatives, other security procedures can apply, there may have been a change in status and the clearance process varies by component. Information provided about the event(s) which precipitated the redress request and about frequency of travel, as well as about customer satisfaction, will assist DHS in coordinating among its components to resolve the request expeditiously, thereby preventing future travel difficulties and enhancing overall customer satisfaction.

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.

DHS has developed an online system to support the DHS-wide redress program called DHS TRIP. In compliance with the Government Paperwork Elimination Act (GPEA),

individuals can download the TIF on the DHS TRIP website at <http://www.dhs.gov/trip>. Under this program, individuals can complete the TIF online, but are required to submit, government issued travel documents via email or mail. Individuals who are U.S. citizens can submit a legible copy of an unexpired U.S. passport. If the individual does not have a U.S. passport, he/she can provide at least one legible copy of an unexpired government-issued photograph bearing identification document. For minors (individuals under the age of 18), a copy of either a certified birth certificate or a passport is the only identification document required. For persons who do not possess a U.S. passport or who are non-U.S. citizens, they may submit a copy of the following: Passport; Passport Card; Driver's license; Government identification Card (Federal/State/Local number); Birth certificate (only for individuals under the age of 18); Military Identification Card; Certificate of Citizenship; Naturalization Certificate; Immigrant/non-immigrant Visa; Alien Registration Card; Petition or Claim receipt; I-94 Admission Form; FAST Card; SENTRI Card; NEXUS Card; Border Crossing Card; or SEVIS Card.

If desired, an individual may print the TIF and submit the completed form, along with at least one unexpired government-issued photograph bearing identification document via mail or email. All new redress requestors are directed to the DHS TRIP website, which is intended to be the primary point of contact with individuals who feel they have been (1) denied or delayed boarding, (2) denied or delayed entry into or departure from the United States at a port of entry, (3) identified for additional screening at our Nation's transportation hubs, including airports, seaports, and land borders, and (4) otherwise subjected to violations of their civil rights or privacy rights while boarding, entering, or being screened in connection with travel. Based on current trends, DHS expects that 80% of travelers seeking redress will submit their initial requests electronically, with 70% of these redress seekers submitting identifying documents by email and 30% submitting the documents by regular mail. For individuals with limited access to computers or the Internet, the TIF form is available by contacting the TSA Contact Center and DHS TRIP Program Office will send the form by mail.

The customer satisfaction survey will be accessed and completed through the DHS TRIP website following completion of the TIF and for others, the survey will be sent by mail with the instructions to complete only that portion applicable to the traveler's experience.

DHS TRIP is replacing its Case Management System by March 31, 2011, in order to be more efficient and to provide faster service to the traveling public. It will also reduce the number of contacts between the public and DHS TRIP and thus will reduce the amount of time required to complete the application. Lastly, the new case management system will further DHS TRIP's goal of becoming a paperless operation.

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.

There is no similar information available within DHS that can be used or modified for this program. This information is collected on a one-time basis from individuals requesting redress. In the context of DHS TRIP, DHS has not heretofore collected information as to travel frequency or customer satisfaction. Existing information within the possession of DHS does not address these questions.

5. Describe any special impact on small businesses.

This collection does not have a significant impact on a significant number of small businesses.

6. Describe the consequences 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.

One objective of DHS TRIP is to “accelerate efforts to establish a government-wide traveler screening redress process to resolve questions if travelers have been incorrectly selected for additional screening.” Submission of this form is a critical element of this process. If DHS were not to conduct this information collection, it would not be able to provide an accelerated and effective redress process for individuals who believe they have been incorrectly delayed or denied boarding as a result of the passenger screening process. Furthermore, if customers were not surveyed to determine the ease of the redress application process and whether the redress process met their expectations, DHS would be unable to ascertain whether modifications to DHS TRIP support the DHS objective of enhancing quality customer service. By collecting information about travel frequency, DHS TRIP will be able to prioritize the resolution of redress requests from travelers who travel most frequently. DHS anticipates a quick reduction in the backlog of redress requests, preventing the need for future redress requests from travelers who can be cleared, avoiding a duplication of effort while allowing DHS to enhance customer satisfaction and overall improvement in its provision of services to the traveling public. Moreover, by administering a customer satisfaction survey, DHS will be better prepared to make meaningful and substantive modifications to DHS TRIP to effectuate this objective. Both outcomes are consistent with Recommendation #24 from the DHS Office of the Inspector General, which in its *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program* called upon DHS TRIP to “collect and report on redress-seeker impressions of the TRIP website, different aspects of the redress experience, and their overall satisfaction with the program, with the aim of using this information to identify areas for improvement.”

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).

This collection is conducted in a manner consistent with the general information collection guidelines.

8. Describe the 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 those comments. Specifically address comments received on cost and hour burden.

To implement DHS TRIP, an advisory board was established with representation from DHS Office of Policy (PLCY), US-VISIT, CRCL, TSA, CBP, USCIS, ICE, PRIV, DoS, Department of Commerce, and the Terrorist Screening Center. Additionally, a working group was established with representatives from the agencies above to make improvements to the underlying system and identify necessary information that needs to be collected to conduct an effective redress program. Former DHS Secretary Michael Chertoff designated TSA as the "Executive Agent" for DHS TRIP.

TSA, on behalf of DHS, published a 60 day notice in the Federal Register on May 19, 2010 and a 30 day notice on August 26, 2010, as required by 5 C.F.R. § 1320.8(d) and received no comments. Prior to deployment of DHS TRIP, TSA received several calls about when the TRIP website would be operational. Additionally, the DHS Office of the Inspector General recommended in Recommendation #24 of its *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program* that DHS collect additional data to document, report, and take steps to improve redress-seekers' impressions of the DHS TRIP website, different aspects of the redress experience, and overall satisfaction with DHS TRIP.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is provided to respondents.

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

No specific assurances of confidentiality are provided to individuals. Information contained in the redress request is provided by applicant. Information provided by individuals will be protected from disclosure to the extent appropriate under applicable provisions of the *Freedom of Information Act*, the *Privacy Act of 1974*, and, as applicable, 49 U.S.C. 114(s), as implemented by 49 C.F.R. part 1520, which limits the disclosure of Sensitive Security Information. Data is collected and transmitted in accordance with the Privacy Act. Individuals are advised of these statutory protections at the time of the submission of the application for redress.

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.

This collection does not include any questions of a sensitive nature.

12. Provide estimates of hour burden of the collection of information.

Based on current contact volumes, DHS receives approximately 30,000 redress requests per year. The annual response population was derived from data compiled from across all participating components (TSA, CBP, ICE, US-VISIT, CRCL, PRIV, TSC, and DoS). This estimate reflects the combined average number of cases received by each participating component extrapolated from the past six months of experience. While the DHS components receive many more inquiries or contacts, the redress applicant is not required to submit documentation unless the claim is determined to meet the threshold for review. Prior to DHS TRIP, not all participating components enabled travelers to submit inquiries or cases online. DHS expects, as DHS TRIP is further utilized, the volume of cases received by participating components will increase. Familiarity with the program's existence by foreign nationals; the launch of the TSA Secure Flight Program; and other Watch Listing initiatives created in the aftermath of the 12/25 Incident caused a substantial increase in the overall utilization of the program. Currently, our volume with respect to intake is approximately 30,000 requests for redress per year.

(For example, since the baseline established pre-October 2009, requests for redress submitted to DHS TRIP have increased over 100%).

Travelers seeking redress must complete and submit the TIF, under penalty of perjury, either electronically, via mail, or via web portal to DHS TRIP along with a copy of their U.S. Passport or at least one unexpired government-issued photograph bearing identification document. DHS estimates completing the form, and gathering and submitting the information will take approximately one hour. DHS estimates that completing a single additional question as to travel frequency as part of the completion of the TIF, along with a customer satisfaction survey will take approximately 10 minutes. Thus, the total estimated annual number of burden hours for passengers seeking redress is 72,330, calculated as follows: 62,000 applicants x 1.1666 hours = 72,330 hours. [This assumes that the annual number of passengers seeking redress will be approximately 100% greater than prior to the post-December 25, 2009 expansion of watch lists].

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

DHS estimates the total annual cost burden for travelers appealing to DHS TRIP to be approximately \$21,731. The costs to passengers will involve costs associated with mailing the TIF and identity documentation. Because DHS TRIP enables customers to submit identity documents via email, standard mail, or web portal, not all respondents will bear the cost of mailing documentation. It is estimated that the cost to mail the

documentation is \$.75 via regular mail. Based on the current volume of forms received by TSA, it can be assumed that 20% of applications to DHS TRIP will be sent via standard mail that 40% will be received via email, and that 40% will be submitted via the website. The estimated annual burden for mailing the submission is \$9,300, calculated as follows: 62,000 applicants x .2 x \$.75 = \$9,300.

Applications sent through the website must be accompanied with a signed Traveler Inquiry Form acknowledgement page, along with identifying documentation. TSA expects that the population of respondents who submit online will exhibit different behavior than the general population and will provide the additional documentation via web portal 70% of the time, via mail 10% of the time, and via email 20% of the time. The online applicants are expected to submit documentation in this manner based upon their demonstrated proclivity to use electronic communication methods. TSA assumes that applicants who provide their identity documentation via email have free access to scanning capabilities. Those without scanning or email capabilities would face an estimated annual burden of \$4,650, calculated as follows: 62,000 applicants x (.1) x \$.75 = \$ \$4,650.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and account for other expenses that would not have been incurred without this collection of information.

Below are the DHS TRIP current expenses - FY10 Costs (New Case Management System). The expense is \$503,000 annualized over a 3 year period.

Cost Component	Amount
RMS System Upgrade *	\$1.4M
DHS Web Content Management Configuration	\$10,000
Operations & Maintenance Upgrade	\$0
Certification & Accreditation	\$100,000
Total	\$1.51M

* New Case Management System
Recurring Annualized expenses.

Cost Component	Amount
RMS System Upgrade	\$0
DHS Web Content Management Configuration	\$0
Operations & Maintenance Upgrade**	\$500,000
Certification & Accreditation	\$20,000

Total	\$520,000
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** Hosting Ops \$50K, Applications Maintenance/Post initial Case Management System Development Application Upgrades \$450K

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

TSA is proposing to add a customer satisfaction questionnaire to the collection in light of the DHS Office of the Inspector General Recommendation #24 of its *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program* that DHS collect additional data to document, report, and take steps to improve redress-seekers' impressions of the DHS TRIP website, different aspects of the redress experience, and overall satisfaction with DHS TRIP.

DHS has also adjusted the burden estimates based on increased numbers of individuals seeking redress as compared to the estimate TSA provided in its previous ICR. DHS expects, as DHS TRIP is further utilized, the volume of cases received by participating components will increase. (For example, since the baseline established pre-October 2009, requests for redress submitted to DHS TRIP have increased over 100%).

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.

The results of the proposed collection will not be published.

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.

DHS is not seeking approval not to display the expiration date of OMB approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

No exceptions are claimed.