

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **TSA Pre✓™ Application 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).**

Under the statutory authorities explained below, TSA is implementing an enrollment program to become eligible for TSA Pre✓™ expedited screening program. Section 109(a)(3) of the Aviation and Transportation Security Act (ATSA), Pub. L. 107-71 (Nov. 19, 2001, codified at 49 U.S.C. § 114 note) provides the Transportation Security Administration (TSA) with the authority to “establish requirements to implement trusted passenger programs and use available technologies to expedite security screening of passengers who participate in such programs, thereby allowing security screening personnel to focus on those passengers who should be subject to more extensive screening.” In addition, TSA has express, unlimited statutory authority to establish and collect a fee for any registered traveler program by publication of a notice in the Federal Register, as outlined in the Department of Homeland Security Appropriations Act, 2006, Pub. L. 109-90 (Oct. 18, 2005).

TSA Pre✓™ is a passenger prescreening initiative for low risk passengers who are eligible to receive expedited screening at participating U.S. airport security checkpoints. TSA Pre✓™ is one of several expedited screening initiatives that TSA is implementing. TSA Pre✓™, as well as the larger set of expedited screening initiatives, enhances aviation security by permitting TSA to better focus its limited security resources on passengers who are more likely to pose a threat to civil aviation, while also facilitating and improving the commercial aviation travel experience for the public. Travelers interested in enrolling in the TSA Pre✓™ application program can go to [www.tsa.gov](http://www.tsa.gov) to begin the pre-enrollment process and/or make an appointment at an enrollment center to complete enrollment or enroll entirely in-person.

TSA will use the information provided to conduct a security threat assessment of the individual. Travelers determined to present a low risk to the aviation transportation system will receive a “Known Traveler Number” pursuant to this initiative. They will be eligible for expedited screening at U.S. airports with TSA Pre✓™ lanes for five years. After five years, those eligible and who wish to continue participating in the program will need to re-enroll by submitting another application which includes paying the associated fee, providing biographic information, identity documents as well as a new set of fingerprints. This expedited screening may permit such travelers to leave on their shoes, light outerwear and belts, as well as leave laptops and 3-1-1 compliant liquids in carry-on bags. TSA also retains the authority to perform random screening on travelers authorized to receive expedited physical screening. Travelers who choose not to enroll in this initiative are not subject to any limitations on their travel because of their choice; they will continue to be screened at airport security checkpoints according to TSA standard screening protocols.

TSA also invites all TSA Pre✓™ applicants to complete an optional survey to gather information on the applicants' overall customer satisfaction with the service received at the enrollment center. The optional survey will be administered at the end of the in-person enrollment service (see Supporting Statement Part B for more information).

**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.**

Those seeking eligibility for TSA Pre✓™ Application Program will have the option to provide biographic information online or in-person. Applicants who choose to pre-enroll online must still go to an enrollment site to complete the enrollment process by submitting biometric data (e.g., fingerprints) and identity documents to TSA's contracted vendor. Alternatively, applicants can choose to enroll entirely in-person at an enrollment site without pre-enrolling. Applicants will also pay a non-refundable fee using a credit card, cashier's check, or money order to TSA's enrollment agent or contracted vendor; applicants have the option to pay either during pre-enrollment (online) or at an enrollment site. When the program initially launches, applicants will only be allowed to pay when they appear in-person at the enrollment center. TSA intends to provide the capability to pay online during the web pre-enrollment process as the program expands. TSA seeks to establish two initial enrollment sites and then add additional locations over time as well as implement a mobile enrollment site capability.

TSA will use the information to conduct a security threat assessment of law enforcement, immigration, and intelligence databases, including a fingerprint-based criminal history records check conducted through the Federal Bureau of Investigation (FBI). For the in-person fingerprint collection, TSA has procedures to accommodate individuals who are partial or full amputees or who may be unable to provide ten-finger fingerprints. TSA's fingerprint collection procedures conform with FBI criminal history records check request requirements which include standards and guidance for submitting requests for individuals with amputations and other circumstances that prevent a ten-finger biometric submission. The results will be used by TSA to decide if an individual poses a low risk to transportation or national security. Approved applicants will be issued a Known Traveler Number which they will use when making travel reservations. TSA Pre✓™ members who submit their Known Traveler Number for transmission to TSA will be eligible for expedited screening on U.S. flights originating from airports with TSA Pre✓™ lanes, unless randomly selected for standard screening. An individual's eligibility for TSA Pre✓™ benefits via the TSA Pre✓™ Application Program will be valid for five years after issuance, unless a disqualification occurs.

TSA will use the applicants' information for the following purposes: to pre-screen travelers by conducting security threat assessments; to accept applicants who receive an approved security threat assessment finding; to expedite security screening at airport checkpoints for approved travelers; to assist in the management and tracking of security threat assessment results for applicants and participants; to permit the retrieval of security threat assessment results; and to refer to the appropriate intelligence and law enforcement entities the identity of applicants or participants who pose or are suspected of posing a threat to transportation or national security.

The optional customer satisfaction survey is designed to gauge the experience and customer satisfaction of applicants at enrollment centers. TSA will use the information to determine whether any trends exist regarding customer service at a particular enrollment center or particular application enrollment activity and to take steps to improve service.

- 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, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.***

In compliance with the Government Paperwork Elimination Act (GPEA), applicants have the option to submit biographic and payment information online, in-person, or online with technical support over phone to TSA's enrollment provider or contracted vendor. All applicants will submit biometric data such as fingerprints at the enrollment site in person. The enrollment provider will submit all information to TSA electronically. The existing technology, automated processes and electronic submission capabilities to collect information for other TSA security threat assessment programs – Hazardous Materials Endorsement (HME) Threat Assessment and Transportation Worker Identification Credential (TWIC) programs – also will be used for the TSA Pre✓™ Application Program population. Based on similar data from existing TSA security threat assessment programs including the Hazardous Materials Endorsement (HME) Threat Assessment, Transportation Worker Identification Credential (TWIC), and Alien Flight Student programs, TSA estimates that about 68 percent of applicants will submit their biographic portions online or with TSA telephone customer support before going in-person to an enrollment center to complete the application process, while about 32 percent will submit their biographic portions in-person without providing pre-enrollment information before arriving at the enrollment center.

**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.**

No other Federal government agency is conducting this type of trusted traveler application program for travel from U.S. airports. U.S. Customs and Border Protection (CBP), another component of the Department of Homeland Security (DHS), operates a similar program for international travelers, the Global Entry Program, that also involves the use of a security threat assessment to identify low-risk travelers. To avoid duplication, and because they have been subject to a similar security threat assessment, TSA has made Global Entry Program members eligible for TSA Pre✓™ expedited screening on flights originating from U.S. airports. In addition, existing TSA Pre✓™ initiatives also avoid duplication of effort by providing Known Traveler Numbers and expedited screening to other classes of travelers who have been subject to security threat assessments, such as members of the Armed Forces, Federal judges, Members of Congress, and Executive branch personnel with certain security clearances.

TSA intends to leverage existing information technology infrastructure and systems, and other established processes to collect information and conduct the security threat assessment for the TSA Pre✓™ Application Program. This existing infrastructure and technology is used currently for other TSA security threat assessment programs such as the Hazardous Materials Endorsement (HME) threat assessment and Transportation Worker Identification Credential (TWIC) programs. The HME threat assessment program collection more closely aligns with the TSA Pre✓™ Application Program collection requirements.

TSA's existing security threat assessment technology and collection procedures, while similar to the CBP Global Entry Program, could be leveraged with minimal modification to existing processes and systems to meet the TSA Pre✓™ Application Program requirements. The TSA Pre✓™ Application Program differs from the CBP Global Entry Program in that it does not require applicants to create a user account to enroll for the program. TSA also collects a few data fields that the CBP Global Entry Program does not. These relate primarily to citizenship/ immigration information. CBP Global Entry requires a U.S. passport or machine-readable Lawful Permanent Resident (LPR) card, but TSA Pre✓™ applicants may provide additional documents that demonstrate citizenship or immigration eligibility. TSA also asks for additional optional information, such as the Social Security Number (SSN). TSA can conduct security threat assessments without an SSN, but having the information sometimes helps to expedite the review process by de-conflicting potential matches with similar names. TSA also collects some information, such as hair color and weight, because it is part of the biographic information submitted with fingerprints to the FBI for a criminal history records check. These fields (hair color and weight) also may help with positive or negative identification of the applicant during the security threat assessment process.

TSA is seeking a new OMB control number for this collection as opposed to modifying an existing, approved TSA collection, *e.g.*, OMB control number 1652-0046 for Secure Flight, or OMB control numbers for TWIC (1652-0047) or HME (1652-0027), because this collection is associated with an entirely new program.

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.***

There is no significant impact on a substantial number of small businesses.

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 gathering the information needed to enroll individuals in TSA Pre✓™ through the TSA Pre✓™ Application Program, TSA cannot verify an individual's identity, conduct a security threat assessment, or issue a Known Traveler Number. Once an individual is deemed eligible for TSA Pre✓™ Application Program, the individual is eligible for TSA Pre✓™ expedited screening for 5 years. Approved applicants will not need to provide any further information to TSA for the TSA Pre✓™ application program until the end of 5 years. Applicants must renew their application and re-enroll in order to continue to be eligible for TSA Pre✓™ expedited screening for another 5 years via the TSA Pre✓™ Application Program.

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 consistent with 5 CFR 1320.5(d)(2).

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 to that notice and describe actions taken by the agency in to these comments. Specifically address comments received on cost and hour burden.***

TSA published a 60-day notice to seek approval of a new information collection for the TSA Pre✓™ Application Program in the Federal Register on July 23, 2013 (78 FR 44140), and a 30-day notice on September 26, 2013 (78 FR 59363).

TSA received one comment in to this notice from Airlines for America. The comment expressed the company's support of TSA's proposed expansion of the TSA PreCheck Program, citing TSA's risk-based approach as consistent with TSA's Known Crew Member, cargo security programs, and Customs and Border Protection's Trusted Traveler Programs. The commenter stated that the proposed establishment of enrollment sites and mobile

enrollment capability will advance participation in the PreCheck Program without diminishing security, as well as enhance the air travel experience for all.

In addition, TSA has been working, and will continue to work closely, with many public and private stakeholders to develop and implement the most efficient and secure program possible.

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

TSA will not provide 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.**

Although there is no assurance of confidentiality to any respondent, TSA will handle all records concerning Pre✓™ Application Program applicants in accordance with the Privacy Act of 1974, and maintain the security of the information technology systems that transmit, process, and/or store the personal information in accordance with Federal Information Security Management Act (FISMA) requirements. TSA published a system of records notice in the Federal Register on September 10, 2013, DHS/TSA-021 TSA Pre✓™ Application Program System of Records (78 FR 55274).

**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.**

Collection of this information may raise questions of a sensitive nature for the individual undergoing the security threat assessment, but only to the extent necessary for TSA to determine the risk of the individual to transportation security. The security threat assessment could reveal, for example, convictions of certain crimes for which TSA may deem the individual as being ineligible for expedited screening through the TSA Pre✓™ Application Program.

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

TSA will initially establish two enrollment locations at or near airport locations, and launch additional enrollment sites over time. As operational resources and needs are further defined, TSA anticipates expanding to additional enrollment sites as needed and to utilize mobile enrollment site capability. When the program expands to additional enrollment locations, TSA anticipates just under 31,000 applicants per month with approximately 370,000 enrollments in the first year. For future year projections, TSA included an estimated 3 percent growth in annual applications. This estimate is based on current data from existing TSA Pre✓™ initiatives and anticipated planned TSA infrastructure capacity during the initial months as TSA expands the number of available enrollment sites.

**Table 1: Estimated 5 year projection for TSA Pre✓™ Application Enrollment Respondents**

5 Year Projected Application (Enrollment ) Volume By Year
---

Year	Projected Average Monthly Enrollments	Total Full Program Annual Enrollments with 3% annual growth
1	30,833	370,000
2	31,667	380,000
3	32,500	390,000
4	33,333	400,000
5	34,167	410,000
5 year Total	--	1,950,000
Average Annual Applications		390,000

Applicants may provide biographic and payment information to TSA either:

- Online pre-application (or pre-enrollment) before appearing at an enrollment center to complete the process;
- Online pre-application with TSA telephone customer service support before appearing at an enrollment center; or
- In-person at an enrollment center without online pre-enrollment

All applicants must visit an enrollment center in person to submit biometric information as well as provide valid identity and citizenship or immigration documentation as applicable. At the end of the enrollment application process, applicants are also given the option to respond to a customer satisfaction survey. Biographic, payment, biometric and survey information will be submitted electronically to TSA.

Based on historical data from the TSA TWIC, HME, and Alien Flight Student threat assessment programs, which have similar collection procedures, TSA estimates that applicants will provide biographic data as follows with the below listed burdens. In addition, TSA has also included time that an applicant may wait on average at an enrollment center before beginning the in-person portion of the application process.

**Table 2: Estimated Time and Percentage of Applicants for Providing Enrollment Data**

Type of Enrollment Data Submission	Estimated % of Applicants	Estimated Time Burden per Applicant
Online pre-application/pre-enrollment followed by in-person visit to an enrollment center	63%	36 minutes total based on: <ul style="list-style-type: none"> <li>• 15 min online pre-application</li> <li>• 9 min in person application completion at enrollment center</li> <li>• 12 min wait time at enrollment center</li> </ul>
Online pre-application/pre-enrollment with TSA telephone customer support followed by in-person visit to an enrollment center	5%	43 minutes total based on: <ul style="list-style-type: none"> <li>• 22 min online with telephonic support pre-application</li> <li>• 9 min in person application completion at enrollment center</li> </ul>

		<ul style="list-style-type: none"> <li>• 12 min wait time at enrollment center</li> </ul>
In-person at an enrollment center with no pre-enrollment	32%	24 minutes total based on: <ul style="list-style-type: none"> <li>• 12 min in person application completion at enrollment center</li> <li>• 12 min wait time at enrollment center</li> </ul>
Provide Enrollment Feedback via Customer Satisfaction Survey	35%	1.5 minutes

Applying the above estimated percentages of how applicants will choose to provide information to TSA, the tables below reflect TSA's calculations for the TSA Pre✓™ Application Program enrollment burden.

### **Estimated Number of Applicants and Associated Time Burden by Year by Type of Enrollment Data Submission**

TSA estimates that approximately 63 percent of applicants will pre-apply or pre-enroll online before visiting an enrollment center. For those individuals, TSA estimated the time burden as the sum of the average online pre-enrollment time of 15 minutes, average in-person enrollment time of 9 minutes. In addition to these estimates, TSA added 12 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility and 60 minutes for a roundtrip commute time for a total time of 96 minutes or 1.6 hours.

The estimates for wait time at the enrollment facility may vary depending on the location as TSA anticipates offering approximately 300 enrollment locations to complete in-person enrollment across the U.S. TSA based the wait time on the average wait time historically and currently observed at TSA's enrollment facilities for the Hazardous Materials Endorsement (HME) and Transportation Worker Identification Credential (TWIC) threat assessment programs which will be leveraged to provide TSA Pre✓™ Application Program enrollment services.

For travel time, TSA referenced travel time information from TSA's HME and TWIC threat assessment programs, which have in-person enrollment requirements and whose centers will also be utilized for the TSA Pre✓™ Application Program. TSA reviewed a one month historical sample of data for HME applicants from Alaska, Montana, Colorado and Illinois to represent a range of rural to more urban populations and calculated the distance and travel time between applicants' residential address zip codes to their respective enrollment center zip codes. This review indicated that average travel times ranged from approximately 35 minutes each direction to 70-170 minutes each direction in more rural and geographically dispersed states. TSA also considered the estimated travel time for the TWIC population where most of the enrollment centers are located within 5 miles of port locations where workers are required to use their TWIC and therefore located very close to the majority of the population's daily workplace. For the TWIC population, TSA estimated the overall average travel time to be between 20-25 minutes with some variations depending on the port, associated enrollment center location and each individual's frequency of travel to the port location as part of their normal work duties. TSA also extrapolated that for the TSA Pre✓™ Application Program there will be new, additional enrollment locations targeted for airport locations and urban centers; thus, applicants may already be in the vicinity of an enrollment

center for normal travel or other activities and may not have added travel time to get to an enrollment center for the program. TSA also referenced current traveler throughput at airports that have TSA Pre✓™ expedited screening to help extrapolate the relative proportion of potential program applicants at more urban locations and high volume airports compared to more geographically dispersed regions to extrapolate and estimate associated travel times. Based on the information reviewed above, TSA estimated 30 minutes of travel time in each direction for a total of 60 minutes. These estimates are included as an average based on overall full program estimates. Actual travel time may vary depending on each applicant’s specific circumstances, regional location and proximity to a TSA enrollment center.

After the program launches and actual enrollments occur, TSA will be closely monitoring enrollments and operational performance with the enrollment provider. Based on actual application volumes and demand, TSA may relocate and/or add enrollment centers as applicable to better service the TSA Pre✓™ Application Program where feasible. As the program evolves from initial launch to full program operations, TSA will be better able to refine estimates and will reflect the revised estimates based on actual information in the burden estimates with the Information Collection Request renewal.

This information is captured in Table 3 below.

**Table 3: Estimates for applicants that choose online pre-application/pre-enrollment followed by in-person visit to an enrollment center**

Year	Online Pre-Enrollment Applicants (63% of Enrollments)	Hours to Enroll per Applicant (92 minutes = 1.60hrs)	Total Hours
Column	A	B	C= A*B
1	233,100	1.60	372,960
2	239,400	1.60	383,040
3	245,700	1.60	393,120
4	252,000	1.60	403,200
5	258,300	1.60	413,280
<b>Total</b>	<b>1,228,500</b>	1.60	1,965,600

TSA estimates that approximately 5 percent of applicants may require or request TSA telephone support in order to pre-apply or pre-enroll. For those individuals, TSA estimates the time burden as the sum of the average online phone assisted pre-enrollment time of 22 minutes and average in-person enrollment time of 9 minutes. In addition to these estimates, TSA added 12 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility and 60 minutes for a roundtrip commute time for a total time of 103 minutes or 1.72 hours. This information is captured in Table 4 below.

**Table 4: Estimates for applicants that choose online pre-application/pre-enrollment with TSA telephone customer support followed by in-person visit to an enrollment center**

Year	Online Pre-Enrollment with Telephone Assistance (5% of Enrollments)	Hours to Enroll per Applicant (103 minutes = 1.72 hrs)	Total Hours
Column	A	B	C= A*B

1	18,500	1.72	31,758
2	19,000	1.72	32,617
3	19,500	1.72	33,475
4	20,000	1.72	34,333
5	20,500	1.72	35,192
<b>Total</b>	<b>97,500</b>	<b>1.72</b>	<b>167,375</b>

TSA estimates that approximately 32 percent of applicants will apply by proceeding directly to an enrollment center on a walk-in or walk-by basis without providing biographic pre-enrollment information in advance. TSA estimates approximately 12 minutes for in-person enrollment with no pre-enrollment. In addition to these estimates, TSA added 12 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility and 60 minutes for a roundtrip commute time for a total time of 84 minutes or 1.4 hours. This information is captured in Table 5 below.

**Table 5: Estimates for applicants that choose not to pre-apply/pre-enroll and provide data in-person at an enrollment center**

Year	In Person Enrollments with no Pre-Enrollment (32% of Enrollments)	Hours to Enroll per Applicant (84 minutes = 1.4 hrs)	Total Hours
Column	A	B	C= A*B
1	118,400	1.40	165,760
2	121,600	1.40	170,240
3	124,800	1.40	174,720
4	128,000	1.40	179,200
5	131,200	1.40	183,680
<b>Total</b>	<b>624,000</b>	<b>1.40</b>	<b>873,600</b>

After completing enrollment at the enrollment center, applicants are provided the option to respond to a customer satisfaction survey. Based on historical TSA security threat assessment program data from existing TSA programs, TSA estimates that approximately 35 percent of applicants will choose to respond to the survey questions. TSA estimates the survey takes an average of 1.5 minutes or 0.025 hours to complete. The number of survey participants is derived from the estimated number of new enrollments (column A) from Table 1 multiplied by percentage of participation (35%) and the estimated time.

**Table 6: Estimates for applicants that choose to respond to a customer satisfaction survey**

Year	Customer Survey Participants (35% of Enrollments)	Hours to Complete Survey per Applicant (1.5 minutes = 0.025 hrs)	Total Hours
Column	A	B	C= A*B
1	129,500	0.025	3,238
2	133,000	0.025	3,325
3	136,500	0.025	3,413
4	140,000	0.025	3,500
5	143,500	0.025	3,588

<b>Total</b>	<b>682,500</b>	<b>0.025</b>	<b>17,063</b>
--------------	----------------	--------------	---------------

Table 7 provides the calculated total enrollment burden hours. This estimate was calculated by adding the total enrollment burden hours for online pre-enrollments, telephone assisted pre-enrollment and in-person enrollments for each period along with the burden for completing the enrollment customer satisfaction survey.

**Table 7: Total Estimated Enrollment Time Burden in Hours by Year**

<b>Year</b>	<b>Online Pre-Enrollments without Phone Assistance Burden in Hours</b>	<b>Online Pre-Enrollments with Phone Assistance Burden in Hours</b>	<b>In Person Enrollment with no Pre-Enrollment Burden in Hours</b>	<b>Customer Survey Hour Burden</b>	<b>Total Application Enrollment Hours</b>
Column	A	B	C	D	F=A+B+C+D
1	372,960	31,758	165,760	3,238	573,716
2	383,040	32,617	170,240	3,325	589,222
3	393,120	33,475	174,720	3,413	604,728
4	403,200	34,333	179,200	3,500	620,233
5	413,280	35,192	183,680	3,588	635,739
<b>Total Hours</b>	<b>1,965,600</b>	<b>167,375</b>	<b>873,600</b>	<b>17,063</b>	<b>3,023,638</b>

### **Estimated Number of Applicants and Associated Time Burden by Year for Correction of Records**

After individuals provide biographic and biometric information and payment to TSA, TSA will conduct the security threat assessment to determine eligibility for the TSA Pre✓™ Application Program. If initially deemed ineligible, applicants will have an opportunity to correct cases of misidentification or inaccurate criminal or immigration records.

Based on TSA TWIC and HME threat assessment programs' historical data, TSA estimates that approximately 2 percent of TSA Pre✓™ applicants may be deemed initially ineligible. TSA will send a letter to the applicant with information regarding their potential disqualification along with instructions for applying for a correction of record. Of this 2 percent, TSA estimates that approximately 69 percent of individuals will contact TSA in writing and request a correction of record before TSA makes a final determination.

Individuals who request a correction of record must do a variety of activities depending on his or her application. At the very least, individuals need to write a letter to TSA, and they also may need to collect information about their conviction from their local jurisdiction for criminal history related disqualifying factors. In other cases, the applicant may need to only provide additional citizenship or eligible immigration related documentation. TSA estimates the average time to request a correction of record as 6 hours. TSA does not have full visibility into the time that individuals spend to request corrections for existing TSA security threat assessment programs. TSA extrapolated data based on customer service inquiries and TSA support provided to applicants who have had questions or request assistance/guidance for submitting requests to TSA. The times will vary depending on each individual's specific circumstances. For example, some individuals may only need to respond to an inquiry for valid citizenship/immigration eligibility while others may need to request additional

documents from multiple jurisdictions and entities if there are multiple items (such as criminal history events) to address and the individual does not have historical records on hand. See Table 8 below:

**Table 8: Estimated Correction of Record Burden by Year**

Year	Enrollments	% of Applicants Initially Deemed Ineligible	% of Applicants Initially Deemed Ineligible that request a Correction of Records	Estimated Time Burden in hours per Applicant for Correction of Records	Estimated Total # of Applicants to Request a Correction of Record	Total Correction of Records Hours
Column	A	B	C	D	E = (A*B*C)	F=(D*E)
1	370,000	2%	69%	6	5,106	30,636
2	380,000	2%	69%	6	5,244	31,464
3	390,000	2%	69%	6	5,382	32,292
4	400,000	2%	69%	6	5,520	33,120
5	410,000	2%	69%	6	5,658	33,948
<b>Total</b>	<b>1,950,000</b>	<b>2%</b>	<b>69%</b>	<b>6</b>	<b>26,910</b>	<b>161,460</b>
<b>Annualized</b>	<b>390,000</b>	<b>2%</b>	<b>69%</b>	<b>6</b>	<b>5,382</b>	<b>32,292</b>

**Total Annual Burden:** TSA estimates the maximum annual total burden for all collection pieces of this ICR (year 5) is approximately 669,687hours.

**Table 9: Estimated Total Burden by Year**

Year	Total Application Enrollment Burden in Hours	Total Correction of Records Burden in Hours	Total Time Burden in Hours
Column	A	B	C
1	573,716	30,636	604,352
2	589,222	31,464	620,686
3	604,728	32,292	637,020
4	620,233	33,120	653,353
5	635,739	33,948	669,687
<b>Total</b>	<b>3,023,638</b>	<b>161,460</b>	<b>3,185,098</b>
<b>Annualized</b>	<b>604,728</b>	<b>32,292</b>	<b>637,020</b>

**Total Annual Number of Respondents:** The projected average annual number of respondents for all aspects of this program is 531,882 respondents. The projected average annual number of unique respondents is 390,000 (see Table 1 above).

**Table 10: Estimated Total Number of Respondents by Year**

Year	Online Pre-Enrollment Applicants	Online Phone Assisted	In Person Enrollments (32% of	Customer Survey Participants	Applicants Requesting a Corrections	Total # of Respondents
------	----------------------------------	-----------------------	-------------------------------	------------------------------	-------------------------------------	------------------------

	(63% of Applicants)	Pre-Enrollment	Applicants)	(35% of Applicants)	of Record	
Column	A	B	C	D	E	F= A+B+C+D+E
1	233,100	18,500	118,400	129,500	5,106	504,606
2	239,400	19,000	121,600	133,000	5,244	518,244
3	245,700	19,500	124,800	136,500	5,382	531,882
4	252,000	20,000	128,000	140,000	5,520	545,520
5	258,300	20,500	131,200	143,500	5,658	559,158
<b>Total</b>	<b>1,228,500</b>	<b>97,500</b>	<b>624,000</b>	<b>682,500</b>	<b>26,910</b>	<b>2,659,410</b>
<b>Annualized</b>	<b>245,700</b>	<b>19,500</b>	<b>124,800</b>	<b>136,500</b>	<b>5,382</b>	<b>531,882</b>

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

Applicants will be required to pay a non-refundable fee of approximately \$85.00 when enrolling. For individuals that choose to request a Correction of Record after TSA notifies them of preliminary determination of ineligibility, TSA estimates the cost to be \$1.00 per applicant request to include costs for mailing in a request to TSA and the potential average costs for printing, photocopying or requesting additional supporting documentation if necessary. As mentioned in Question 12, TSA does not have full visibility to the cost individuals will incur to request corrections for existing TSA security threat assessment programs. TSA extrapolated data based on customer service inquiries and TSA support provided to applicants who have had questions or request assistance/guidance for submitting requests to TSA. As a result, the costs will vary since some individual's may only need to respond to an inquiry for valid citizenship/immigration eligibility with documents already within their possession, while others may need to request additional documents from multiple jurisdictions and entities if there are multiple items to address (such as criminal history events) and the individual does not have historical records on hand.

TSA estimates the total annual cost burden to respondents resulting from the collection of information is the sum of the application enrollment costs and the correction of record costs as follows:

**Table 11: Estimated Application Enrollment Cost Burden**

Year	New Enrollments	Estimated Fee \$85	Total Application Enrollment Cost Burden
Column	A	B	C
1	370,000	\$85	31,450,000
2	380,000	\$85	32,300,000
3	390,000	\$85	33,150,000

4	400,000	\$85	34,000,000
5	410,000	\$85	34,850,000
<b>Total</b>	<b>1,950,000</b>	<b>\$85</b>	<b>165,750,000</b>
<b>Annualized</b>	<b>390,000</b>	<b>\$85</b>	<b>33,150,000</b>

TSA estimates the average associated cost to individuals for requesting a correction of record to be approximately \$1.00 to cover the cost of postage for sending a letter in writing to TSA and generating photocopies and documentation for the correction of record request.

**Table 12: Estimated Correction of Record Cost Burden**

Year	Correction of Records Requests	Average Cost for a Correction of Record Request	Total Correction of Record Cost Burden
Column	A	B	C = A*B
1	5,106	\$1.00	\$5,106
2	5,244	\$1.00	\$5,244
3	5,382	\$1.00	\$5,382
4	5,520	\$1.00	\$5,520
5	5,658	\$1.00	\$5,658
Total	<b>26,910</b>	<b>\$1.00</b>	<b>\$26,910</b>
Annualized	<b>5,382</b>	<b>\$1.00</b>	<b>\$5,382</b>

The maximum annual total cost burden (year 5) for the TSA Pre✓™ Application Program is estimated to be \$35,402,910 based on the sum of Total Application Enrollment Costs and Total Correction of Record Costs.

**Table 13: Estimated Total Annual Cost Burden**

Year	Total Application Enrollment Cost Burden	Total Correction of Record Cost Burden	Total Cost Burden
Column	A	B	C = A+B
1	\$31,450,000	\$5,106	\$31,455,106
2	\$32,393,500	\$5,244	\$32,398,744
3	\$33,365,305	\$5,382	\$33,370,687
4	\$34,366,264	\$5,520	\$34,371,784
5	\$35,397,252	\$5,658	\$35,402,910
Total	<b>\$166,972,321</b>	<b>\$26,910</b>	<b>\$166,999,231</b>
Annualized	<b>\$33,394,464</b>	<b>\$5,382</b>	<b>\$33,399,846</b>

**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.**

The estimated cost to the Government for security threat assessments will be recovered in the fee charged to TSA Pre✓™ Application Program applicants. As noted above in the response to question 4, TSA intends to leverage existing information technology infrastructure and systems, and other established processes to collect information and conduct the security threat assessment for the TSA Pre✓™ Application Program. TSA has spent \$1.7 million in appropriated funds to develop the program leveraging its existing infrastructure.

TSA will charge a total fee of \$85.00 per person to recover fully the cost of this unique security service. The fee is comprised of two components, the (1) “TSA Fee”; and (2) “FBI Fee.” The TSA Fee component is designed to fully recover the estimated costs TSA will incur to enroll applicants, process applications including any necessary redress, communicate results, monitor participants, and provide overall program management and oversight. Such activities include costs for personnel, modifications to information technology systems, system redundancy, system integration, helpdesk services, mailings, and general program office management. This fee component is \$70.50 and will ensure that each program participant is charged an equitable portion of the cost necessary to operate this unique security service program.

The FBI Fee component is designed to fully recover the cost that the FBI imposes on TSA to conduct a CHRC. As part of the security threat assessment, TSA submits fingerprints to the FBI to obtain any criminal history records that correspond to the fingerprints. The FBI is authorized to establish and collect fees to process fingerprint identification records. See 28 U.S.C. 534 note. This fee is currently set at \$14.50. See Notice, FBI Criminal Justice Information Services Division; Revised User Fee Schedule, 76 FR 78950 (Dec. 20, 2011). If the FBI increases or decreases its charge to complete the CHRC, the increase or decrease will apply to this program fee component and the total TSA Pre✓™ application program fee on the date that the new FBI fee becomes effective.

TSA will collect the total fee at the time of application to the program in accordance with TSA-approved payment methods. TSA will not issue fee refunds once vetting services have commenced. Further, TSA will not refund the fee, in whole or in part, to individuals who are not approved for participation in the program based upon the results of TSA’s assessment. The TSA Pre✓™ application program KTN, and the underlying security threat assessment, are valid for a maximum of five years or until a disqualification occurs.

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

This is a new collection thus there are no program changes or adjustments to report.

**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 results from this information collection.

***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 planning to display the OMB control number along with the expiration date.

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

TSA does not seek any exception to the certification statement.