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## **INFORMATION COLLECTION SUPPORTING STATEMENT**

### **TSA Pre✓<sup>®</sup> Application Program** **OMB Control Number 1652-0059** *Last Updated: 11/16/15*

- 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, the Transportation Security Administration (TSA) has implemented a voluntary enrollment program for individuals to apply for the TSA Pre✓<sup>®</sup> Application 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 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 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).

The TSA Pre✓<sup>®</sup> Application Program is a voluntary passenger prescreening initiative for low-risk passengers who are eligible to receive expedited screening at participating U.S. airport security checkpoints. The TSA Pre✓<sup>®</sup> Application Program is one of several expedited screening initiatives that TSA is implementing. The Application Program, as well as the larger set of TSA Pre✓<sup>®</sup> 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.

TSA uses the information provided by the applicant to conduct security threat assessments (STAs) of the applicant. Travelers determined by TSA to present a low risk to transportation security receive a Known Traveler Number (KTN) pursuant to this initiative, and are eligible for expedited screening at U.S. airports with TSA Pre✓<sup>®</sup> lanes for five years. After five years, those who wish to continue participating in the program must re-enroll by submitting a new application, including the associated fee, biographic information, identity documents, and biometric information (*e.g.*, fingerprints, iris scans, and/or photo). 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.

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Currently, TSA has one contractor that enrolls individuals into the TSA Pre✓<sup>®</sup> Application Program. TSA will expand the number of contractors to increase access to enrollment capabilities and applications. Approved contractors will provide secure enrollment options to collect biographic and biometric information, validate identity, collect citizenship/immigration information, and perform a criminal history records check to ensure that applicants do not have convictions for criminal offenses that would disqualify them from the TSA Pre✓<sup>®</sup> Application Program. Please refer to the list of current criminal disqualifiers available at [www.tsa.gov/tsa-precheck/eligibilityrequirements](http://www.tsa.gov/tsa-precheck/eligibilityrequirements). These expansion options may include the use of commercial and other publicly available data to verify identity, citizenship/immigration status, and criminal history records.

TSA invites all TSA Pre✓<sup>®</sup> Application Program applicants to complete an optional survey to gather information on the applicants' overall customer satisfaction with the enrollment process. The optional survey is 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 the voluntary TSA Pre✓<sup>®</sup> Application Program have several options to provide the necessary biographic information: pre-enrollment online before in-person enrollment; in-person enrollment; post-enrollment online after visiting an in-person enrollment center; mail; or fax. Applicants who choose to pre-enroll online must still go to an enrollment center to complete the enrollment process by submitting biometric data (e.g., fingerprints, iris scans, and/or photo) and identity and citizenship/immigration documents they did not provide online. Alternatively, applicants can choose to enroll entirely in-person at an enrollment center without pre-enrolling. Lastly, if applicants are not able to provide identity and citizenship or immigration documents/data during in-person enrollment, they may provide this information post-enrollment either online, through mail, or through fax.

All applicants pay a non-refundable application fee to TSA's contractor using a credit card, cashier's check, or money order. Currently, applicants pay at the time of enrollment at an enrollment center. In the future, TSA will also offer an option to pay during pre-enrollment. A portion of this non-refundable fee is used to cover TSA's costs in conducting the security threat assessment. TSA's existing contractor currently operates over 300 enrollment locations as well as offers mobile enrollment center capability.

The biographic and biometric information is used by TSA to conduct STAs, using law enforcement, immigration, and intelligence databases. Additionally, all biometrics collected (fingerprints, iris scan, and/or photo) may be used in the future at airport checkpoints for identity verification. For those individuals who did not provide all three types of biometrics during their initial TSA Pre✓<sup>®</sup> Application Program enrollment, TSA will provide a capability to provide biometric data post-enrollment.

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Applicants who apply through TSA's existing program contractor are notified of their eligibility for the program by TSA after completion of the STA.

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 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. Similarly, TSA will include alternative biometrics, specifically iris scan and photo, to further enhance identity verification, particularly at the time of travel.

Approved applicants to the TSA Pre✓<sup>®</sup> Application Program are issued a KTN that they use when making travel reservations. Currently, the KTN is provided to the applicant via a letter or website, but TSA is looking at providing the application status notification through alternate communication methods such as e-mail and text. When providing the KTN notification, TSA plans to provide the applicant with roles and responsibilities associated with the use of the KTN. TSA Pre✓<sup>®</sup> Application Program members who submit their KTN for transmission to TSA will be eligible for expedited screening on U.S. flights originating from airports with TSA Pre✓<sup>®</sup> lanes, unless randomly selected for standard screening. An individual's eligibility for TSA Pre✓<sup>®</sup> expedited screening via the TSA Pre✓<sup>®</sup> Application Program will be valid for five years after issuance, unless a disqualification occurs or as stated by the terms and conditions of their enrollment.

TSA uses the applicants' information to: vet potential TSA Pre✓<sup>®</sup> Application Program members by conducting STAs; accept into the Program applicants who receive an approved STA finding; prescreen travelers in TSA's Secure Flight program prior to their travel when they include their KTN with their travel reservations; provide security screening at airport checkpoints; verify identity at airport checkpoints; assist in the management and tracking of STA results for applicants and participants; permit the retrieval of STA results; 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; and to assist contractors and their agents, grantees, experts, consultants, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for DHS, when necessary to accomplish an agency function related to this program.

The optional customer satisfaction survey is designed to gauge the experience and customer satisfaction of applicants at enrollment centers. TSA uses 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.

#### **Contractor-Provided Birth Certificate Certification Process**

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Beginning in calendar year 2015, TSA's existing TSA Pre✓<sup>®</sup> Application Program contractor will separately offer as an option to applicants a new service that provides real-time electronic certification of birth certificates for applicants who do not bring documents proving U.S. citizenship to in-person enrollment. This service is entirely offered and managed by the contractor, and thus not included in TSA's burden estimate analysis. To use the birth certificate certification service, the applicant must pay a supplemental fee to the contractor and provide an additional data element (mother's maiden name) currently not required as part of the TSA Pre✓<sup>®</sup> Application Program application. Applicants who choose to use this service will pay the supplemental fee directly to the program contractor to cover the contractor's costs in providing the 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 responses, 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 or in-person. All applicants submit biometric data such as fingerprints, iris scans, or photos at the enrollment center in person. The enrollment provider submits all information to TSA electronically. The existing technology, automated processes, and electronic submission capabilities to collect information for other TSA STA programs – Hazardous Materials Endorsement (HME) Threat Assessment and Transportation Worker Identification Credential (TWIC) programs – is used for the TSA Pre✓<sup>®</sup> Application Program population. Based on current data from the existing TSA Pre✓<sup>®</sup> Application Program, TSA estimates that: about 20 percent of applicants will submit their biographic information online before going in-person to an enrollment center to complete the application process; 5 percent of applicants will submit their biographic information telephonically; and about 70 percent will submit their biographic information in-person without providing pre-enrollment information before arriving at the enrollment center.

Additionally, from a post-enrollment perspective, TSA estimates that 50 percent of applicants will return to an enrollment center to provide additional biometric data such as photo and/or iris scans. TSA estimates that 20 percent of applicants will provide citizenship or immigration data or documents online and 10 percent of applicant will provide this information via mail or fax.

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- 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. Nonetheless, in designing and implementing the TSA Pre✓<sup>®</sup> Application Program, TSA took a number of steps to reduce duplication of effort and leverage both this and other programs whenever possible.

First, TSA leverages existing information technology infrastructure and established processes used for its TWIC and HME programs to collect information and conduct the STA for the TSA Pre✓<sup>®</sup> Application Program. Leveraging this existing infrastructure and processes permitted TSA to implement the Application Program at much lower costs.

Second, TSA has evaluated STAs performed by other government agencies and, where those STAs have been found to be equivalent to the STA performed by TSA for the Application Program, have provided individuals who were the subjects of those STAs with eligibility for TSA Pre✓<sup>®</sup> expedited screening. In particular, U.S. Customs and Border Protection (CBP), another component of the Department of Homeland Security (DHS), operates trusted traveler programs for international travelers, such as the Global Entry Program, that also involve the use of a STA to identify low-risk travelers. To avoid duplication, and because they have been subject to a similar STA, TSA has made members of DHS trusted traveler programs eligible for TSA Pre✓<sup>®</sup> expedited screening on flights originating from U.S. airports. In addition, TSA avoided duplication of effort by providing KTNs and expedited screening eligibility to other classes of travelers who have been subject to other forms of risk assessments, such as members of the Armed Forces, Federal judges, and Executive branch personnel with certain security clearances. Efforts to add additional government personnel with security clearances continue, and are dependent on cooperation from other federal agencies.

As TSA expands the number of contractors/enrollment providers as described above to increase applications, it will continue to avoid duplication of effort by using existing infrastructure and processes whenever possible. For example, TSA will use existing infrastructure and processes to perform citizenship/immigration status checks and STAs.

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When TSA created the TSA Pre✓<sup>®</sup> Application Program, it considered using the CBP Global Entry Program, but decided against using it for a number of reasons. First, TSA was able to leverage the existing STA technology and collection procedures for TWIC and HME with minimal modification to meet the TSA Pre✓<sup>®</sup> Application Program requirements. Adapting the CBP program to meet the TSA Pre✓<sup>®</sup> Application Program requirements would have required significant effort and resources from both CBP and TSA. Second, the TSA Pre✓<sup>®</sup> 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 or complete an in-person interview. TSA also collects a few data fields that the CBP Global Entry Program does not. These relate primarily to citizenship/immigration information and biometrics. CBP Global Entry requires a U.S. passport or machine-readable Lawful Permanent Resident (LPR) card, but TSA Pre✓<sup>®</sup> Application Program applicants may provide additional data or documents that demonstrate citizenship or immigration eligibility. Furthermore, TSA may request that applicants provide an iris scan in addition to the fingerprints and photo that are collected as part of the CBP Global Entry process. TSA also asks for additional optional information, such as the Social Security Number (SSN). TSA can conduct STAs without an SSN, but having the information can help 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 as necessary. These fields (hair color and weight) also may help with positive or negative identification of the applicant during the STA process. As noted above, TSA leverages the STA conducted for applicants to CBP trusted traveler programs to provide those individuals with TSA Pre✓<sup>®</sup> expedited screening on flights originating from U.S. airports. Finally, the TSA, CBP and DHS web sites all include information for travelers to help them decide which DHS trusted traveler program best suits their needs, including a chart that compares these programs found at [www.dhs.gov/comparison-chart](http://www.dhs.gov/comparison-chart).

- 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 the TSA Pre✓<sup>®</sup> Application Program, TSA cannot verify an individual's identity, conduct a STA, or issue a KTN. Once an individual is deemed eligible for the TSA Pre✓<sup>®</sup> Application Program, the individual is eligible for TSA Pre✓<sup>®</sup> expedited screening for five years. Approved applicants do not need to provide any further information to TSA for the TSA Pre✓<sup>®</sup> Application Program until the end of five years. Applicants must re-enroll in order to continue to be

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eligible for TSA Pre✓<sup>®</sup> expedited screening for another five years via the TSA Pre✓<sup>®</sup> 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).**

There are no special circumstances requiring the collection of information to be inconsistent 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 response to these comments. Specifically address comments received on cost and hour burden.**

TSA published a 60-day notice to seek approval of a revised information collection for the TSA Pre✓<sup>®</sup> Application Program in the Federal Register. See 80 FR 515 (January 6, 2015). TSA received no comments in response to this notice. In addition to the 60-day notice, TSA also published a 30-day notice for the revised information collection. See 80 FR 29727, (May 22, 2015).

TSA also published a notice soliciting comments from the traveling public concerning their overall views of the TSA Pre✓<sup>®</sup> Application Program and how TSA might expand or improve it. See 79 FR 78895 (December 31, 2014). The agency received 10 comments. The majority of the commenters support the program and expanding enrollment opportunities. None of the commenters addressed the cost and burden of the information collection. A few commenters expressed concern about the use of public and/or commercial databases to verify identity and conduct criminal checks. TSA will not be adding commercial data for enrollment expansion under this collection. TSA will not rely on or evaluate factors such as religion, financial status, health records, constitutionally protected activity, or other records reflecting an individual's socio-economic status.

One of the commenters also questioned how the applicants' private information would be secured. Contractors will be required to limit access to data to those employees and subcontractors who require the information in order to perform their official duties under this contract. All TSA data, including but not limited to PII, will be protected according to DHS and TSA security policies and mandates. Contractors using TSA information technology will be required to adhere to all system security requirements to ensure the confidentiality, integrity, availability, and non-repudiation of all information, specifically PII under their control.

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One commenter asked what sort of redress would be offered. Applicants found ineligible by the contractor or by TSA will be notified of the reason. In all instances, applicants will be offered an opportunity to correct their records. However, TSA retains final authority to determine eligibility for the TSA Pre✓<sup>®</sup> Application Program and no redress is offered.

Additionally, a commenter asked whether recurrent vetting would be conducted by the contractors as a potential future capability. TSA conducts recurrent vetting against watch lists on existing, approved members of the TSA Pre✓<sup>®</sup> Application Program, and also will recurrently vet future members of the Application Program.

**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 gift 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 TSA Pre✓<sup>®</sup> 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 Privacy Act system of records notice in the [Federal Register](#), DHS/TSA-021 TSA Pre✓<sup>®</sup> Application Program System of Records. See 78 FR 55274 (September 10, 2013).

**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.***

TSA does not ask any questions that relate to sexual behavior or attitudes, religious beliefs, or other commonly considered private matters. TSA does require criminal history information from applicants (including whether applicants have been convicted or found not guilty by reason of insanity), as well as whether they ever have “been found by a court or other lawful authority as lacking mental capacity or involuntarily committed to a mental institution” This information is critical to determining whether the applicant is low risk, and TSA has long collected this kind of information for transportation security vetting purposes from other populations (for example, TWIC, HME and aviation workers with unescorted access to sensitive areas of airports). TSA understands the importance of protecting all applicant information and has robust privacy protections in place.



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

TSA initiated the TSA Pre✓® Application Program on December 4, 2013 and is currently operating over 300 enrollment locations. In its first full year, TSA processed an average of 67,000 applicants per month with approximately 804,000 enrollments in the first year.

**Table 1: Estimated 3 year projection for TSA  
Pre✓® Application Enrollment Respondents**

<b>3 Year Project Application (Enrollment) Volume By Year</b>	
<b>Calendar Year (CY)</b>	<b>Total TSA Pre✓® Application Program Annual Enrollments</b>
Column	A
1 (2016 Estimate)	800,000
2 (2017 Estimate)	800,000
3 (2018 Estimate)	800,000
<b>Total</b>	<b>2,400,000</b>
<b>Annualized</b>	<b>800,000</b>

Under TSA's existing TSA Pre✓® Application Program contractor, applicants provide biographic, biometric, and payment information to TSA through any of the methods listed below:

- 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;
- In-person at an enrollment center without online pre-enrollment;
- In-person post-enrollment at an enrollment center to provide biometric data;
- Online post-enrollment to upload valid identity and citizenship or immigration data or documents; or
- Mail or fax of valid identity and citizenship or immigration documents

As stated above, biographic data may be provided through pre-enrollment or in-person at the enrollment center. However, all applicants must visit an enrollment center in person to submit biometric information. Valid identity and citizenship or immigration data or documents may be provided during pre-enrollment, in-person enrollment, or post-enrollment. At the end of the in-person enrollment application process, applicants are also given the option to respond to a customer satisfaction survey.

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Biographic, payment, biometric, and survey information are submitted electronically by the existing program contractor to TSA.

Based on historical data from the first year of the TSA Pre✓® Application Program, 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**

<b>Type of Enrollment Data Submission</b>	<b>Estimated % of Applicants</b>	<b>Estimated Time Burden per Applicant</b>
Online pre-application/pre-enrollment followed by in-person visit to an enrollment center	20%	29 minutes total based on: <ul style="list-style-type: none"> <li>• 10 min online pre-application</li> <li>• 9 min in person application completion at enrollment center</li> <li>• 10 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%	41 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> <li>• 10 min wait time at enrollment center</li> </ul>
In-person at an enrollment center with no pre-enrollment	75%	22 minutes total based on: <ul style="list-style-type: none"> <li>• 12 min in person application completion at enrollment center</li> <li>• 10 min wait time at enrollment center</li> </ul>
Provide Enrollment Feedback via Customer Satisfaction Survey	35%	2.5 minutes
In-person post-enrollment at an enrollment center to provide additional biometric data	50%	5 minutes
Online post-enrollment to upload valid identity and citizenship or immigration data or documents	20%	5 minutes
Mail or fax of valid identity and citizenship or immigration documents	10%	5 minutes

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

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

The estimates for wait time at the enrollment facility may vary depending on the location as TSA operates over 300 enrollment locations to complete in-person enrollment across the U.S. The current national wait time average is 10 minutes.

For travel time, TSA referenced travel time information from the first year of historical data of the TSA Pre✓<sup>®</sup> Application Program.

TSA reviewed a sample of data for TSA Pre✓<sup>®</sup> Application Program applicants from the following locations to represent a range of on-airport and off-airport enrollment centers as well as rural and urban locations:

- Albany, NY
- Butte, MT
- Denver, CO
- Seattle, WA
- Tampa, FL
- Wichita, KS

TSA 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 6-41 minutes each direction to 61-249 minutes each direction in more rural and geographically dispersed states. Based on the information reviewed above, TSA calculated an average of 27 minutes of travel time in each direction for a total of 54 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.

#### ***Online and Telephonic Pre-Enrollment Followed by In-Person Enrollment Burden***

Currently, 20 percent of applicants 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 10 minutes (reduced from 15 minutes in the original submission), average in-person enrollment time of 9 minutes.

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- While enrollment times have been reduced since the original submission, collection of additional data elements such as photo and iris scan mean that the enrollment time of 9 minutes remains unchanged.
- In addition to these estimates, TSA added 10 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility and 54 minutes for a roundtrip commute time for a total time of 83 minutes or 1.38 hours.

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**

Calendar Year (CY)	Pre-Enrollment Applicants (20% of Enrollments)	Hours to Pre-Enroll per Applicant (83 minutes = 1.38 hours)	Total Hours
Column	A	B	C= A*B
1 (2016 Estimate)	160,000	1.38	220,800
2 (2017 Estimate)	160,000	1.38	220,800
3 (2018 Estimate)	160,000	1.38	220,800
<b>Total</b>	<b>480,000</b>	<b>1.38</b>	<b>662,400</b>

Currently, 5 percent of applicants 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.
- While enrollment times have been reduced since the original submission, collection of additional data elements such as photo and iris scan mean that the enrollment time of 9 minutes remains unchanged.
- In addition to these estimates, TSA added 10 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility and 54 minutes for a roundtrip commute time for a total time of 95 minutes or 1.58 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**

Calendar Year (CY)	Phone Assisted Pre-Enrollment (5% of Enrollments)	Hours to Enroll per Applicant (95 minutes = 1.58 hours)	Total Hours
Column	A	B	C= A*B
1 (2016 Estimate)	40,000	1.58	63,200
2 (2017 Estimate)	40,000	1.58	63,200

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3 (2018 Estimate)	40,000	1.58	63,200
<b>Total</b>	<b>120,000</b>	<b>1.58</b>	<b>189,600</b>

***In-Person Enrollment without Pre-Enrollment Burden***

Currently, approximately 75 percent of applicants apply by proceeding directly to an enrollment center on a walk-in or walk-by basis without providing biographic pre-enrollment information in advance.

- While enrollment times have been reduced since the original submission, collection of additional data elements such as photo and iris scan mean that the enrollment time of 12 minutes remains unchanged.
- In addition to these estimates, TSA added 10 minutes of time to the total estimate in order to account for possible wait time at the enrollment facility and 54 minutes for a roundtrip commute time for a total time of 76 minutes or 1.27 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**

<b>Calendar Year (CY)</b>	<b>In Person Enrollments with no Pre-Enrollment (75% of Enrollments)</b>	<b>Hours to Enroll per Applicant (76 minutes = 1.27 hours)</b>	<b>Total Hours</b>
Column	A	B	C= A*B
1 (2016 Estimate)	600,000	1.27	762,000
2 (2017 Estimate)	600,000	1.27	762,000
3 (2018 Estimate)	600,000	1.27	762,000
<b>Total</b>	<b>1,800,000</b>	<b>1.27</b>	<b>2,286,000</b>

***Customer Satisfaction Survey Burden***

After completing enrollment at the enrollment center, applicants are provided the option to respond to a customer satisfaction survey. Based on current data, approximately 35 percent of applicants will choose to respond to the survey questions. TSA estimates the survey takes an average of 2.5 minutes or 0.04 hours to complete. There has been an increase of one minute in the survey time to account for an additional question regarding the convenience of an enrollment location. The survey burden is derived from the estimated number of new enrollments (column A) from Table 1 multiplied by percentage of participation (35%) and the estimated time.

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

<b>Calendar Year (CY)</b>	<b>Customer Survey Participants (35% of Enrollments)</b>	<b>Hours to Complete Survey per Applicant (3 minutes = .04 hours)</b>	<b>Total Hours</b>
Column	A	B	C= A*B
1 (2016 Estimate)	280,000	0.04	11,200
2 (2017 Estimate)	280,000	0.04	11,200
3 (2018 Estimate)	280,000	0.04	11,200
<b>Total</b>	<b>840,000</b>	0.04	<b>33,600</b>

***Post-Enrollment Biometric Submission Burden***

Individuals may return to an enrollment center after their enrollment to provide biometrics that may not have been captured during their initial enrollment. During the initial launch of the TSA Pre✓® Application Program, fingerprints were the only required biometric that needed to be provided with an individual’s application. This was also true for individuals eligible for the TSA Pre✓® expedited screening via their membership in CBP’s Global Entry program. Beginning in calendar year 2015, TSA may use additional biometrics, specifically an iris scan and photo, at the airport checkpoint for identity verification to ensure the individual was the applicant granted eligibility for the program. TSA estimates individuals enrolled in the TSA Pre✓® Application Program prior to the new requirement or in other TSA Pre✓® eligible populations, such as Global Entry, without the additional biometrics requirements, may come back in the first year (2015) to provide additional biometrics. The submission burden is derived from the estimated number of initial and new enrollments multiplied by percentage of those providing biometrics post-enrollment (50%) and the estimated time.

**Table 7: Estimates for applicants that provide biometrics post-enrollment**

<b>Calendar Year (CY)</b>	<b>Post-Enrollment Providing of Biometrics (50% of Enrollments)</b>	<b>Hours to Provide Biometrics per Applicant (59 minutes = .98 hours)</b>	<b>Total Hours</b>
Column	A	B	C= A*B
1 (2016 Estimate)	2,452,132	0.98	2,403,089
2 (2017 Estimate)	300,000	0.98	294,000
3 (2018 Estimate)	300,000	0.98	294,000

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<b>Total</b>	<b>3,052,132</b>	<b>0.98</b>	<b>2,991,089</b>
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\* 2016 enrollment is based on 2014 TSA Pre✓® Application Program actuals of 804,263, Global Entry participants as of March 2015 of 3.5M and expected Global Entry 2015 new enrollments of 600K.

***Post-Enrollment Identity and Citizenship or Immigration Data/Document Submission Burden***

Since the launch of the TSA Pre✓® Application Program, TSA’s contractor has turned away applicants who have not brought valid identity, citizenship, or immigration data or documents to the in-person enrollment process. This occurred primarily for individuals who inquired about applying on a walk-in basis, mostly at airport enrollment locations, but did not have all the required identity and/or proof of citizenship or immigration eligibility documentation with them. Due to the significant number of applicants who have been turned away, beginning in calendar year 2015, TSA intends to allow individuals who do not provide or bring their citizenship or immigration data or documents to the enrollment center to provide this information post-enrollment. TSA estimates that 20 percent of applicants will elect to provide this information online while 10 percent will choose to mail or fax the information. The corresponding burden is reflected in tables 8 and 9 below.

**Table 8: Estimates for applicants that provide identity and citizenship or immigration data or documents online post-enrollment**

<b>Calendar Year (CY)</b>	<b>Online Post-Enrollment Providing of Identity, Citizenship, Immigration Data Documents (20% of Enrollments)</b>	<b>Hours to Provide Data or Documents per Applicant (5 minutes = .08 hours)</b>	<b>Total Hours</b>
Column	A	B	C= A*B
1 (2016 Estimate)	160,000	0.08	12,800
2 (2017 Estimate)	160,000	0.08	12,800
3 (2018 Estimate)	160,000	0.08	12,800
<b>Total</b>	<b>480,000</b>	<b>0.08</b>	<b>38,400</b>

**Table 9: Estimates for applicants that provide identity and citizenship or immigration data or documents via mail or fax post-enrollment**

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<b>Calendar Year (CY)</b>	<b>Mail or Fax Post-Enrollment Providing of Identity, Citizenship, Immigration Data Documents (10% of Enrollments)</b>	<b>Hours to Provide Data or Documents per Applicant (5 minutes = .08 hours)</b>	<b>Total Hours</b>
Column	A	B	C= A*B
1 (2016 Estimate)	80,000	0.08	6,400
2 (2017 Estimate)	80,000	0.08	6,400
3 (2018 Estimate)	80,000	0.08	6,400
<b>Total</b>	<b>240,000</b>	<b>0.08</b>	<b>19,200</b>



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Table 10 provides the calculated total enrollment burden hours. This estimate was calculated by adding the total enrollment burden hours for online pre-enrollments, telephonic pre-enrollments, and in-person enrollments, customer satisfaction survey burden, and post-enrollment data submission burdens for each period.

**Table 10: Total Estimated Enrollment Time Burden in Hours by Year**

<b>Calendar Year (CY)</b>	<b>Online Pre-Enrollments Burden in Hours</b>	<b>Phone-Assisted Pre-Enrollment Burden in Hours</b>	<b>In Person Enrollment with no Pre-Enrollment Burden in Hours</b>	<b>Customer Survey Hour Burden</b>	<b>Post-Enrollment Biometric Submission Burden in Hours</b>	<b>Post-Enrollment Online Data and Document Submission Burden in Hours</b>	<b>Post-Enrollment Mail/Fax Data and Document Submission Burden in Hours</b>	<b>Total Application Enrollment Hours</b>
Column	A	B	C	D	E	F	G	H=A+B+C+D+E+F+G
1 (2016 Estimate)	220,800	63,200	762,000	11,200	2,403,089	12,800	6,400	3,479,489
2 (2017 Estimate)	220,800	63,200	762,000	11,200	294,000	12,800	6,400	1,370,400
3 (2018 Estimate)	220,800	63,200	762,000	11,200	294,000	12,800	6,400	1,370,400
<b>Total</b>	<b>662,400</b>	<b>189,600</b>	<b>2,286,000</b>	<b>33,600</b>	<b>2,991,089</b>	<b>38,400</b>	<b>19,200</b>	<b>6,220,289</b>

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

### **TSA Pre✓<sup>®</sup> Application Program OMB Control Number 1652-0059**

#### **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 conducts the STA to determine eligibility for the TSA Pre✓<sup>®</sup> Application Program. If initially deemed ineligible, applicants will have an opportunity to correct cases of misidentification or inaccurate criminal or immigration records.

Based on current data, approximately 0.07 percent of TSA Pre✓<sup>®</sup> Application Program applicants are deemed initially ineligible. TSA sends a letter to the applicant with information regarding their potential disqualification along with instructions for applying for a correction of record. Of this 0.07 percent, approximately 45 percent of individuals 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 provide additional citizenship or eligible immigration related documentation. TSA estimates the average time to request a correction of record is six hours. TSA does not have full visibility into the time that individuals spend to request corrections for existing TSA STA programs. TSA extrapolated data based on customer service inquiries and TSA support provided to applicants who have had questions or who requested 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 11 below:

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**Table 11: Estimated Correction of Record Burden by Year**

<b>Calendar Year (CY)</b>	<b>Enrollments</b>	<b>% of Applicants Initially Deemed Ineligible</b>	<b>% of Applicants Initially Deemed Ineligible that request a Correction of Records</b>	<b>Estimated Time Burden in hours per Applicant for Correction of Records</b>	<b>Estimated Total # of Applicants to Request a Correction of Record</b>	<b>Total Correction of Records Hours</b>
Column	A	B	C	D	E=(A*B*C)	F=(D*E)
1 (2016 Estimate)	800,000	0.07%	45%	6	253	1,518
2 (2017 Estimate)	800,000	0.07%	45%	6	253	1,518
3 (2018 Estimate)	800,000	0.07%	45%	6	253	1,518
<b>Total</b>	<b>2,400,000</b>	<b>0.07%</b>	<b>45%</b>	<b>6</b>	<b>759</b>	<b>4,555</b>
<b>Annualized</b>	<b>800,000</b>	<b>0.07%</b>	<b>45%</b>	<b>6</b>	<b>253</b>	<b>1,518</b>

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**Total Annual Burden:** TSA estimates the annual total burden for all collection pieces of this ICR is approximately **2,074,947** hours.

**Table 12: Estimated Total Burden by Year**

<b>Calendar Year (CY)</b>	<b>Total Application Enrollment Burden in Hours</b>	<b>Total Correction of Records Burden in Hours</b>	<b>Total Time Burden in Hours</b>
Column	A	B	C= A+B
1 (2016 Estimate)	3,479,489	1,518	3,481,007
2 (2017 Estimate)	1,370,400	1,518	1,371,918
3 (2018 Estimate)	1,370,400	1,518	1,371,918
<b>Total</b>	<b>6,220,289</b>	<b>4,554</b>	<b>6,224,843</b>
<b>Annualized</b>	<b>2,073,430</b>	<b>1,518</b>	<b>2,074,947</b>

**INFORMATION COLLECTION SUPPORTING STATEMENT**

**TSA Pre✓<sup>®</sup> Application Program  
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**Total Annual Number of Respondents:** The projected number of respondents for all aspects of this program is 7,012,891 respondents. The projected average annual number of respondents is 2,337,630.

**Table 13: Estimated Total Number of Respondents by Year**

Calendar Year (CY)	Pre-Enrollment Applicants (20% of Enrollments)	Phone Assisted Pre-Enrollment (5% of Enrollments)	In Person Enrollments with no Pre-Enrollment (75% of Enrollments)	Customer Survey Participants (35% of Enrollments)	Post-Enrollment Providing of Biometrics (50% of Enrollments)	Online Post-Enrollment Providing of Identity, Citizenship, Immigration Data Documents (20% of Enrollments)	Mail or Fax Post-Enrollment Providing of Identity, Citizenship, Immigration Data Documents (10% of Enrollments)	Estimated Total # of Applicants to Request a Correction of Record	Total # of Respondents
Column	A	B	C	D	E	F	G	H	I=A+B+C+D+E+F+G+H
1 (2016 Estimate)	160,000	40,000	600,000	280,000	2,452,132	160,000	80,000	253	3,772,385
2 (2017 Estimate)	160,000	40,000	600,000	280,000	300,000	160,000	80,000	253	1,620,253
3 (2018 Estimate)	160,000	40,000	600,000	280,000	300,000	160,000	80,000	253	1,620,253
<b>Total</b>	<b>480,000</b>	<b>120,000</b>	<b>1,800,000</b>	<b>840,000</b>	<b>3,052,132</b>	<b>480,000</b>	<b>240,000</b>	<b>759</b>	<b>7,012,891</b>
<b>Annualized</b>	<b>160,000</b>	<b>40,000</b>	<b>600,000</b>	<b>280,000</b>	<b>1,017,377</b>	<b>160,000</b>	<b>80,000</b>	<b>253</b>	<b>2,337,630</b>

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## **INFORMATION COLLECTION SUPPORTING STATEMENT**

### **TSA Pre✓<sup>®</sup> Application Program OMB Control Number 1652-0059**

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

Applicants who enroll through TSA's current program are required to pay a non-refundable fee of \$85.00 when enrolling.

For individuals who 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 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 STA programs. TSA extrapolated data based on customer service inquiries and TSA support provided to applicants who have had questions or who requested assistance/guidance for submitting requests to TSA. As a result, the costs will vary since some individuals 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:

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**Table 14: Estimated Application Enrollment Cost Burden**

Calendar Year (CY)	Total TSA Pre✓® Application Program Annual Enrollments	TSA Pre✓® Application Program Annual Enrollment Fee: \$85	Total TSA Pre✓® Application Program Annual Enrollments Fee	Post-Enrollment Biometric Fee*	Total Program Estimated Fee
		<b>\$85</b>		<b>\$15.00</b>	
Column	A	B	C=A*B	D	E=C+D
1 (2016 Estimate)	800,000	\$85	\$68,000,000	\$36,781,973	\$104,781,972.50
2 (2017 Estimate)	800,000	\$85	\$68,000,000	\$4,500,000	\$72,500,000.00
3 (2018 Estimate)	800,000	\$85	\$68,000,000	\$4,500,000	\$72,500,000.00
<b>Total</b>	<b>2,400,000</b>	<b>\$85</b>	<b>\$204,000,000</b>	<b>\$45,781,973</b>	<b>\$249,781,972.50</b>
<b>Annualized</b>	<b>800,000</b>	<b>\$85</b>	<b>\$68,000,000</b>	<b>\$15,260,658</b>	<b>\$83,260,657.50</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 15: Estimated Correction of Record Cost Burden**

Calendar Year (CY)	Correction of Records Requests	Average Cost for a Correction of Record Request: \$1	Total Correction of Record Cost Burden
Column	A	B	C = A*B
1 (2016 Estimate)	253	\$1	\$253
2 (2017 Estimate)	253	\$1	\$253
3 (2018 Estimate)	253	\$1	\$253
<b>Total</b>	<b>759</b>	<b>\$1</b>	<b>\$759</b>
<b>Annualized</b>	<b>253</b>	<b>\$1</b>	<b>\$253</b>

The maximum annual total cost burden for the TSA Pre✓® Application Program is estimated to be **\$83,260,911** based on the sum of Total Application Enrollment Costs and Total Correction of Record Costs.

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**Table 16: Estimated Total Annual Cost Burden**

<b>Calendar Year (CY)</b>	<b>Total Application Enrollment Cost Burden</b>	<b>Total Correction of Record Cost Burden</b>	<b>Total Cost Burden</b>
Column	A	B	C = A+B
1 (2016 Estimate)	\$104,781,973	\$253	\$104,782,226
2 (2017 Estimate)	\$72,500,000	\$253	\$72,500,253
3 (2018 Estimate)	\$72,500,000	\$253	\$72,500,253
<b>Total</b>	<b>\$249,781,973</b>	<b>\$759</b>	<b>\$249,782,732</b>
<b>Annualized</b>	<b>\$83,260,658</b>	<b>\$253</b>	<b>\$83,260,911</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 cost to the Government for STAs is recovered in the fee charged to TSA Pre✓<sup>®</sup> Application Program applicants (estimates are reflected in table 14 above). Fees collected must cover not only initial costs but also the technology and operational costs over the five-year period that the applicant’s STA is valid. As noted above in the response to question #4, in relation to start-up costs, TSA leveraged existing information technology infrastructure and systems, and other established processes to collect information and conduct the STA for the TSA Pre✓<sup>®</sup> Application Program.

The current TSA Pre✓<sup>®</sup> Application Program contractor charges 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 incurs 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 \$72.25 and ensures that each program participant pays an equitable portion of the costs to run the program.

The FBI Fee component is designed to fully recover the cost that the FBI imposes to conduct a CHRC. As part of the STA, 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. FBI has



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set the fee at \$12.75. See Notice, FBI Criminal Justice Information Services Division; Revised User Fee Schedule, 79 FR 207 (October 27, 2014).

TSA collects the total fee at the time of application in accordance with TSA-approved payment methods. TSA does not issue fee refunds once vetting services have commenced. Further, TSA does 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✓<sup>®</sup> Application Program KTN, and the underlying STA, are valid for a maximum of five years or until a disqualification occurs. Disqualifications are found through recurrent daily vetting conducted on existing, approved members of the TSA Pre✓<sup>®</sup> Application Program as well as through external notification of potential disqualifications or individuals who self-report that they committed disqualifying offenses to TSA.

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

As stated above, TSA intends to expand enrollment providers to increase applications. Also, TSA adjusted the burden estimates based on the current program data from 2014.

***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 or release results from this information collection, including information gained through the customer satisfaction survey.

***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 does not seek any exception to the certification statement.