

INFORMATION COLLECTION SUPPORTING STATEMENT

Traveler Redress Inquiry Program (TRIP)

OMB Control Number 1652-0044

EXP. October 31, 2015

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information (annotate the CFR parts/sections affected).

The *Implementing Recommendations of the 9/11 Commission Act of 2007* (Pub.L. 110-53; 121 Stat. 266 (Aug. 3, 2007) (9/11 Act) requires the Department of Homeland Security (DHS) to provide a—

timely and fair process for individuals who believe they have been delayed or prohibited from boarding a commercial aircraft because they were wrongly identified as a threat under the regimes utilized by the Transportation Security Administration, United States Customs and Border Protection, or any other office or component of the Department of Homeland Security.

See sec. 1606 of the 9/11 Act as codified at 49 U.S.C. 44926(a). Congress further directed the Secretary to establish an “Office of Appeals and Redress” to implement, coordinate, and execute the redress process. *Id.* § 44926(b). In February 2007, DHS TRIP was officially launched as the central processing point for redress inquiries. On December 10, 2007, the Secretary designated the TSA Office of Transportation Security and Redress, currently known as the Transportation Security Redress Branch, as both the lead agent to manage DHS TRIP and the statutorily-required “Office of Appeals and Redress.” In addition, TSA is charged with establishing “a procedure to enable airline passengers, who are delayed or prohibited from boarding a flight because the advanced passenger prescreening system determined that they might pose a security threat, to appeal such determination and correct information contained in the system.” 49 U.S.C. § 44903(j)(2)(C).

The DHS Traveler Redress Inquiry Program (DHS TRIP) was developed by DHS, in cooperation with the Departments of State (DOS) and Justice (DOJ), to provide a one-step portal for individuals to request redress. Persons may voluntarily seek redress if they believe that they have been (1) denied or delayed boarding; (2) denied or delayed entry into or departure from the United States at a port of entry; (3) identified for additional (secondary) screening at our Nation’s transportation hubs, including airports, seaports, train stations, and land borders; or (4) otherwise been subjected to violations of their civil rights or privacy rights while boarding, entering, or being screened in connection with travel.

The Transportation Security Redress Branch (TSRB) of TSA is responsible for the day-to-day operations of DHS TRIP. The TSRB manages the DHS TRIP program, providing traveler redress intake and processing support, while working with relevant DHS components, DOS, and law enforcement and intelligence agencies to review the submissions and reach a determination about traveler status. Other DHS components include, but are not limited to, the DHS Office for

Civil Rights and Civil Liberties (CRCL), DHS Privacy Office (PRIV), U.S. Citizenship and Immigration Services (USCIS), U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and the Office of Biometric Identity Management (OBIM) in the National Protection and Programs Directorate (formerly, U.S. VISIT). DHS TRIP external program partners include the Federal Bureau of Investigation Terrorist Screening Center (TSC) along with DOS Bureau of Consular Affairs. This group of DHS components and other Federal agencies is collectively referred to as the “program partners” for purposes of this supporting statement.

This collection of information includes: (1) a modification to the existing Traveler Inquiry Form (TIF) so as to enhance the redress process for certain individuals and ensure that the redress process is fair and responsive; and (2) two optional, anonymous customer satisfaction surveys to allow the public to provide DHS feedback on its experience using DHS TRIP. One survey requests feedback on the public’s experience using the DHS TRIP website and will be administered at the time of use and the other questionnaire requests feedback on the public’s experience using DHS TRIP as a whole and will be administered 90 days after the respondent’s case is closed. TSA sought and received approval for these surveys in a previous renewal period. However, TSA has not yet implemented these surveys due to technical challenges with the survey tool, which have since been resolved. TSA anticipates implementing the surveys within six months of OMB approval of this renewal. TSA will conduct the customer satisfaction surveys in accordance with the DHS Office of the Inspector General, *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program*. Recommendation #24 of the report called upon DHS TRIP to “collect and report on redress-seeker impressions of the TRIP website, different aspects of the redress experience, and their overall satisfaction with the program, with the aim of using this information to identify areas for improvement.”

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

In operating the DHS TRIP program, the TSRB and its program partners use the information obtained in the TIF to process redress requests. Regarding the surveys, in which DHS will request that applicants for redress complete two voluntary customer satisfaction surveys following the completion of the TIF on the website or after they have received a response letter signaling the end of the redress process, these five-question surveys request that applicants score various aspects of the redress process and the website on a 1-5 scale, where 1 is very unsatisfied and 5 is very satisfied. DHS will use the information obtained in the customer satisfaction surveys to analyze customer satisfaction when using the redress application process and to identify ways to improve the process from the customer’s perspective.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which

addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]

DHS has developed an online system to support DHS TRIP. In compliance with the Government Paperwork Elimination Act (GPEA), individuals can download the TIF on the DHS TRIP website at <http://www.dhs.gov/trip>. Under this program, individuals can complete the TIF online through a “smart” form that collects the personal information necessary to process and address their request. Applicants, however, are required to submit government-issued travel documents via email or mail. Individuals who are U.S. citizens can submit a legible copy of an unexpired U.S. passport. If the individual does not have a U.S. passport, he/she can provide at least one legible copy of an unexpired, government-issued, photograph-bearing identification document. For minors (individuals under the age of 18), a copy of either a certified birth certificate or a passport is the only identification document required. Persons who do not possess a U.S. passport or who are non-U.S. citizens may submit a copy of the following: passport; passport card; driver’s license; government identification card (Federal/state/local/tribal number); birth certificate (only for individuals under the age of 18); military identification card; certificate of citizenship; naturalization certificate; immigrant/non-immigrant visa; alien registration card; petition or claim receipt; I-94 admission form; FAST Card; SENTRI Card; NEXUS Card; or Border Crossing Card.

If desired, an individual may print the TIF and submit the completed form, along with at least one unexpired, government-issued, photograph-bearing identification document via mail or email. All new redress requestors are directed to the DHS TRIP website, which is intended to be the primary point of contact with individuals who feel they have been (1) denied or delayed boarding, (2) denied or delayed entry into or departure from the United States at a port of entry, (3) identified for additional screening at our Nation’s transportation hubs, including airports, seaports, and land borders, and (4) otherwise subjected to violations of their civil rights or privacy rights while boarding, entering, or being screened in connection with travel. Based on current trends, DHS expects that approximately 80% of travelers seeking redress will submit their initial requests electronically, with 70% of these redress seekers submitting identifying documents by email, and 20% submitting the documents by regular mail. For individuals with limited access to computers or the internet, the TIF form is available by contacting the TSA Contact Center, and the TSBP will send the form by mail.

The customer satisfaction survey will be accessed and completed through the DHS TRIP website following completion of the TIF. The second survey will be sent and responses received by email or mail.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.

There is no similar information available within DHS that can be used or modified for this program. This information is collected on a one-time basis from individuals requesting redress for a situation or event in the past in which he or she experienced a screening-related difficulty

during travel. Existing information within the possession of DHS does not address these questions.

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 the burden.

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

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If DHS did not conduct the TIF information collection, it would not be able to provide an accelerated and effective redress process for individuals who believe they have been incorrectly delayed or denied boarding as a result of the passenger screening process. If DHS conducted the collection less frequently, it would not be fulfilling its mandate in the 9/11 Act to provide timely redress to the public. If DHS does not administer the surveys, it will not have a direct feedback loop, which will allow us to make specific, customer-driven process improvements. Furthermore, if customers are not surveyed to determine the ease of the redress application process and whether the redress process met their expectations, DHS would be unable to ascertain whether modifications to DHS TRIP support the DHS objective of enhancing quality customer service. By administering customer satisfaction surveys, DHS will be better prepared to make meaningful and substantive modifications to DHS TRIP to effectuate this objective, consistent with Recommendation #24 from the DHS Office of the Inspector General, which in its *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program* called upon DHS TRIP to “collect and report on redress-seeker impressions of the TRIP website, different aspects of the redress experience, and their overall satisfaction with the program, with the aim of using this information to identify areas for improvement.”

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

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

8. Describe the efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Specifically address comments received on cost and hour burden.

To implement DHS TRIP, an advisory board was established with representation from the program partners. Additionally, a working group was established with representatives from the program partners to make improvements to the underlying system and identify necessary information that needs to be collected to conduct an effective redress program. Among other things, the working group considered Recommendation # 24 from the DHS Office of the Inspector General's *Report on Effectiveness of the Department of Homeland Security Traveler Redress Inquiry Program*, which recommended that DHS collect additional data to document, report, and take steps to improve redress-seekers' impressions of the DHS TRIP website, different aspects of the redress experience, and overall satisfaction with DHS TRIP.

As the Executive Agent for DHS TRIP, TSA published a 60-day notice in the *Federal Register* on May 6, 2015 80 FR 26084, and a 30-day notice on October 1, 2015, 80 FR 59172, as required by 5 C.F.R. § 1320.8(d) and received no comments.

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

No payment or gift will be provided to respondents.

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

No specific assurances of confidentiality will be provided to individuals. Information provided by individuals will be protected from disclosure to the extent appropriate under applicable provisions of the Freedom of Information Act, the Privacy Act of 1974, and, as applicable, 49 U.S.C. 114(r), as implemented by 49 C.F.R. part 1520, which limits the disclosure of Sensitive Security Information. Data is collected and transmitted in accordance with the Privacy Act. Individuals are advised of these statutory protections at the time of the submission of the application for redress. TSA published a Privacy Act system of records notice in the Federal Register, DHS/ALL-005 Department of Homeland Security Redress and Response Records System. See 72 FR 2294 (January 18, 2007). Also, a Privacy Impact Assessment, DHS/ALL/PIA-002(a) - DHS Traveler Redress Inquiry Program (TRIP), was published on June 5, 2013 on www.dhs.gov.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

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

Based on current contact volumes, DHS will receive approximately 15,000 redress requests per year. The annual response population was derived from data compiled from across all program partners.

Travelers seeking redress must complete and submit the TIF either via email, via mail, or via web portal, to DHS TRIP along with a copy of their U.S. passport or at least one unexpired, government-issued, photograph-bearing identification document. TSA estimates completing the form and gathering and submitting the information will take approximately one hour¹ (or 60 minutes). TSA calculates 15,000 hours as the total estimated annual hour burden for redress applicants. Table 1 displays the total estimated annual hour burden for passengers seeking redress.

Table 1 Estimated Annual Hour Burden for Passengers Seeking Redress

<i>Number of Annual Redress Applicants (TIF)</i>	<i>Time per Response (in hrs.)</i>	<i>Total Annual Hours</i>
15,000	1	15,000

TSA applies a passenger value of time wage rate of \$43.44² to estimate the opportunity cost of passengers seeking redress. Table 2 displays the total estimated hour burden opportunity cost for passengers seeking redress.

Table 2. Estimated Annual Opportunity Cost for Passengers Seeking Redress

<i>Total Annual Hours</i>	<i>Cost per Applicant</i>	<i>Total Annual Cost</i>
15,000	\$43.44	\$651,600

Furthermore, TSA estimates that approximately 10 percent³ of passengers seeking redress will complete an initial website review survey. TSA estimates that in addition, approximately 10 percent of passengers seeking redress will complete an overall satisfaction survey sent 90 days after case closure.

TSA estimates that completion for either survey will take approximately 10 minutes⁴. Thus, the total estimated annual hour burden for passengers responding to surveys is 500 total hours, 250 for each survey. Table 3 displays the total estimated hour burden for passengers completing surveys.

Table 3. Estimated Annual Hour Burden for Passenger Surveys

	<i>Number of Annual Survey Respondents*</i>	<i>Time per Response (in hrs.)</i>	<i>Total Annual Hours</i>
Initial Survey	1,500	0.17	250
After Case Closure	1,500	0.17	250

¹ Based on estimates received from DHS

² Revised Departmental Guidance on Valuation of Travel Time in Economic Analysis. Office of the Secretary of Transportation, U.S. Department of Transportation. http://www.dot.gov/sites/dot.gov/files/docs/USDOT%20VOT%20Guidance_0.pdf

³ Based on DHS estimates

⁴ Based on DHS estimates

Total	3,000		500
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**TSA plans to administer two surveys: an initial survey when an applicant applies and another survey 90 days after case closure. Survey respondents will be a subset of redress applicants.*

TSA applies the passenger value of time wage rate to estimate the opportunity cost of passengers completing surveys. Each survey respondent will take 10 minutes (or 0.17 hours) to take the survey. This is multiplied by the survey respondent's value of time, which is assumed to be the passenger value of time, \$43.44 per hour (0.17 hours x \$43.44 = \$7.24). The annual total for all survey respondents is calculated by multiplying the total annual hours for all respondents (250 hours for each survey) by the burden per survey respondent (\$7.24). Table 4 displays the total estimated hour burden opportunity cost for passengers applying for redress who complete surveys.

Table 4. Estimated Annual Opportunity Cost for Passenger Surveys

	<i>Total Annual Hours</i>	<i>Burden per Survey Respondent (10 minutes per Survey Respondent)</i>	<i>Total Annual Burden</i>
Initial Survey	250	\$7.24	\$1,810
After Case Closure	250	\$7.24	\$1,810
Total	500		\$3,620

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

DHS estimates the total annual cost burden for travelers applying to DHS TRIP to be approximately \$3,375. The costs to travelers involve costs associated with mailing the TIF and identity documentation. Because DHS TRIP enables customers to submit identity documents by email, standard mail, or web portal, not all respondents bear the cost of mailing documentation. DHS estimates the cost to mail the documentation is \$.75 via regular mail. Based on the current volume of forms received by DHS TRIP, it can be assumed that 20% of applications to DHS TRIP will continue to be sent via standard mail, 40% by email, and 40% via the website. The estimated annual burden for mailing the submission is \$2,250 calculated as follows: 15,000 applicants x 0.2 x \$.75 = \$2,250.

Applications sent through the website must be accompanied with a signed Traveler Inquiry Form acknowledgement page, along with identifying documentation. DHS expects that the population of respondents who submit online will exhibit different behavior than the general population and will provide the additional documentation via web portal 70% of the time, via mail 10% of the time, and via email 20% of the time. The online applicant costs are calculated as follows: 15,000 applicants x (0.1) x \$.75 = \$ 1,125.

<i>Mail Application Costs (a)</i>	<i>Web Site Application Costs (b)</i>	<i>Total Cost (c = a + b)</i>
\$2,250	\$1,125	\$3,375

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

DHS TRIP does not anticipate costs to the Federal Government as a result of using the revised TIF for or implementing the two surveys beyond expected and usual staff hours. The cost for the collection of data used in processing redress requests involves cost associated with labor. A contracting staff is used to collect 80% of the information. The remaining portion of the collection process is conducted using 1.5 Full Time Equivalent (FTE). The cost breakdown for the contractor support is as follows:

- 7 contractors are used for data collection at an average rate of \$57.00 hour for support of data collection
- Approximately 1,006 hours annually are spent on data collection by the contractors
- $\$57.00 \times 7 \times 1,006 = \$401,394$

The cost breakdown for the Federal Staff is as follows:

- 1 full time program analyst at a fully loaded F-band salary of \$66,621
- Half time program analyst at fully loaded G-band salary of \$85,890
- $\$66,621 + (\$85,890 \times \frac{1}{2}) = \$109,566$

<i>Description</i>	<i>Cost</i>
Contractor Support	\$401,394
Federal Staff (1.5 FTE)	\$109,566
TOTAL	\$510,960

TSA may mail applications to respondents if needed. TSA estimates that 20% of the 15,000 applicants submit information by mail, or 3,000 respondents. To mail the applications, TSA estimates the cost is the same as the cost for applicants to mail in the documentation as discussed above, \$0.75. Thus, the estimated annual burden for TSA to mail the application is \$2,250 calculated as follows: $15,000 \text{ applicants} \times 0.2 \times \$0.75 = \$2,250$.

TSA estimates the total cost to the federal government to be \$513,210 ($\$510,960 + \$2,250$).

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

DHS has made adjustments to the burden estimates based on actual redress requests for the majority of changes requested to the TIF. However, in April 2015, the Government undertook enhancements for a revised redress process for U.S. citizens and lawful permanent residents who have been denied boarding on a commercial aircraft because they are on the No Fly List. These changes were designed to ensure that the redress process is fair and responsive. As the changes only apply to applications from U.S. Persons (citizens or permanent residents), DHS TRIP must now differentiate between U.S. Persons and non-U.S. Persons. As a result, DHS has modified

the TIF to include a new field requesting whether one is a U.S. Person or non-U.S. Person as well as requiring respondents to provide their place of birth. While a program change, DHS notes that supplying this information should not impact the TIF burden estimates.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of the proposed collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

DHS will display the OMB number and 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.

No exceptions are claimed.