

**SUPPORTING STATEMENT FOR
APPLICATION FOR TRAVEL DOCUMENT (CARRIER DOCUMENTATION)
OMB Control No.: 1615-NEW
COLLECTION INSTRUMENT(S): FORM I-131A**

A. Justification

- 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.**

Generally, the Immigration and Nationality Act (“Act”) requires that an alien seeking admission to the United States must have a valid and unexpired passport and a valid and unexpired immigrant or nonimmigrant visa. In some circumstances, an alien may be authorized to present a travel document other than a visa. Traditionally, Form I-131 has been used to apply for one of three different types of travel documents.

An alien who has already been lawfully admitted as lawful permanent resident (“LPR”), whether or not on a conditional basis, may generally use the LPR’s permanent resident card (Form I-551) as a travel document, if the LPR has been absent for not more than one year, or in other situations specified in 8 CFR 211.1.

U.S. Citizenship and Immigration Services (USCIS) has created Form I-131A, Application for Travel Document (Carrier Documentation), to allow LPRs to request a Travel Permit (transportation letter or boarding foil) at a U.S. Embassy or U.S. Consulate. An approved I-131A will allow a commercial carrier to board the LPR on a vessel or aircraft destined for the United States without transportation carrier liability.

Applicants may be required to submit biometric information if the regulations or form instructions require such information or if requested in accordance with 8 CFR 103.2(b)(9). DHS may collect and store for present or future use, by electronic or other means, the biometric information submitted by an individual. DHS may use this biometric information to conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws. See 8 CFR 103.16.

The Department of State (DOS) and/or DHS will conduct background, security and identity checks on all applicants that request a Travel Document (Transportation Letter or Boarding Foil). Applicants may be required to appear for an interview and submit biometrics information at a U.S. Embassy, U.S. Consulate or DHS office overseas.

Authorities: 8 U.S.C. §§ 1103, 1158, 1182, 1203 and 1204

- 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.

Form I-131A has a single use. A lawful permanent resident, who is traveling overseas and is not in possession of a valid, unexpired Permanent Resident Card or other evidence of lawful permanent resident status, may use this form to apply for a Travel Document within one year of his or her last departure from the United States. The lawful permanent resident must submit the application in person at a U.S. Embassy or U.S. Consulate. The decision on Form I-131A is entirely discretionary and may not be appealed. Furthermore, DHS may revoke or terminate a Travel Document at any time.

If the Form I-131A is approved, DOS or DHS will issue a Travel Document, generally valid for 30 days, which will allow the lawful permanent resident to board a vessel or aircraft, travel to the United States, and present him or herself at a U.S. port-of-entry for inspection as a returning lawful permanent resident. A Travel Document is not a guarantee of admission or other form of entry into the United States, and U.S. Customs and Border Protection (CBP) will carry out all required inspection procedures upon the alien's arrival at a U.S. port of entry.

- 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.**

The use of this information collection provides the most efficient means for collecting and processing the required data. Form I-131A can be accessed, completed electronically by visiting USCIS Website [LINK TO BE ADDED WHEN AVAILABLE] and submitted in paper-format at a U.S. Embassy or U.S. Consulate. Prior to appearing at a U.S. Embassy or U.S. Consulate to file Form I-131A, the filing fee must be submitted through the USCIS online filing system on the USCIS Website. Respondents will be directed to make their fee payment via the collection approved at 1615-0131 (USCIS Electronic Payment Processing).

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

This USCIS program impose no duplication of efforts because similar information that can be used to determine eligibility for a Travel Document is not collected through other USCIS or other federal agency collections or programs. USCIS requires these applicants to provide a passport-style photograph while it requires others to appear at a USCIS Application Support Center (ASC) to provide an electronic photograph and fingerprints, depending on the person's location and the benefit requested.

USCIS has also investigated the information that may be obtained from other Federal programs and agencies. The information necessary to determine if the alien is eligible to request a Travel Document is not available through other Federal sources.

Neither USCIS, nor any other federal agency, has a form for the specific purpose of collecting information or fees to process requests for Travel Documents. DOS and DHS currently use informal means of collecting this information, but this process is not consistent and does not provide a mechanism for the collection of fees for this specific service. USCIS is creating Form I-131A to facilitate the collection of information and fees from applicants for processing requests for Travel Documents, and to provide the public with uniform instructions for requesting documents overseas.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This collection of information does not have an impact on small businesses or other small entities.

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

The collection of this information is required to verify the status of permanent or conditional residents, and determine whether the applicant is eligible for the requested Travel Document. The lack of such documentation will result in LPRs who travel abroad not being able to apply for readmission into the United States.

If USCIS does not create Form I-131A, there will continue to be no uniform process for lawful permanent residents to request a Travel Document while overseas. The creation of a form and the establishment of a processing fee for requesting Travel Documents will enable U.S. Embassies and U.S. Consulates to provide more efficient service to qualified lawful permanent residents who, without other evidence of lawful permanent resident status, are unable to board a vessel or aircraft destined for the United States.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances applicable to this information collection. This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 4th, 2016 USCIS published a Notice of Proposed Rulemaking at 81 FR 26904. USCIS did receive comments after publishing that notice and the responses are contained in the final rule. On October 24, 2016, USCIS published a Final Rule in the Federal Register at 81 FR 73292.

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

USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.

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

There are no confidentiality assurances for other aliens applying for the benefit.

The system of record notices associated with this information collection are:

- the USCIS Benefits Information System, which was published in the Federal Register on September 29, 2008 at 73 FR 56596;
- the Alien File, Index, and National File Tracking System of Records published in the Federal Register on November 21, 2013 at 78 FR 69864; and
- the Electronic Immigration System-2 Account and Case Management System of Records published in the Federal Register on April 5, 2013 at 78 FR 20673.

The privacy impact assessments (PIAs) associated with this information collection are:

- the USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum, dated September 5, 2008;
- the Electronic Immigration System (ELIS 2) Account and Case Management, dated May 16, 2012; and the forthcoming DHS-USCIS-PIA-056 USCIS ELIS Update.
- Case and Activity Management for International Operations (CAMINO) dated May 26, 2015.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to person’s from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14**

| Type of | Form | No. of | No. of | Avg. | Total | Avg. | Total Annual |
|---------|------|--------|--------|------|-------|------|--------------|
|---------|------|--------|--------|------|-------|------|--------------|

| Respondent | Name /Form Number | Respondents | Responses per Respondent | Burden per Response (in hours) | Annual Burden (in hours) | Hourly Wage Rate* | Respondent Cost |
|---------------------------|---|---------------|--------------------------|--------------------------------|--------------------------|-------------------|--------------------|
| Individuals or Households | Application for Travel Document (Carrier Evidence), Form I-131A | 15,000 | 1 | .92 hours | 13,800 | \$32.52 | \$448,776 |
| Individuals or Households | Biometrics ** | 15,000 | 1 | 1.17 hours | 17,550 | \$32.52 | \$570,726 |
| Total | | 15,000 | | | 31,350 | | \$1,019,502 |

* The above Average Hourly Wage Rate is the [May 2015 Bureau of Labor Statistics](#) average wage for “All Occupations” of \$23.23 times the wage rate benefit multiplier of 1.4 (to account for fringe benefits) equaling \$32.52. The selection of “All Occupations” (for example) was chosen as the expected respondents for this collection could be expected to be from any occupation.

** Biometrics may be required at the time of any interview or other appearance at a U.S. Embassy or U.S. Consulate, to verify identity and/or update background and security checks.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and, (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment

process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995; (2) to achieve regulatory compliance with requirements not associated with the information collection; (3) for reasons other than to provide information or keep records for the government; or, (4) as part of customary and usual business or private practices.**

This information collection may impose some additional out-of-pocket costs to respondents in addition to the time burden for the form's preparation. Some I-131A respondents may incur expenses to obtain certain records, form preparation assistance, legal services, translators, costs to obtain passport-style photographs and document search and generation, USCIS estimates that the average cost for these activities is \$490. Since this is a new program USCIS is seeking to establish, an estimate for these additional expenses is not available as USCIS is unable to determine how many applicants may incur this cost.

The estimated cost to respondents related to the submission of Form I-131A is calculated as 15,000 respondents x \$490 = \$7,350,000.

There is a fee of \$575 required with the filing of Form I-131A.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Annualized Cost Analysis

| | | |
|-----------------------------------|-----------|------------------|
| a. Printing Cost | \$ | 0 |
| b. Collection and Processing Cost | \$ | 8,625,000 |
| c. Total Cost to Program | \$ | 8,625,000 |

Government Cost Analysis

The estimated cost to the government, which is funded by USCIS user fee collections, is calculated by multiplying the estimated number of I-131A respondents (15,000) x the fee charge for the collection (\$575). The total cost includes the suggested hourly rate for clerical, officer and managerial time with benefits, plus a percent for the estimated overhead cost for printing, stocking and distributing and processing of this form.

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

There has been no change in the total burden hours. There has been no change in the out of pocket expenses; there is an increase in the fee.

- 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.**

USCIS does not intend to employ the use of statistics or the publication thereof for 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.**

USCIS will display the expiration date of OMB approval for this information collection.

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

USCIS does not request an exception to the certification of this information collection.