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## INFORMATION COLLECTION SUPPORTING STATEMENT

### TSA Pre✓<sup>®</sup> Application Program OMB Control Number 1652-0059 Exp. 11/30/2017

- 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 a statutory mandate to establish and collect a fee for any registered traveler program by publication of a notice in the *Federal Register*, as outlined in section 540 of 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 that determines whether passengers are low risk and thus eligible to receive expedited screening at participating U.S. airport security checkpoints. The TSA Pre✓<sup>®</sup> Application Program enhances aviation security by permitting TSA to better focus its limited security resources on passengers who are not known to TSA, while also facilitating and improving the commercial aviation travel experience for the public.

TSA uses the information provided by applicants to conduct security threat assessments (STAs) of the applicants. 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. 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.

After five years, those who wish to continue participating in the program must re-enroll to renew. For those program participants whose eligibility is expiring, TSA will offer online re-enrollment to applicants eligible to renew. TSA will use a combination of previously provided biographic and biometric data along with updated applicant data (*e.g.*, address, alien registration number/passport number, eligibility questions, updated biometrics if applicable, etc.) and the associated fee to conduct a new STA. Individuals meeting certain criteria (*e.g.*, applicants who have changed their name, applicants with low quality fingerprints, etc.) will

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require in-person re-enrollment. 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.

- 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 mail, or post-enrollment fax. In addition, TSA offers online pre- or post-enrollment information submission of application information such as identity and citizenship or immigration documents/data before or after an applicant's in-person enrollment. 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, and/or facial image) and identity and citizenship/immigration documents they did not provide online. They may verify any information they submitted during online pre-enrollment at a workstation or via tablet. Alternatively, applicants may choose to enroll entirely in person at an enrollment center without pre-enrolling, where they may submit their information at a workstation or via tablet. For those individuals eligible to renew, most applicants will be able to complete their renewal online. For individuals who completed an online renewal and did not provide a facial image and/or iris scan during their initial TSA Pre✓<sup>®</sup> Application Program enrollment, TSA will offer a capability to provide biometric data post-enrollment.

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 10-finger biometric submission. The FBI may retain applicants' fingerprints and associated information in its Next Generation Identification (NGI) system after the completion of their application and, while retained, their fingerprints may continue to be compared against other fingerprints submitted to or retained by NGI for the purposes of recurrent criminal history record vetting. Similarly, TSA will also submit applicant information, including fingerprints and other biometrics, to other DHS systems to complete TSA's security threat assessment, such as DHS' IDENT system for the determination of initial and continued eligibility in the program, for recurrent vetting, and for identity verification at airport security checkpoints.

All applicants pay a non-refundable application fee to TSA's contractor using a credit card, cashier's check, or money order. Applicants who complete initial enrollment or in-person re-enrollment pay at the time of enrollment at an enrollment center. Applicants who complete online renewals pay during the online renewal process. A portion of this non-refundable fee is used to cover TSA's costs in conducting the STA. TSA's contractor currently operates

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roughly 350 enrollment locations and offers temporary enrollment center capability as well. TSA's contractor offers an optional customer satisfaction survey at the conclusion of the enrollment and renewal processes.

Individuals who apply to the TSA Pre✓<sup>®</sup> Application Program are notified of their eligibility for the program by TSA after completion of the STA. Approved applicants to the TSA Pre✓<sup>®</sup> Application Program are issued a KTN to use when making travel reservations. Currently, the KTN is provided to the applicant via a letter and website, and notification that TSA has finished an applicant's STA is also sent via email (if an email address was provided by the applicant), but TSA is planning to implement the capability to provide the application status notification through text or phone. When issuing the KTN, TSA provides the applicant with a document explaining the roles and responsibilities associated with the use of the KTN. TSA Pre✓<sup>®</sup> Application Program participants who submit their KTN when making flight reservations for transmission by an airline to TSA are eligible for expedited screening on flights originating from U.S. 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 is valid for five years after issuance, unless a disqualification occurs or as stated by the terms and conditions of his or her enrollment.

TSA uses the biographic and biometric information collected to conduct STAs, using law enforcement, citizenship or immigration, regulatory violation, and intelligence databases, but also uses the information for identity verification. To improve identity verification at airport security checkpoints, TSA is revising this information collection request to include regular collection of facial image biometrics both when first applying for the TSA Pre✓<sup>®</sup> Application Program and when existing program participants provide such biometrics post-enrollment. TSA launched a proof of concept initiative at Hartsfield-Jackson Atlanta International Airport and Denver International Airport to determine whether fingerprints from TSA Pre✓<sup>®</sup> Application Program applicants who volunteer to participate in the proof of concept can be used as identity verification at airport checkpoints. TSA is using the results from this initiative to provide operational throughput information to determine how to optimally implement the use of biometrics collected during enrollment (fingerprints, iris, and/or facial image) at airport checkpoints for identity verification. TSA is expanding its collection of biometrics, including facial images, to permit the use of these biometrics for identity verification at the time of travel.

TSA uses the applicants' information to vet potential TSA Pre✓<sup>®</sup> Application Program participants by conducting STAs; accept into the Program applicants who receive an approved STA result; prescreen travelers in TSA's Secure Flight program prior to their travel when they include their KTNs 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 are determined to pose or are suspected of posing a threat to transportation or national security; and assist contractors and their agents, grantees, experts, consultants,

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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. TSA also uses the information collected to verify the KTN and KTN-holder information to determine a KTN holder's eligibility to participate in other TSA or DHS security programs, such as potential eligibility for a reduced fee for another program that also requires a security threat assessment or used in coordination with other DHS security programs, such as other DHS trusted traveler programs.

The optional customer satisfaction survey is designed to gauge the experience and customer satisfaction of applicants at enrollment centers as well serve as a gauge of customers' potential utility and frequency of KTN usage. TSA also 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. TSA is also revising the information collection request to include five additional survey questions regarding customer satisfaction and how customers learned about the TSA Pre✓<sup>®</sup> Application Program. See Supporting Statement Part B.

TSA will also begin to utilize applicant biographic, biometric, and passport-related information, if provided, during pre-enrollment, enrollment, or post-enrollment to facilitate identity verification and citizenship verification. These data will also be used to help with identity verification at the time of travel.

Finally, TSA will utilize applicant biographic and birth certificate information (*e.g.*, birth certificate number), if provided, during pre-enrollment, enrollment, or post-enrollment to facilitate citizenship verification.

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

Beginning in calendar year 2016, the TSA Pre✓<sup>®</sup> Application Program contractor separately offered as an option to applicants a service that provides real-time electronic certification of birth certificates for applicants who do not bring documents proving U.S. citizenship to their in-person enrollment. This option is offered as a service of, 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 of providing the service.

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- 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 in person at a workstation or via tablet or online. All applicants submit biometric data such as fingerprints, iris, and/or facial images 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) are used for the TSA Pre✓<sup>®</sup> Application Program population. Based on current data from the existing TSA Pre✓<sup>®</sup> Application Program, for applicants completing an initial enrollment (*i.e.*, not renewing an existing enrollment in the program), TSA estimates that about 80 percent of applicants will submit their biographic information online before going in person to an enrollment center to complete the application process and about 20 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 after their initial in-person enrollment to provide additional biometric data such as a facial image and/or iris scans if not provided initially. TSA estimates that 20 percent of applicants will provide citizenship or immigration data or documents online and 10 percent of applicants will provide this information via mail or fax.

Finally, TSA estimates that approximately 95 percent of renewals will occur online and that approximately five percent of applicants will either choose to renew in person or will be required to renew in person due to criteria such as a name change or low-quality fingerprints.

- 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.***

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 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 TSA Pre✓<sup>®</sup> Application Program, has 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

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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 an STA to identify low-risk travelers. To avoid duplication, and because they have been subject to a similar STA, TSA has made participants 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 threat assessments, such as members of the Armed Forces, Federal judges, and Executive Branch personnel with certain security clearances. Efforts to add additional government personnel continue.

Second, TSA leverages existing information technology infrastructure and established processes used for its TWIC and HME Threat Assessment 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 TSA Pre✓<sup>®</sup> Application Program at much lower costs.

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, 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 or other data or documents that demonstrate citizenship or immigration eligibility. Furthermore, TSA will request that applicants provide an iris scan and/or facial image 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 matched individuals with similar names. TSA also collects certain 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 <https://www.dhs.gov/trusted-traveler-programs>. Second, TSA was able to leverage the existing STA technology and collection procedures for the TWIC and HME Threat Assessment Programs 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

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Program requirements would have required significant effort and resources from both CBP and TSA.

- 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. TSA has determined that in order to reduce applicant burden, most applicants will be allowed to re-enroll online in order to continue to be 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 solicit public comment on the revised information collection for the TSA Pre✓<sup>®</sup> Application Program in the *Federal Register*. See 82 FR 20910 (May 4, 2017). TSA received one comment in response to this notice. The commenter expressed concern about the use of biometrics, the length of TSA's retention of applicants' data, biometric data safeguarding, and possible mission creep stemming from the expanded

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collection and dissemination of applicants' biometric data. Regarding the use of biometrics, in compliance with the Privacy Act, TSA provides notice to individuals in the Privacy Act Statement provided to all applicants upon pre-enrollment and enrollment.<sup>1</sup> Further, TSA's use and sharing of biometric information under this program is authorized and proper as described in the TSA Pre✓<sup>®</sup> Application Program Privacy Act system of records notice (78 FR 55274 (September 10, 2013)) and the Privacy Impact Assessment (PIA) for the program.<sup>2</sup> TSA also reiterates that participation in the TSA Pre✓<sup>®</sup> Application Program is voluntary, and lack of participation does not deny individuals the ability to travel.

The commenter also suggested that TSA consider privacy-enhancing alternatives by allowing individuals to have a say in how their information is used and be given the option to have their information removed from TSA's databases. TSA retains the applicant data it receives in accordance with record schedules approved by the National Archives and Records Administration (NARA). TSA will retain records for individuals who are not a match or potential match to a watchlist for one year after the individual no longer has TSA Pre✓<sup>®</sup> eligibility. In addition, for those individuals who may originally have appeared to be a match to a watch list, but subsequently cleared, TSA will retain the records for at least seven years, or one year after TSA Pre✓<sup>®</sup> eligibility has been terminated, whichever is later. For individuals who are an actual match to a watch list or otherwise determined to pose a threat to transportation security, TSA will retain the records for 99 years, or seven years after TSA learns that an individual is deceased. TSA, with NARA's approval, has determined that these retention periods are sufficient to meet the agency's mission and business needs and are also consistent with the retention period of data associated with TSA's other security threat assessment programs. TSA has built robust privacy protections into the TSA Pre✓<sup>®</sup> Application Program as described in the program PIA.

In reference to the safeguarding of biometrics once TSA has collected them, TSA employees and contractors are required to limit data access to those employees and contractors who require the information in order to perform their official duties under the enrollment contract. All TSA data, including but not limited to personally identifiable information (PII), is protected according to DHS and TSA security requirements and policies. TSA employees and contractors using TSA information technology are 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.

Regarding the commenter's concern about mission creep, or the involuntary spread of government databases such as NGI and IDENT beyond their intended purposes, TSA's mission through the TSA Pre✓<sup>®</sup> Application Program is to identify low-risk air travelers for expedited screening through an assessment of intelligence databases, an applicant's lawful presence in the United States, and any available criminal history record information. Eligible applicants are granted expedited screening eligibility for a period of five years, but factors

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<sup>1</sup> The full text of the Privacy Act statement is linked at [https://office.ishare.tsa.dhs.gov/sites/oit/bmo/pr/PRA/Projects2/1652-0059, TSAPre-CheckApp/2017 Revision/Privacy Act Statement.docx](https://office.ishare.tsa.dhs.gov/sites/oit/bmo/pr/PRA/Projects2/1652-0059, TSAPre-CheckApp/2017%20Revision/Privacy%20Act%20Statement.docx).

<sup>2</sup> Available at <https://www.dhs.gov/publication/dhstsapia-041-tsa-pre-check-application-program>.



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may emerge between TSA's granting of TSA Pre✓<sup>®</sup> and the end of the five-year period that disqualify an applicant from eligibility. The submission of fingerprint information to NGI and IDENT allows TSA to utilize the recurrent biometric vetting of those systems' capabilities in order to gain a fuller, more precise, and most timely assessment beyond what is available solely during an applicant's enrollment. Biometrics also will be used to confirm the identity of TSA Pre✓<sup>®</sup> Application Program participants at airport security checkpoints.

In addition to the 60-day notice, TSA also published a 30-day notice for the extension of its information collection. See 82 FR 50663 (Nov. 1, 2017). TSA received two comments in response to this notice. Both commenters stated their opposition to the additional collection of biometric information, such as iris scans, and one commenter stated that the ongoing implementation of REAL ID requirements renders any additional biometric collection unnecessary. TSA reiterates that additional biometric collection is intended to enhance identity verification of known travelers at airport checkpoints, thus improving air travel security and easing the traveler experience for passengers. For example, the use of biometrics at airport checkpoints would allow travelers with KTNs to travel without presenting identity-proving documents, such as driver's licenses and boarding passes, creating a faster and more secure identity verification process.

One commenter also expressed concern that storing, sharing, and using additional biometric data violates applicants' privacy. TSA's collection and use of biometric data for the TSA Pre✓<sup>®</sup> Application Program are detailed and explained in the program's Privacy Impact Assessment, Systems of Records Notice, and Privacy Act statement, which are all publicly available online and/or provided to applicants at the time of enrollment. Sharing of biometric information with authorized and approved third parties allows TSA to conduct the timeliest security threat assessment to determine TSA Pre✓<sup>®</sup> eligibility, which is the program's purpose and mission. Application to the program is strictly voluntary, and refusing to apply to the program does not restrict travelers from flying.

The potential for data breaches and the theft of biometric data was an additional concern of both commenters. TSA addressed this concern in a similar comment submitted after the 60-day notice. All TSA data, including but not limited to PII, is protected according to DHS and TSA security requirements and policies. TSA employees and contractors using TSA information technology are 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. 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.

Lastly, one commenter stated that the use of additional biometric information such as iris scans are currently either used on a limited basis or as a pilot project. As such, the commenter believed there would not be any database for comparison. Since iris image

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collection would be used for future identity verification at the checkpoint, there is no need for a comparison database. TSA would compare iris scans collected at enrollment to iris scans conducted at the checkpoint. Due to the ease of collecting facial and iris images and the biometric recognition performance of face and iris recognition systems, TSA sees the efficiency in using iris and facial imagery in its checkpoint environments for several reasons. First, face and iris technologies have shown to produce imagery capable of matching more than 97 percent of individuals. In recent tests conducted by DHS Science & Technology (S&T), face and iris technologies were both able to accurately match one-to-many, or (1:N), more than 98 percent of the time, with expected improvements for one-to-one, or (1:1), matching. (A one-to-many biometric identification matching system compares a person's captured biometric template against multiple stored biometric templates in the system. A one-to-one biometric identification matching system authenticates a person's identity by comparing a captured biometric template with a stored biometric template that is associated with that individual.) Second, face and iris technologies have also demonstrated reliably quick speeds. DHS S&T testing has confirmed that face and iris technologies are able to collect imagery, identify an individual, and complete a transaction in less than six seconds. Finally, face and iris technologies have shown signs of public acceptance. During the DHS S&T evaluations, most volunteers asked to describe their experience after using this technology described face and iris technologies positively, due to the sanitary nature of non-contact systems and their ease of use.

**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). TSA also published a PIA for the program as described in the response to Question 8 above. See DHS/TSA/PIA-041 TSA Pre✓<sup>®</sup> Application Program (Sep. 4, 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.**

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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 holders, 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.

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

The TSA Pre✓® Application Program currently operates with roughly 350 enrollment locations. TSA uses historical data to project an estimated three-year total of **7,509,316** applicants and average of **2,503,105** applicants per year.<sup>3</sup> Table 1 displays the estimated population of initial and renewal enrollments for the TSA Pre✓® Application Program.

**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 Initial Enrollments</b>	<b>Total TSA Pre✓® Application Program Renewal Enrollments</b>	<b>Total TSA Pre✓® Application Program Annual Enrollments</b>
	A	B	C=A+B
2018	2,106,840	3,336	2,110,176
2019	1,924,972	623,780	2,548,752
2020	1,957,454	892,934	2,850,388
<b>Total</b>	<b>5,989,266</b>	<b>1,520,050</b>	<b>7,509,316</b>
<b>Annualized</b>	<b>1,996,422</b>	<b>506,683</b>	<b>2,503,105</b>

**\*Note: Table may not sum due to rounding.**

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

- Online pre-application (or pre-enrollment) before appearing at an enrollment center to complete the process at a workstation or via tablet;
- In-person at an enrollment center without online pre-enrollment providing data at a workstation or via tablet;
- In-person post-enrollment at an enrollment center to provide biometric data;

<sup>3</sup> Table 1 includes an estimated reenrollment population, as the TSA Pre✓® Application Program has a five-year renewal period for enrollees to continue with the program.

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- Online post-enrollment to upload additional enrollment information including valid identity and citizenship or immigration data or documents;
- Mail or fax of valid identity and citizenship or immigration documents; or
- Online for individuals eligible to complete an online renewal.

As stated above, biographic data may be provided online through pre-enrollment/renewal or in-person at the enrollment center. All initial applicants must visit an enrollment center in person to submit biometric information. Individuals renewing their enrollment may be eligible to conduct their renewal entirely online. 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 enrollment application and renewal process, applicants are also given the option to respond to a customer satisfaction survey. Biographic, payment, biometric, and survey information are submitted electronically by the program contractor to TSA or TSA's designated system(s).

Based on historical data from the TSA Pre✓<sup>®</sup> 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**

Type of Enrollment Data Submission	Estimated % of Applicants	Estimated Time Burden per Applicant (not including travel time, discussed below)
Online pre-application/pre-enrollment followed by in-person visit to an enrollment center	80% (initial applicants)	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>
In-person at an enrollment center with no pre-enrollment	20% (initial applicants)	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>

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Online renewal with no pre-enrollment	95% (renewals)	10 minutes total based on 10 min online renewal application
In-person renewal at an enrollment center	5% (renewals)	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	25% (all applicants)	2.5 minutes
In-person post-enrollment at an enrollment center to provide additional biometric data	50% (all applicants)	5 minutes
Online post-enrollment to upload valid identity and citizenship or immigration data or documents	20% (all applicants)	5 minutes
Mail or fax of valid identity and citizenship or immigration documents	10% (all applicants)	5 minutes

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✓® 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's contractor operates roughly 350 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✓® Application Program.

TSA reviewed a sample of data for TSA Pre✓® 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

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TSA calculated the distance and travel time between applicants’ residential address zip codes to their respective enrollment center zip codes. 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.

#### ***Initial Applicant Online Pre-Enrollment Followed by In-Person Enrollment Burden***

Currently, 80 percent of initial applicants pre-apply or pre-enroll online before visiting an enrollment center.

- For those individuals, TSA estimated the time burden as 19 minutes, which is the sum of the average online pre-enrollment time of 10 minutes and the average in-person enrollment time of 9 minutes for the collection of additional data elements such as facial image and iris scan and an applicant verification of biographic information provided during online pre-enrollment at a workstation or via tablet.
- 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.

Table 3 presents the calculation of the estimated total hour burden for applicants that choose online pre-application/pre-enrollment followed by in-person visit to an enrollment center.

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

<b>Calendar Year (CY)</b>	<b>Pre-Enrollment Applicants (80% of Initial Enrollments)</b>	<b>Hours to Pre-Enroll per Applicant (83 minutes = 1.38333 hours)</b>	<b>Total Hours</b>
	A	B	C=A*B
2018	1,685,472	1.383333333	2,331,569
2019	1,539,977		2,130,302
2020	1,565,964		2,166,250
<b>Total</b>	<b>4,791,413</b>		<b>6,628,121</b>

**\*Note: Table may not sum due to rounding**

#### ***Initial and Renewal Applicant In-Person Enrollment without Pre-Enrollment Burden***

Currently, approximately 20 percent of initial 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. TSA estimates that approximately five percent of applicants eligible for renewal will either be required to renew in person at an enrollment center or will choose to renew in person. While TSA will offer online pre-enrollment to these individuals, TSA estimates that most will elect to renew at an enrollment center without pre-enrollment. TSA estimates that the time burden for in-person renewals will be similar to the time burden for

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in-person enrollment without pre-enrollment burden. Applicant data may be captured and submitted at an enrollment center at a workstation or via tablet.

- TSA estimates that the collection of additional data elements such as biometric facial image or an iris scan and submission and verification of biographic information will continue to take an enrollment time of approximately 12 minutes.
- 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 4 below.

Table 4 presents the calculation of the estimated total hour burden for initial and renewal applicants that choose not to pre-apply/pre-enroll and provide data in person at an enrollment center.

**Table 4: Estimates for initial and renewal applicants that choose not to pre-apply/pre-enroll and provide data in person at an enrollment center**

Calendar Year (CY)	In-Person Initial Enrollments with no Pre-Enrollment (20% of Initial Enrollments)	In-Person Renewal Enrollments with no Pre-Enrollment (5% of Renewal Enrollments)	In-Person Enrollments with no Pre-Enrollment	Hours to Enroll per Applicant (76 minutes = 1.26667 hours)	Total Hours
	A	B	C= A+B	D	E = C*D
2018	421,368	167	421,535	1.266666667	533,944
2019	384,994	31,189	416,183		527,166
2020	391,491	44,647	436,138		552,441
<b>Total</b>	<b>1,197,853</b>	<b>76,003</b>	<b>1,273,856</b>		<b>1,613,551</b>

\*Note: Table may not sum due to rounding

### *Online Renewal*

TSA estimates that approximately 95 percent of applicants deciding to renew will complete their renewal application online. TSA estimates that this process will be a similar length of time as the current pre-enrollment process. The additional time required to process payment will be made up by a reduction in the amount of biographic data collected. This information is captured in Table 5 below.

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

Calendar Year (CY)	Online Enrollments with no Pre-Enrollment (95% of Renewal Enrollments)	Hours to Enroll Online per Applicant (10 minutes = 0.166666 hours )	Total Hours
	A	B	C=A*B
2018	3,169		528

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*\*Note: Table may not sum due to rounding*

**Customer Satisfaction Survey Burden**

After completing enrollment at the enrollment center or online renewal, applicants are provided the option to respond to a customer satisfaction survey. Based on current data, approximately 25 percent of applicants will choose to respond to the survey questions. TSA estimates the survey takes an average of 2.5 minutes to complete. The survey burden is derived from the estimated number of new enrollments from Table 1 multiplied by percentage of participation (25%) and the estimated time. Table 6 presents the calculation of the estimated total hour burden for applicants that choose to respond to a customer satisfaction survey.

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

<b>Calendar Year (CY)</b>	<b>Customer Survey Participants (25% of Enrollments)</b>	<b>Hours to Complete Survey per Applicant (2.5 minutes = 0.04167 hours)</b>	<b>Total Hours</b>
	A	B	C=A*B
2018	527,544	0.041666667	21,981
2019	637,188		26,549
2020	712,597		29,692
<b>Total</b>	<b>1,877,329</b>		<b>78,222</b>

*\*Note: Table may not sum due to rounding*



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#### ***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 or renewal. During the initial launch of the TSA Pre✓<sup>®</sup> 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✓<sup>®</sup> expedited screening via their participation in CBP’s Global Entry program. TSA will use additional biometrics, specifically a facial image and/or an iris scan, 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✓<sup>®</sup> Application Program prior to the collection of the additional facial image and/or an iris scan biometric or in other TSA Pre✓<sup>®</sup> eligible populations, such as Global Entry, without the additional biometrics requirements, may come back to provide additional biometrics. The submission burden is derived from the estimated number of initial and new enrollments multiplied by the percentage of those providing biometrics post-enrollment (50%) and the estimated time for submission (five minutes) plus travel (54 minutes), or 59 minutes. Table 7 provides the estimated total hours for applicants that provide biometrics post-enrollment.

**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 = 0.98333 hours)</b>	<b>Total Hours</b>
	A	B	C=A*B
2018	1,055,088	0.983333333	1,037,503
2019	1,274,376		1,253,136
2020	1,425,194		1,401,441
<b>Total</b>	<b>3,754,658</b>		<b>3,692,080</b>

**\*Note: Table may not sum due to rounding**

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

Since the launch of the TSA Pre✓<sup>®</sup> Application Program, TSA’s contractor has turned away from the in-person enrollment process applicants who have not brought valid or sufficient identity and citizenship or immigration documents. This occurs primarily for individuals who inquire about applying on a walk-in basis, mostly at airport enrollment locations, but do 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 in the past, TSA plans to allow individuals who did not provide or bring their citizenship or immigration data or documents to the enrollment center to provide this information pre- or post-enrollment. TSA estimates that 20 percent of applicants may elect to provide this information online while 10 percent will choose to mail or fax the information. The corresponding hour burden estimates are reflected in Tables 8 and 9.

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**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 = 0.08333 hours)</b>	<b>Total Hours</b>
	A	B	C=A*B
2018	422,035	0.083333333	35,170
2019	509,750		42,479
2020	570,078		47,506
<b>Total</b>	<b>1,501,863</b>		<b>125,155</b>

\*Note: Table may not sum due to rounding

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

<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 = 0.08333 hours)</b>	<b>Total Hours</b>
	A	B	C=A*B
2018	211,018	0.083333333	17,585
2019	254,875		21,240
2020	285,039		23,753
<b>Total</b>	<b>750,932</b>		<b>62,578</b>

\*Note: Table may not sum due to rounding

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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, in-person enrollments, customer satisfaction survey burden, and post-enrollment data submission burdens for each period.

<b>Table 10: Total Estimated Enrollment Time Burden in Hours by Year</b>								
<b>Calendar Year (CY)</b>	<b>Online Pre-Enrollments Burden in Hours</b>	<b>Initial and Renewal In-Person Enrollment (with no Pre-Enrollment) Burden in Hours</b>	<b>Online Renewals Burden in Hours</b>	<b>Customer Survey Burden in Hours</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>
	A	B	C	D	E	F	G	H=A+B+C+D+E+F+G
2018	2,331,569	533,944	528	21,981	1,037,503	35,170	17,585	3,978,280
2019	2,130,302	527,166	98,765	26,549	1,253,136	42,479	21,240	4,099,637
2020	2,166,250	552,441	141,381	29,692	1,401,441	47,506	23,753	4,362,464
<b>Total</b>	<b>6,628,121</b>	<b>1,613,551</b>	<b>240,675</b>	<b>78,222</b>	<b>3,692,080</b>	<b>125,155</b>	<b>62,578</b>	<b>12,440,381</b>

\*Note: Table may not sum due to rounding

**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✓® Application Program. If initially deemed ineligible, applicants have an opportunity to correct cases of misidentification or inaccurate criminal records.

Based on current data, approximately 0.07 percent of TSA Pre✓® 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 35 percent of individuals contact TSA in writing and request a correction of record before TSA makes a final determination.

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Individuals who request a correction of record must do a variety of activities depending on their application. At the very least, individuals must write a letter to TSA, and they also must collect information about any criminal convictions from courts or local jurisdictions regarding criminal history related disqualifying factors. 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 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. This information is presented in Table 11 below.

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

Calendar Year (CY)	Enrollments	Percent of Applicants Initially Deemed Ineligible	Percent of Applicants Initially Deemed Ineligible that request a Correction of Records	Estimated Time Burden in hours per Applicant for Correction of Records	Estimated Total # of Applicants to Request a Correction of Record	Total Correction of Records Hours
	A	B	C	D	E=A*B*C	F=D*E
2018	2,110,176	0.07%	35%	6	517	3,102
2019	2,548,752				624	3,747
2020	2,850,389				698	4,190
<b>Total</b>	<b>7,509,316</b>				<b>1,840</b>	<b>11,039</b>
<b>Annualized</b>	<b>2,503,105</b>	<b>0.07%</b>	<b>35%</b>	<b>6</b>	<b>613</b>	<b>3,680</b>

**Total Annual Burden:** TSA estimates the annual total burden for all collection pieces of this ICR is approximately 4,150,473 hours.

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

Calendar Year (CY)	Total Application Enrollment Burden in Hours	Total Correction of Records Burden in Hours	Total Time Burden in Hours
	A	B	C=A+B
2018	3,978,280	3,102	3,981,382
2019	4,099,637	3,747	4,103,384
2020	4,362,464	4,190	4,366,654
<b>Total</b>	<b>12,440,381</b>	<b>11,039</b>	<b>12,451,420</b>
<b>Annualized</b>	<b>4,146,794</b>		<b>4,150,473</b>

\*Note: Table may not sum due to rounding

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**Total Annual Number of Responses:** The projected total number of responses for all aspects of this program is **15,395,938** responses. The projected average annual number of responses is **5,131,979**.

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

Calendar Year (CY)	Pre-Enrollment Applicants (80% of Initial Enrollments)	In-Person Enrollments with no Pre-Enrollment (20% of Initial Enrollments & 5% of Renewals)	Online Enrollments (95% of Renewals)	Customer Survey Participants (25% 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 Responses
	A	B	C	D	E	F	G	H	I=A+B+C+D+E+F+G+H
2018	1,685,472	421,535	3,169	527,544	1,055,088	422,035	211,018	517	4,326,377
2019	1,539,977	416,183	592,591	637,188	1,274,376	509,750	254,875	624	5,225,566
2020	1,565,964	436,138	848,288	712,597	1,425,194	570,078	285,039	698	5,843,995
<b>Total</b>	<b>4,791,413</b>	<b>1,273,856</b>	<b>1,444,048</b>	<b>1,877,329</b>	<b>3,754,658</b>	<b>1,501,863</b>	<b>750,932</b>	<b>1,840</b>	<b>15,395,938</b>
<b>Annualized</b>	<b>1,597,138</b>	<b>424,619</b>	<b>481,349</b>	<b>625,776</b>	<b>1,251,553</b>	<b>500,621</b>	<b>250,311</b>	<b>613</b>	<b>5,131,979</b>

**\*Note: Table may not sum due to rounding**

TSA assumes applicants for the for TSA Pre✓® Application Program can be employed in various industries and occupations. Therefore, TSA uses a fully loaded compensation rate<sup>4</sup> of \$35.28, including both wages and benefits, for each respondent.

<sup>4</sup> Employer Costs for Employee Compensation (ECEC), a product of the National Compensation Survey, measures employer costs for wages, salaries, and employee benefits for nonfarm private and state and local government workers. Bureau of Labor Statistics, Employer Costs for Employee Compensation News Release, Table 1, (Total Compensation for Civilians, Private Sector, Local and State Government Employees). Data as of March 2017, Released June 2017. [https://www.bls.gov/news.release/archives/ecec\\_06092017.htm](https://www.bls.gov/news.release/archives/ecec_06092017.htm).

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TSA estimates the total cost burden for TSA Pre✓<sup>®</sup> Application Program respondents by multiplying the number of application enrollees by the compensation rate for each respondent. Multiplying the total time burden in hours, 12,451,420, by the loaded wage rate of \$35.28, TSA estimates a total hourly cost burden estimate of **\$439,286,103** for TSA Pre✓<sup>®</sup> Application Program respondents. TSA multiplies the annualized time burden in hours, 4,150,473 by hourly rate of \$35.28 to estimate an annualized hourly cost burden of **\$146,428,701**. Table 14 below displays both three-year total hourly cost burden and annualized hourly cost burden for TSA Pre✓<sup>®</sup> Application Program respondents.

**Table 14: Estimated Total Hourly Cost Burden by Year**

Calendar Year (CY)	Total TSA Pre✓ <sup>®</sup> Application Program Annual Enrollments	Total Time Burden in Hours	Compensation Wage Rate	Total Hourly Cost Burden
	A	B	C	D=B*C
2018	2,110,176	3,981,382	\$35.28	\$140,463,155
2019	2,548,752	4,103,384		\$144,767,388
2020	2,850,389	4,366,654		\$154,055,560
<b>Total</b>	<b>7,509,316</b>	<b>12,451,420</b>		<b>\$439,286,103</b>
<b>Annualized</b>	<b>2,503,105</b>	<b>4,150,473</b>		<b>\$146,428,701</b>

**\*Note: Table may not sum due to rounding**

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

Applicants who enroll or renew 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 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. Lastly, TSA estimates a charge of approximately \$15.00 for individuals who only visit an enrollment center to submit additional biometrics to cover enrollment contractor costs to collect the information.

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TSA estimates the total annual cost burden to respondents resulting from the collection of information based on the sum of the application enrollment fee costs and the correction of record fee costs. Table 15 presents the total fee costs.

**Table 15: Estimated Application Enrollment Cost Burden**

Calendar Year (CY)	Total TSA Pre✓® Application Program Annual Enrollments	Total TSA Pre✓® Application Program Annual Enrollments Fees (\$85)	Total Post-Enrollment Biometric Enrollees	Total Post-Enrollment Biometric Fees* (\$15)	Total Program Estimated Fee
	A	B=A*\$85	C = A*0.5	D=C*\$15	E = B+D
2018	2,110,176	\$179,364,919	1,055,088	\$15,826,316	\$195,191,236
2019	2,548,752	\$216,643,902	1,274,376	\$19,115,638	\$235,759,540
2020	2,850,389	\$242,283,042	1,425,194	\$21,377,915	\$263,660,957
<b>Total</b>	<b>7,509,316</b>	<b>\$638,291,862</b>	<b>3,754,658</b>	<b>\$56,319,870</b>	<b>\$694,611,733</b>
<b>Annualized</b>	<b>2,503,105</b>	<b>\$212,763,954</b>	<b>1,251,553</b>	<b>\$18,773,290</b>	<b>\$231,537,244</b>

\*Note: Table may not sum due to rounding

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 16: 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
	A	B	C=A*B
2018	517	\$1	\$517
2019	624		\$624
2020	698		\$698
<b>Total</b>	<b>1,840</b>		<b>\$1,840</b>
<b>Annualized</b>	<b>613</b>		<b>\$613</b>

\*Note: Table may not sum due to rounding

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The three-year total cost burden for the TSA Pre✓® Application Program is estimated to be **\$694,613,572** based on the sum of total application enrollment costs and total correction of record costs. The annualized total cost burden is estimated to be **\$231,537,857**.

**Table 17: 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>
	A	B	C = A+B
2018	\$195,191,236	\$517	\$195,191,753
2019	\$235,759,540	\$624	\$235,760,165
2020	\$263,660,957	\$698	\$263,661,655
<b>Total</b>	<b>\$694,611,733</b>	<b>\$1,840</b>	<b>\$694,613,572</b>
<b>Annualized</b>	<b>\$231,537,244</b>	<b>\$613</b>	<b>\$231,537,857</b>

**\*Note: Table may not sum due to rounding**

**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✓® Application Program applicants (estimates are reflected in Table 15 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✓® Application Program.

The current TSA Pre✓® Application Program charges a total fee of \$85.00 per person to recover fully the cost of this unique security service.

The fee comprises three components: the enrollment vendor fee, the TSA fee, and the FBI fee. The enrollment vendor fee component is designed to fully recover the estimated costs the vendor incurs to enroll applicants. The TSA fee is designed to cover the cost of processing applications, including any necessary redress, communicating results, monitoring participants, and providing 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 enrollment vendor and TSA fee components total \$75 and ensure 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



## **INFORMATION COLLECTION SUPPORTING STATEMENT**

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

set the fee at \$10.00. See Notice, FBI Criminal Justice Information Services Division; Revised User Fee Schedule, 81 FR 45535 (July 14, 2016).

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 participants 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.**

TSA adjusted the burden estimates based on enrollment process changes and estimated populations since the previously submitted ICR.

**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.