

SUPPORTING STATEMENT
OMB No. 1651-0121
Trusted Traveler Programs and U.S. APEC Business Travel Card

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.**

This collection of information is for CBP's Trusted Traveler Programs including the Secure Electronic Network for Travelers Rapid Inspection (SENTRI), which allows dedicated processing at specified southwest land border ports of entry; the Free and Secure Trade program (FAST), which provides dedicated processing for known, low-risk commercial drivers; and Global Entry (GE) which allows pre-approved, low-risk, air travelers dedicated processing clearance upon arrival into the United States.

The purpose of all of these programs is to provide prescreened travelers dedicated processing into the United States. The benefit to the traveler is less time spent in line waiting to be processed. These Trusted Traveler programs are provided for in 8 CFR 235.7 and 235.12.

This information collection also includes the U.S. APEC Business Travel Card (ABTC) Program, which is a voluntary program that allows U.S. citizens to use fast-track immigration lanes at airports in the 20 other Asia-Pacific Economic Cooperation (APEC) member countries. This program is mandated by the Asia-Pacific Economic Cooperation Business Travel Cards Act of 2011, Public Law 112-54 and provided for by 8 CFR 235.13.

These collections of information include the data collected on legacy kiosks (machines which are permanently installed in airports and print a paper receipt for verification of the traveler's arrival), websites, mobile phone applications, and portals (mobile processing units that CBP can position anywhere inside the Federal Inspection Area) for these programs. Applicants may apply to participate in these programs by using the Trusted Traveler Program Systems website (TTP) at <https://ttp.cbp.dhs.gov/> or at Trusted Traveler Enrollment Centers.

After arriving at the Federal Inspection Services area of the airport, participants in Global Entry can undergo a self-serve process to report their arrival and facilitate inspection process using a legacy kiosk, portal, or Global Entry (GE) Mobile application. During the self-service process at a legacy

kiosk, participants have their photograph and fingerprints taken, submit identifying information, and answer several questions about items they are bringing into the United States. When using the legacy kiosks, participants are required to declare all articles being brought into the United States pursuant to 19 CFR 148.11.

Proposed Changes:

CBP will be updating the Trusted Travel Programs to align with the U.S. Department of State's Passport Options: CBP will modify the Trusted Traveler Program application by adding a third gender marker, "X" for applicants identifying as non-binary, intersex, and/or gender non-conforming (in addition to the existing "male and "female" gender markers). The "X" marker will be categorized as "Unspecified or Another Gender Identity", in the document sections of the electronic Trusted Traveler Programs application.

In addition, coinciding with agency wide efforts to reduce burden on the public, CBP's new Global Entry (GE) portals and the Global Entry (GE) Mobile application are replacing legacy kiosks, enabling quicker, touchless processing for participants. The portal or app will take the traveler's facial image and match it with the existing image from the application process. The questions previously asked by the legacy kiosk will now be a verbal attestation when exiting the area.

- 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.**

The purpose of enrolling in SENTRI, FAST and Global Entry is to prescreen applicants and their vehicles in order to expedite travelers seeking admission to the United States. The target participant is any law-abiding frequent traveler who is legally allowed entry into the United States, e.g., students and businesspeople. The benefit to the traveler is less time waiting to be processed by CBP. The purpose of enrolling in the U.S. ABTC Program is so U.S. citizens may use fast-track immigration lanes at airports in the 20 other APEC member countries.

- 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.**

Applicants may enroll in these programs using the Trusted Traveler Program (TTP) which is a web-based system at <https://ttp.cbp.dhs.gov/>.

Global Entry Participants can use Global Entry (GE) portals, touchless Wi-Fi tablets, to conduct self-serve inspections. If TVS has a problem processing the traveler, then the traveler will need to insert their passport for an e-chip, 1:1 comparison of the passport photo, against the photo of the traveler in front of the GE portal. The travelers can also use the Global Entry (GE) Mobile application, which works exactly the same as the portals.

Usability testing was conducted on a small-scale for the portal program, and due to its success, CBP plans to expand the portal program to other airports.

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.**

The information collected for SENTRI, FAST, Global Entry and ABTC business card is unique and not duplicated elsewhere.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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

6. **Describe consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If not collected, the DHS would be unable to meet its statutory mandate and would not be able to determine eligibility for participation in the SENTRI, FAST, Global Entry and ABTC programs.

7. **Explain any special circumstances.**

This information collection is conducted in a manner consistent with the guidelines of 5 CFR 1320.6.

8. **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 these comments. Specifically address comments received on cost and hour burden.**

Public comments were solicited through two Federal Register notices including a 60-day notice published on June 1, 2022 (Volume 87, Page 33178) on which four

comments were received, and a 30-day notice published on September 27, 2023 (Volume 88, Page 66465) on which no comments have been received.

Comments received during the 60-day notice include:

One comment submitted by scholars affiliated with the Williams Institute at the UCLA School of Law; expressing support for the X-gender marker changes, in which CBP is grateful for the comment and support received.

Two more public comments submitted by Arli Christian and Harper Jean Tobin, both requested to review all documents when finalized and available.

The final public comment received was submitted by The American Civil Liberties Union (ACLU), Transgender Legal Defense & Education Fund, interACT: Advocates for Intersex Youth, National Center for Transgender Equality, and Transgender Law Center submitted one comment combined; The comment was in support of the X-gender marker changes, encouraging use of self-attestation of gender, emphasizing to CBP the importance that access to “X,” “M,” or “F” designations not be conditioned on any aspects of an individual’s personal medical history or medical documentation, and additionally a suggested language edit to accompany the X-gender marker changes being made, please see official CBP response to that suggestion below:

1. Recommendation for CBP to alter language to emphasize the ‘self-designation’ aspect. Example language was provided, modeled from the State Department’s.
 - **CBP Response:** CBP continues to work closely with The Department of State to ensure as smooth a travel experience as possible for all passport holders, regardless of their gender identity. CBP has updated The TTP application and membership system based on guidance received from the Department of State, which concluded that the definition of the X gender marker will be “Unspecified or another gender identity”. This definition is respectful of individual’s privacy while advancing inclusion. Thank you for your comment.

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

There is no offer of a monetary or material value for this information collection.

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

An updated PIA for the Global Enrollment System (GES) including Facial Recognition dated December 13, 2019, and a SORN for the GES dated January

16, 2013 (Volume 78, Page 3441) will be included in this ICR. There are no assurances of confidentiality are provided to the respondents of this information collection.

- 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 persons 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.**

| FORM NUMBER/ TITLE | TOTAL ANNUAL BURDEN HOURS | NO. OF RESPONDENTS | NO. OF RESPONSES PER RESPONDENT | TOTAL RESPONSES | TIME PER RESPONSE |
|----------------------------|---------------------------------|-----------------------|--|--------------------|------------------------------------|
| SENTRI | 185,308 | 276,579 | 1 | 276,579 | 40 minutes (0.67 hours) |
| FAST | 13,939 | 20,805 | 1 | 20,805 | 40 minutes (0.67 hours) |
| Global Entry Enrollment | 933,217 | 1,392,862 | 1 | 1,392,862 | 40 minutes (0.67 hours) |
| ABTC | 1,676 | 9,858 | 1 | 9,858 | 10 minutes (0.17 hours) |
| Global Entry Admission | 14,271 | 10,275,367 | 1 | 10,275,367 | 5 seconds (0.00138889 hours) |
| TOTAL | 1,148,411 | 11,975,471 | | 11,975,471 | |

Public Cost

The estimated cost to the respondents is \$54,090,158. This is based on the estimated burden hours (1,148,411) multiplied by the average hourly wage rate for all-purpose air travelers (\$47.10). CBP used the U.S. Department of Transportation’s (DOT) recommended hourly value of travel time savings for intercity, all-purpose travel by air and high-speed rail, which is provided in 2015 U.S. dollars. CBP assumes an annual growth rate of 0 percent; the 2015 U.S.

dollar value is equal to the 2022 U.S. dollar value.¹

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

There are no record keeping, capital, start-up or maintenance costs associated with this information collection. However, there is a fee of \$122.25 for SENTRI, a \$50 fee for FAST; a \$100 enrollment fee for Global Entry; and a \$70 fee for ABTC.

| | |
|--------------------------|---|
| SENTRI Fee: | 276,579 respondents x \$122.25 = \$33,811,783 |
| FAST Fee: | 20,805 respondents x \$50 = \$1,040,250 |
| Global Entry Fee: | 1,392,862 respondents x \$100 = \$139,296,200 |
| US ABTC Fee: | 9,858 respondents x \$70 = \$690,060 |
| <hr/> | |
| | Total \$174,838,293 |

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.

Annualized Cost Analysis:

| | | | |
|----|--------------------------------|----|--------------------|
| a. | Collection and Processing Cost | \$ | 174,838,293 |
| b. | Total Cost to Government | \$ | 174,838,293 |

The collection and processing cost to the Federal Government is calculated by multiplying the total number of respondents filing times the fee required, equaling \$174,838,293.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13.

In efforts to reduce burden, CBP is transitioning from legacy kiosks to GE portals and the Global Entry (GE) Mobile application; the time savings from the new processing can be measured in three ways:

¹ Source: U.S. Department of Transportation, Office of Transportation Policy. *The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2016 Update)*, "Table 4 (Revision 2 - 2016 Update): Recommended Hourly Values of Travel Time Savings for Intercity, All-Purpose Travel by Air and High-Speed Rail." September 27, 2016. Available at <https://www.transportation.gov/sites/dot.gov/files/docs/2016%20Revised%20Value%20of%20Travel%20Time%20Guidance.pdf>. Accessed May 25, 2022.

1. GE portals' touchless processing. Participants will only need to look at the screen to be processed at a GE portal. If TVS has a problem identifying the traveler, the traveler can insert their passport into the device so we can pull the e-chip for a 1:1 comparison of the passport photo, against the photo of the traveler in front of the portal. The Global Entry (GE) Mobile application works similarly except that problems are addressed by referring the traveler to a specific lane through a message screen on the application to be processed by an officer.
2. Visual presentation on the tablet allows the officer to quickly process the traveler without reviewing a paper receipt. This is a time savings for the officer and participant, as it cuts down the interaction time and delays caused from using paper receipts.
3. Officers at the Ports when standing by the GE portals can process travelers from the tablet running on Wi-Fi. This allows the officer to direct and move travelers to pick up their luggage without requiring them to stand in line to see an officer at a booth.

The new portal technology and mobile app advantage over the legacy kiosks is the touchless processing. Travelers now only need to look at the screen to be processed within 5 seconds, as opposed to 1 minute at a legacy kiosk; reducing the burden reported for GE portals from 50,583 hours, down to 14,271 hours, a decrease of 36,312 hours. Despite an increase in the number of respondents using GE portals and the mobile app, CBP has lowered the total reported burden for this information collection from 1,184,723 down to 1,148,411.

Additionally, CBP will be updating the Trusted Travel Programs to align with the U.S. Department of State's Passport Options: CBP will modify the Trusted Traveler Program application by adding a third gender marker, "X" for applicants identifying as non-binary, intersex, and/or gender non-conforming (in addition to the existing "male and "female" gender markers). The "X" marker will be categorized as "Unspecified or Another Gender Identity", in the document sections of the electronic Trusted Traveler Programs application. The X-gender addition does not change the estimated burden reported.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate.

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

18. Certification for Paperwork Reduction Act Submissions.

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

B. Collection of Information Employing Statistical Methods

No statistical methods are used.