Supporting Statement A

**International Traveler Information Card (ITIC)**

**OMB 2120-XXXX**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The International Traveler Information Card (ITIC) is an online form that must be completed by Federal Aviation Administration (FAA) employees and contractors prior to international travel for official business. The purpose of the ITIC is to collect pertinent security data to be used in the event an FAA employee and/or contractor is isolated overseas and requires lifesaving assistance. This security data will assist in the U.S. government’s ability to properly identify FAA employees and/or contractors and provide, if necessary, medical support and personal items should they become isolated overseas.

The authority for this collection resides in Presidential Policy Directive (PPD)/PPD-30 and 22 United States Code (U.S.C.) 4802 subsection (a)(1)(A) and 22 U.S.C. 3927 subsection (b).

*Presidential Policy Directive/PPD-30*

*This Presidential Policy Directive (PPD), including its classified annex, supersedes and revokes NSPD-12, United States Citizens Taken Hostage Abroad, dated February 18, 2002, along with Annex 1 and Appendix A to NSPD-12, dated December 4, 2008. The policy directs a renewed, more agile United States Government response to hostage-takings of U.S. nationals and other specified individuals abroad. It establishes processes to enable consistent implementation of the policies set forth in this directive, to ensure close interagency coordination in order to employ all appropriate means to recover U.S. hostages held abroad, and to significantly enhance engagement with hostages' families. It also reaffirms the United States Government's personnel recovery policy, which seeks to prevent, prepare for, and respond to hostage-takings and other circumstances in which U.S. nationals are isolated from friendly support.*

*§4802. Responsibility of Secretary of State*

1. *Security functions*
   1. *The Secretary of State shall develop and implement (in consultation with the heads of other Federal agencies having personnel or missions abroad where appropriate and within the scope of the resources made available) policies and programs, including funding levels and standards, to provide for the security of United States Government operations of a diplomatic nature and foreign government operations of a diplomatic nature in the United States. Such policies and programs shall include-*
      1. *Protection of all United States Government personnel on official duty abroad (other than Voice of America correspondents on official assignment and those personnel under the command of a United States area military commander) and their accompanying dependents;*

*§3927. Chief of mission*

1. Duties of agencies with employees in foreign countries

*Any executive branch agency having employees in a foreign country shall keep the chief of mission to that country fully and currently informed with respect to all activities and operations of its employees in that country, and shall insure that all of its employees in that country (except for Voice of America correspondents on official assignment and employees under the command of a United States area military commander) comply fully with all applicable directives of the chief of mission.*

Federal agencies with employees in foreign countries must ensure that those employees and contractors fully comply with all applicable directives of the U.S. Department of State’s (DOS) Secretary of State and Chief of Mission. In order to protect U.S. Government personnel on official duty abroad, an agency must collect Personally Identifiable Information (PII) on their employees and contractors to aid in their authentication and recovery. The FAA’s ITIC collects that information, which is derived from the DOS Missing Persons Identification Card (MPIC).

**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 this collection is to have PII available on FAA employees and contractors who travel internationally on official business that can help authenticate their identity should an isolating event occur. Authentication allows security partners to provide necessary aid and resources to those FAA employees and contractors should they become isolated overseas and require recovery and/or emergency medical services by the U.S. Government.

The ITICs will only be used when an isolating event occurs overseas. An isolating event is defined as an incident in which a person(s) becomes separated from friendly support due to the environmental, mechanical, adversarial, or human error factors, is unable to continue their work, and requires assistance. No personal information will be disseminated to FAA employees and contractors without a need to know, nor will the information be shared with the general public. Only certain individuals with roles in Personnel Recovery can have access to the collection (i.e., designated International Travel Security Program Manager, Senior Watch Officer of the FAA’s Washington Operations Center) and share the ITIC per guidance from the DOS’ Chief of Mission. Security protocols have been put in place so that an individual’s information can only be shared via email with the ITIC in an encrypted and password-protected attachment. determines purpose of retrieving an ITIC is to aid in an isolating event, as determined by the Chief of Mission, and to forward it to the appropriate Regional Security Officer (RSO). ITICs will be retained according to records management policy until no longer needed for business use, and or updated as needed.

Responding to the collection request will be mandatory for all FAA employees and contractors who will travel overseas for official business. However, completion of the medical portion is voluntary. The collection is for recordkeeping and disclosure purposes, and disclosure will only occur for the specific employee or contractor that is involved in an isolating incident. Collection frequency will be bi-annually or as needed. The form collects the following information: First Name, Middle Name, Last Name, Date of Birth (DOB), Gender, Routing Symbol, Professional Email, Personal Email, Cell Phone Number, International Mobile Equipment Identity (IMEI) Number, Height, Weight, Hair Color, Eye Color, Shirt Size, Pant Size, Shoe Size, Ethnic Group, Blood Type, Scars/Marks/Tattoos, Duress Word, Two Personal Authenticator Statements, Known Medical Conditions, Current Medical Prescriptions, Allergies, and Specialized Training, Language Capabilities, Next of Kin First Name, Next of Kin Last Name, Next of Kin Middle Initial, Next of Kin Relationship, Next of Kin Personal Email, Next of Kin Telephone Number, and Next of Kin Address.

The purpose of retrieving the ITIC during an isolating event, as determined by the Chief of Mission, and the information will be forwarded to the appropriate RSO. The Chief of Mission, relying on situational factors, will make the ultimate decision on who, if needed, this information is shared within the event of a personnel recovery event such as but not limited to, the Department of Defense.

This is not a revision.

**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.**

Electronic submission of responses is the only way to submit the information.

There are no plans to make it available for public printing. It is only required of FAA employees and FAA contractors that are traveling overseas for official business. The information collected will not be made available to the public over the internet due to the sensitive nature of the information being collected.

**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.**

Some of this information is currently collected for security clearances on FAA employees and contractors; however, the PRA requires that collections on contractors, which are considered “the public”, must have an OMB Control Number and cannot be compelled to complete the collection. The Department of Defense collects the information for security clearances; however, that is not available for our use.

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

Not applicable

**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 the burden.**

If the collection is not conducted, then life-saving information may not be available to the Chief of Mission should an isolating event occur. While some information may be able to be gathered, it would require additional time to locate and obtain the requisite authorizations to release. Additionally, some of the information being collected does not exist outside this form, which would make the authentication needlessly difficult in a situation that would require expedience.

Collections will only be on an as-needed basis and only for employees and contractors that meet the narrow definition of traveling overseas on official business.

**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;*** Not Applicable
* ***requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*** Not Applicable
* ***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;*** Not Applicable
* ***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;*** Not Applicable
* ***requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*** Not Applicable
* ***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 secrets, 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.*** Not Applicable

There will be no inconsistencies in this collection.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.**

A Federal Register Notice published on May 1, 2024 followed by, in parentheses, the Federal Register citation, e.g. 73 FR 12345, solicited public comment. No comments were received.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Not Applicable

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

Confidentiality will not be guaranteed. The collection will be housed on a SharePoint page located behind the FAA firewall. Site access requires FAA user credentials which are verified using the same (PIV) authentication process that is used for all FAA users. It cannot be accessed by the general public. This information is saved on an encrypted Cloud database and is kept until no longer needed (such as an instance where an employer or contractor no longer works for the FAA). The information can only be retrieved by one of two International Travel Security Program Managers and the RSO via a password-protected and encrypted email or by the FAA team (currently three contractors) that operate the Cloud database.

**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.**

Questions regarding medical conditions are to ensure proper medical care is administered at the time of recovery or in the case of an isolating event while on official international travel.

Identifying markings/scars/tattoos are for authentication purposes.

Requests for clothing sizes are to provide personal items, as needed, and depending on the recovery situation.

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

1,314 FAA travelers (this is the total of FAA employees and contractors) that undertook official international business in Fiscal Year 2024. Once collection begins, completion of this form will be on an as-needed basis. The form will remain on file, saved to Cloud storage, to be amended. Typically, traveler information will need to be amended if the traveler’s information changes (i.e. updates/changes to medication, additional tattoos, hair color changes, clothing size changes, etc.) The total burden time for the traveler should not exceed 30 minutes, annualized record-keeping would be 1.6 hours per respondent.

The estimated cost burden to respondents (contractors traveling on official business) resulting from the collection of information is as follows:

**The estimated cost burden for FY25:** 35 [estimated # of contractors that will travel on official business in FY24] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by .5 [half an hour is the estimated minutes to complete the ITIC)] = **$980.60**

35 [estimated # of records for contractors that will travel on official business in FY24] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by 1.6 [number of estimated hours for record-keeping to maintain the ITIC)] = **$3114.26**

**The estimated cost burden for FY24:** 52 [estimated # of contractors that will travel on official business in FY24] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by .5 [half an hour is the estimated minutes to complete the ITIC)] = **$1,445.86**

52 [estimated # of records for contractors that will travel on official business in FY24] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by 1.6 [number of estimated hours for record-keeping to maintain the ITIC)] = **$4626.91**

**The cost burden in FY23:** 38 [contractors traveled on official business in FY23] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by .5 [half an hour is the estimated minutes to complete the ITIC)] = **$1,056.59**

38 [estimated # of records for contractors that will travel on official business in FY24] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by 1.6 [number of estimated hours for record-keeping to maintain the ITIC)] = **$3381.20**

|  |  |  |  |
| --- | --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** | **Disclosure** |
| **# of Respondents** | 35 | 35 | 0 |
| **# of Responses per respondent** | 1 | 1 | 0 |
| **Time per Response** | .5 hr | 1.6 hrs per record | 0 min |
| **Total # of responses** | 35 | 35 | 0 |
| **Total burden (hours)** | 17.5 hrs/yr | 56 hrs/yr | 0 |

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

There is no additional cost beyond what has been shown in Question 12.

**14. Provide estimates of annualized costs 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.**

The annualized costs to the Federal government will be as follows:

The initial cost burden for the creation of the online form (ITIC) and site creation is as follows: Private Industry wages (contractors) at $43.11 (per hour) + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by 300 hrs = **$16,683.00**

Annual maintenance would be $43.11 per hour + the multiplier of .29 multiplied by 80 hours= **$4,448.80**

The cost of supporting recording keeping on the Cloud is absorbed by the current contract covering the SharePoint.

The estimated cost of the International Travel Security Program Manager contacting contractors to complete/update the ITIC annually is: Civilian workers' wages at $45.42 per hour + the multiplier of .31 [31% multiplier from the BLS for government employees to reflect total compensation] multiplied by 5 minutes per contact [converted to hours is .0833] x 35 contractors [the # of contacts] = **$173.47**

The estimated cost to complete the ITIC in future FYs: 15 contractors [# of contractors that need to update their ITIC or new contractors that will not have completed the ITIC prior to travel on official business after initial approval of collection] multiplied by $43.11 per hour + the multiplier of .29 [29% multiplier from the Bureau of Labor Statistics (BLS) for private sector/contractors to reflect total compensation] multiplied by .5 [half an hour is the estimated minutes to complete the ITIC)] = **$417.08**

Total annual cost: **$21,722.35**

**15. Explain the reasons for any program changes or adjustments.**

This is a new collection.

**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.**

Not Applicable

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

Not Applicable

**18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

Not Applicable