



June 28, 2021

CDC Desk Officer  
Office of Management and Budget  
725 17<sup>th</sup> Street NW  
Washington, DC 20503

**Re: Comments of Airlines for America Regarding CDC Forms Undergoing Paperwork Reduction Act Review: Requirement for Negative Pre-Departure Covid-19 Test Result or Documentation of Recovery From Covid-19 for all Airline or other Aircraft Passengers Arriving into the United States from any Foreign Country (OMB Control No. 0920-1318)**

Airlines for America (“A4A”), on behalf of its Members,<sup>1</sup> applauds the Centers for Disease Control and Prevention (“CDC”) for its leadership in the U.S. response to the COVID-19 pandemic. CDC’s and the industry’s multi-layered travel-related measures have provided strong protections against transmission of the virus in air travel. With the Administration’s substantial progress towards beating the virus, including the widespread availability of COVID-19 vaccines, we continue to support a collaborative government/industry effort to develop a risk-based, data-driven roadmap to rescind inbound international travel restrictions, including those issued under section 212(f) of the Immigration and National Act (INA). We respectfully submit that the subject of the information collection must be considered in development of a roadmap and the Administration should reconsider or appropriately narrow the collection to reduce the substantial burden on international travelers and industry in accordance with the Paperwork Reduction Act (“PRA”).

First, we urge the Administration to examine the necessity and burden of the attestation and, at a minimum, the requirement that airlines collect and retain the attestation. Because airlines must check passenger documentation of negative test results or recovery from COVID-19, we respectfully submit that the collection and review of an attestation that the passenger has received that negative test result or has recovered from COVID-19 is duplicative. Although the requirement for a Federal government form and individual attestation may provide a “hook” by which the CDC may enforce against the passenger individually, we are unaware of any efforts by CDC to identify fraud or use the attestation for purposes of investigating passengers that have

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<sup>1</sup> See A4A’s members are: Alaska Air Group, Inc.; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

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traveled without a negative test result or documentation of recovery from COVID-19, let alone issue a referral for enforcement by the CDC or the Department of Justice. Further, there are far-less burdensome means to inform the public of the federal testing requirements, such as signage or notice that is given to passengers, but not required to be collected.

Last, the duplicative burden on airlines is substantial. One A4A member carrier estimated that the burden of the obligations through mid-May include:

- Increased passenger processing times by 267%;
- Processing of 1.6 million paper forms; and
- Approximately 164,000 hours of form processing (sorting, scanning, destroying) that has resulted in 3.5 tons of paper destroyed.

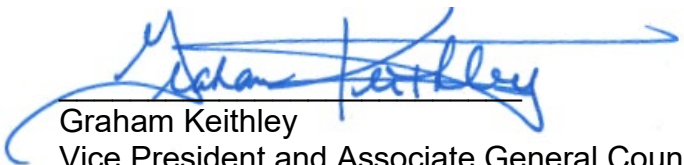
Surely, there are less burdensome means of informing passengers of their obligation to truthfully comply with federal testing requirements.

Although some airlines have been able to digitize the attestation requirement for many passengers, such a solution does not fully relieve the paper burden, such as for passengers that are connecting to a U.S.-bound flight after checking in with another airline. In sum, we appreciate that the attestation impresses the importance of negative test results or having documentation of COVID-19 recovery but believe that the benefit is outweighed by the costs on airlines and passengers.

Second, CDC should update its international testing mandate to exempt vaccinated individuals, particularly those traveling from lower risk countries of origin. A growing body of scientific research indicates that vaccinated individuals are unlikely to contract and spread COVID-19. For purposes of this PRA review, the Administration should reevaluate whether the burden of airlines confirming negative test results or documentation of recovery from COVID-19 by persons that are vaccinated is necessary. Moreover, such an exemption would significantly reduce the information collection burden imposed upon the vaccinated passengers, who currently still have to get tested or request COVID-19 recovery documentation, as well as the airlines that must use resources to check such information.

We thank the Administration for its consideration. Please direct all questions to Graham Keithley at [gkeithley@airlines.org](mailto:gkeithley@airlines.org).

Respectfully submitted,



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AIRLINES FOR AMERICA