Pre-Approved Cross-Border Travel in the Cascade Gateway

Report 3: PACE and CANPASS Program Improvements Report



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1. Introduction

1.1 The PACE and CANPASS Programs

The PACE (Peace Arch Crossing Entry) program for expedited border clearance of frequent cross-border travelers was started by the U.S. Immigration and Naturalization Service (INS) in 1993, along with Canada Customs & Revenue Agency's (CCRA) CANPASS program. These programs provide a dedicated commuter lane (DCL) for regular cross-border travelers to use, provided that they pass a pre-approval background check, carry their approval letters with them, and display decals on their vehicle.

These two DCL programs have proven highly successful in both providing faster service to regular border commuters, as well as providing inspection agencies an effective mechanism for focusing efforts away from low-risk traffic. CANPASS is now a national program, spanning across Canada at many land ports of entry. PACE was originally developed as a regional pilot project and is one of several DCL programs administered by the U.S. INS. The Land Border Inspection Fee Account program (8 U.S.C. Sec. 1356(q)) which enables INS to charge and collect fees for a program like PACE, was established by Congress in 1992 as a temporary program. In 1999, Congress removed the sunset clause, thus further endorsing the continued operation of PACE.

This report is a follow-on to the Whatcom Council of Governments' (WCOG) *PACE and CANPASS Market Research Report* finalized in June 2000, and presents recommendations to improve administration and operations of PACE and CANPASS with the goal of increasing program participation.

1.2 Goals of Identifying PACE Program Improvements

In a region where cross-border traffic congestion is chronic a high level of mobility and binational regulatory harmony is crucial. Both PACE and CANPASS provide assistance in alleviating at-border congestion as well as allowing federal inspection agencies to focus more on higher-risk travelers and vehicles and less on drivers with low-risk profiles. PACE and CANPASS are an important part of a comprehensive set of border-mobility improvements in this region. PACE is also an integral part of the INS' Border Vision strategy which aims to vastly increase the percentage of travelers who are pre-approved to cross the border.

By identifying obstacles which may discourage potential users from participating in PACE and CANPASS, these obstacles can be reduced and thus increase use of dedicated commuter lanes. Several obstacles were identified through interviews with potential PACE and CANPASS users and through WCOG's analysis of the program's design and functionality.

1.3 Contract Summary

This work is being performed by WCOG under a contract with the U.S. Department of Transportation Coordinated Border Infrastructure Program. This report concludes the third in a series of tasks that includes:

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- Report 1: Market Research
- Report 2: Marketing Plan
- Report 3: Program Improvements Report
- Report 4: Barriers to Joint Administration
- Report 5: Recommendations for a Jointly Administered Program

This report addresses the following project criterion: "Identify other improvements to PACE and CANPASS capable of shortening at-border processing time and freeing up resources for non-PACE and non-CANPASS processing and other functions."

2. Recommendations

2.1 Background

Conclusions in this report are based on direct interviews and observations of PACE and CANPASS program administration and operations and comparison with other DCL programs along the U.S. – Canada border.

WCOG interviewed 334 drivers crossing southbound through the Peace Arch Border Crossing on Friday, March 10, Friday, March 24, and Saturday, March 25, 2000. Of these 334 interviews, 107 respondents were determined to be potential PACE or CANPASS users based on the following criteria: they were U.S. or Canadian citizens driving vehicles that they owned or leased (eligibility criteria) and their frequency of travel was six times or more per year. In addition, all travelers in the vehicle had to be members of the same family household as is required by both PACE and CANPASS programs (see Section 5 of WCOG's PACE and CANPASS Market Research Report).

All survey participants were asked to give reasons why they had not enrolled in PACE or CANPASS. The summarized responses of the "potential PACE/CANPASS users" only are as follows:

- Unfamiliar with PACE and CANPASS: 21 percent
- Infrequently cross the border: 16 percent
- Programs are too expensive: 10 percent
- Programs are too difficult to join: 8 percent
- Intend to apply soon: 8 percent
- Travel with others (non-family members) frequently: 6 percent
- Application is under review: 5 percent
- Other vehicle has PACE/CANPASS decals: 4 percent
- Did not know they could be eligible: 3 percent

- Usually cross the border at another non-PACE/CANPASS station: 3 percent
- Didn't renew membership: 3 percent

The stated reasons for not joining the PACE and CANPASS programs helped to shape WCOG's marketing strategy as well as identify program improvements needed to increase the number of applicants.

To address the survey feedback regarding reasons for not applying, several steps could be taken under the PACE and CANPASS programs to inform the public of the benefits of PACE and CANPASS and inform them of who is eligible.

WCOG has undertaken several marketing strategies to specifically address the reasons stated for not joining the programs. WCOG's efforts include:

- Applications on-line: WCOG's interviews revealed that 60 percent of potential PACE and CANPASS users have Internet access and use the World Wide Web on a daily basis. WCOG has secured a domain name (getPACE.com) and set up a web site that provides application forms and basic program information for interested travelers. With the development of getPACE.com, WCOG has provided travelers with an opportunity to receive both PACE and CANPASS applications at one location. In addition, it is hoped that this website will later develop, with the participation of INS and CCRA, into an interactive site which could provide an on-line application process and a resource for program information and regulations.
- Distribution of program information: WCOG's marketing efforts include the distribution of PACE and CANPASS applications, rules, and program descriptions to a wider variety of locations throughout lower British Columbia and Whatcom County, Washington, in order to provide more clarification of the project costs and goals. In addition, applications will be available at numerous locations for those who do not have access to the internet.
- At-border signage: WCOG, working with the B.C. Ministry of Transportation and Highways, has had PACE signage improved and updated with displays of the new getPACE.com web site. Prior to this, not only was there no displayed information on how to apply, but there was no indication that the programs were for general, public use. Surveys confirmed a widespread sense that PACE and CANPASS were highly restricted programs.
- Program advertising: Advertisements encouraging frequent cross-border travelers to apply for PACE and CANPASS will be printed in local newspapers as well as advertised on the radio.

The following recommendations are for inspection agencies responsible for each program in the hopes that these changes will facilitate greater enrollment in each respective program.

2.2 Outreach

Of the stated reasons for not enrolling in PACE and CANPASS, four point to a need for more outreach and education regarding DCL programs, their value, and who is eligible. Accessible program information would assist 50 percent of potential users in better evaluating program benefits.

2.2.1 PACE and CANPASS Information

Recommendation 1:

Make program information readily available.

Suggestions for implementation:

- (a) Distribute applications and informative brochures at the inspection booths.
- (b) Erect brochure/application stands outside of the port-of-entry offices for accessibility when program offices are closed.
- (c) Display information regarding program availability on signage at the crossing.
- (d) Continue advertising the program through various, regional media.
- (e) Maintain resources that interested travelers can easily use to complete the application process; i.e. website, phone information, etc.

Rationale:

Unless a person takes the initiative to contact the inspection agencies and inquire as to what the PACE or CANPASS programs are, there is no way for them to find out why a special lane exists at the Peace Arch Border Crossing. Until WCOG established the getPACE.com website, information regarding the PACE program was available only through the PACE office at the Peace Arch facility. Making this primary program information source even more anonymous, the PACE office is closed on Sundays, a peak travel time for potential PACE and CANPASS customers.

WCOG has begun the process of distributing information at major destination locations including regional shopping and recreational centers. In addition, the programs will be advertised in local newspapers (The Bellingham Herald and the Vancouver Sun/B.C. Province) and on local radio stations. U.S. INS and CCRA need to continue to promote the programs by providing more ways for people to learn about PACE and CANPASS and the benefits of participation.

Recommendation 2:

Include program fees in promotional content.

Suggestions for implementation:

- (a) Advertise the price of PACE (and that CANPASS is free) along the approach to the border.
- (b) Include price information in all of the publications and media pieces discussed above.

Rationale:

Many potential users were unaware of the current fee structure (CANPASS is free and PACE is currently \$25 a year for the whole family). If potential program users knew the cost-effectiveness of the programs, they may be more willing to apply.

Recommendation 3:

Promote eligibility of all U.S. and Canadian citizens to apply.

Suggestions for implementation:

(a) Signage at the border should seek to characterize the PACE and CANPASS programs and provide contact information (phone number and/or web site) for more specifics.

Rationale:

Many of the potential users interviewed did not know that anyone can apply to PACE, believing instead that some special status was needed (cross-border worker, diplomat, etc.). They did not know that PACE and CANPASS are currently separate programs which need to be addressed separately. Many did not know where to go for more information or how the process is initiated.

2.2.2 The Value of PACE and CANPASS

Recommendation 4:

Provide estimates of time-savings from PACE and CANPASS.

Suggestions for implementation:

(a) Information distributed about PACE and CANPASS should include estimates of travel-time savings based on identification of typical peak and off-peak travel times at the border.

Rationale:

If the U.S. continues to charge a fee for PACE the potential *value* of PACE enrollment should be clearly communicated in program literature. WCOG surveys found that 16 percent of those who reported crossing the border six or more times per year still felt that they were not crossing frequently enough to justify paying \$25.

WCOG identified six trips as the average annual break-even point for PACE using U.S. Department of Transportation's 1997 memorandum on the Value of Travel Time. Based on U.S. Census income averages, the value of personal time during intercity surface travel is \$11.90 per hour. Based on this figure, a person who waits an average of twenty minutes in each direction six times a year is expensing \$47.60 of their time a year on border waits.

While the travel patterns of individuals will encounter varying degrees of congestion and wait times, outlines of a few travel pattern and frequency scenarios could enable potential customers to more thoroughly evaluate the potential timesavings benefits the program can offer them.

2.3 Enrollment

WCOG surveys revealed that many potential PACE and CANPASS users who have some understanding of the application process feel it is cumbersome, diffuse, and overly time-consuming.

Recommendation 5:

Adopt a common application form for both PACE and CANPASS.

Suggestions for implementation:

(a) Create one application form which can be used by both PACE and CANPASS programs.

Rationale:

The PACE and CANPASS applications are so similar already that the adoption of a single form – even one that allows program-specific fields – should be a relatively easy step to take towards more comprehensive goals of program harmonization. Because most program participants use both PACE and CANPASS programs, this would be an easy step that would cut the application process in half for most applicants.

Recommendation 6:

Develop on-line application forms.

Suggestions for implementation:

- (b) Provide an on-line form which would send application information directly to both CCRA and INS in either an e-mail or database entry format.
- (c) Provide an e-mail address for individuals to write to regarding their application.

Rationale:

The WCOG survey of potential PACE and CANPASS users revealed that, of the potential users interviewed, over 60 percent use the internet every day. Having the PACE and CANPASS applications on-line would assist potential users by allowing them to find out program information and regulations and fill out their application from home or work. Applicants would need to visit the PACE and CANPASS offices only once, when they present their identification and learn about the rules of the programs, and receive their letters and decals.

WCOG has created a website specifically for PACE and CANPASS applications, which are available in .pdf format and can be downloaded, printed, and mailed in. A fully developed on-line form would send information directly to INS and CCRA and obviate current needs for manual data entry.

An on-line application system would also greatly increase the efficiency of the PACE and CANPASS office staff by cutting down on paperwork and mailings, incorporating the application process directly into their databases of participants.

Recommendation 7:

Decrease the application processing times.

Suggestions for implementation:

- (a) More staff in the PACE office would alleviate the lengthy processing times and allow for better customer service and individual contact with applicants.
- (b) Wider use of e-mail could expedite communication with applicants regarding details of their application.

Rationale:

Responses to the survey such as "intend to apply soon," "too difficult to join," and "didn't renew membership" all point to opportunities for PACE and CANPASS to improve program accessibility. The huge system benefits to be gained by shifting these travelers into dedicated commuter lanes are being compromised by foregoing process improvements which cost less than the value of the benefits of improved safety and system capacity.

Recommendation 8:

Improve process for updating and renewing participant information.

Suggestions for implementation:

(a) Create a more time-effective system for updating participant information and for providing new decals.

Rationale:

Program enrollees need to go into the PACE and CANPASS offices for any of the following situations: if they purchase a new car; if the windshield of their car is broken or replaced; if their car is stolen; if they want to add a family member to their letter of approval; and if they move. Each step above can be done through communications *to* the office rather than *in* the office.

Recommendation 9:

Initiate a mail-in renewal process, and make the renewals at greater intervals.

Suggestions for implementation:

- (a) Remove requirement to renew in person.
- (b) Remove requirement to annually update decals.

Rationale:

The CANPASS program sends out renewal forms to all enrollees, which enrollees can then fax or mail back to maintain their participation in the program. The date portion of decals are mailed directly to their houses, eliminating the need for participants to go to the CANPASS office again. A similar process with PACE would be easy to maintain. Another way to streamline the application renewal process would be to require renewals every two years instead of every one. Annual charges could be collected via a credit card or annual billing system, which would maintain yearly funding without requiring participants to return to the office. In addition, this improvement greatly reduces the workload on PACE and CANPASS program staff, of which a great amount of time and effort is expended on the renewal process.

Recommendation 10:

Make information about both programs available at U.S. and Canadian offices.

Suggestions for implementation:

- (a) Put PACE application information in the CANPASS Processing Centre, and CANPASS applications in the PACE office.
- (b) Distribute a common application packet with both program applications and information included.

Rationale:

Short of developing a common application for both programs, this is an intermediate step. Currently, a person may apply for PACE without knowing what CANPASS is or where to pick up an application. By providing PACE applications in the CANPASS office, and vice versa, potential users will be able to access both applications at one stop.

2.4 Usability

Certain alterations to the current program designs could assist in allowing participants more flexibility while still assuring both INS and CCRA of the same level of security and participant-identification. These usability issues are outlined below.

Recommendation 11:

Provide multiple PACE and CANPASS decals for all family vehicles.

Suggestions for implementation:

(a) Provide multiple decals for enrolled families with more than one vehicle.

Rationale:

Several "non-PACE or CANPASS drivers" interviewed (4 percent) revealed that they had PACE and CANPASS decals on another car at home. These were preapproved travelers simply driving the "other" car. Providing one decal for each car in the family is a viable option which would allow all approved family members to cross in their respective vehicles, and reduce the number of PACE and CANPASS participants who, while pre-approved by a federal inspection agency, travel through the primary lanes when they are driving a second family car.

Recommendation 12:

Allow individuals to enroll independent of vehicles.

Suggestions for implementation:

- (a) Amend application process to accommodate 'non-vehicle' enrollments.
- (b) Remove limitation on application form specifying that applicants must be of the same family household.

Rationale:

Survey responses show that 6 percent don't use PACE and CANPASS because they "travel with others (outside the family household) frequently." Enabling individuals to enroll in PACE and CANPASS, independent of owned vehicles, would increase the number of potential pre-approved cross-border trips without diminishing the security advantages PACE and CANPASS provide.

2.5 Program Administration

Administrative changes to PACE and CANPASS provide the most potential benefits for the agencies overseeing the programs as well as for the participants in each program.

Recommendation 13:

Open the PACE and CANPASS offices on weekends and holidays.

Suggestions for implementation:

- (a) Extend office hours to open the administrative offices on Sundays and holidays.
- (b) Alternatively: incorporate PACE transactions into the standard operations and available services during all hours that the port of entry is open.

Rationale:

Lines at the border are more prevalent during weekends and holidays, when there is an increase in shopping and recreation-oriented travelers. It is congestion during the peak travel periods that PACE and CANPASS can affect most. This is when most people consider joining each program, and also when most people have time to take care of the administrative duties of each program. For those participants who live even moderate distances from the border, the only time they can conveniently come to the border to take care of PACE and CANPASS registration issues is on the weekend in combination with periodic cross-border travel.

Another factor which currently affects INS's ability to staff the PACE office is the newly applied cash collection procedures at the land border ports-of-entry. This policy requires that only one INS employee per shift can work a given cash register. Because PACE transactions involve money, this requirement has removed some flexibility for staffing the PACE office throughout a shift. Perhaps there could be a separation of PACE paperwork and PACE transactions, maintaining all administrative duties within the office, but allowing participants to pay their fee with the main I.N.S. cashier for the station, thus negating the need for two registers.

Recommendation 14:

Combine PACE and CANPASS into one jointly-administered program.

Suggestions for implementation:

This recommendation is more fully developed in *Report 5: Recommendations for a Jointly Administered Program.*

Rationale:

Although this is not a new idea (indeed, PACE and CANPASS were originally designed as a joint U.S. – Canadian program), WCOG's survey confirms that the need to complete two application processes is a significant deterrent for many prospective PACE and CANPASS users. If users only had to submit one application and pick up only one enrollment decal, participation would likely increase. Going beyond the application process, more comprehensive changes such as joint data management would offer significant efficiencies for border inspection agencies.

Recommendation 15:

Dedicate non-inspection staff for PACE program administrative duties.

Suggestions for implementation:

(a) Phase in non-inspector positions to handle administrative duties of the PACE program.

Rationale:

Continued success of the PACE program has recently been compromised by INS closures of the PACE office. These closures stall new applications, prevent approved applicants from enrolling, and make it impossible for expired enrollees to renew. Because INS staffs all PACE functions with inspectors, mounting staff shortages have forced INS to shut down PACE office operations in order to keep traffic lanes open (including the PACE lane). Staffing various PACE-office functions with non-inspection staff would be a more efficient and less vulnerable way to ensure regular office hours and continued viability of the program.

3. Conclusions

When more travelers participate in pre-approved travel programs, inspection resources are better utilized, security is improved, and congestion is greatly alleviated at the border. To increase the participation of cross-border travelers in programs such as PACE and CANPASS, efforts should be made in the following areas:

- 1. **Outreach**: Increase awareness of the program and access to program information and applications;
- 2. Enrollment: Take full advantage of opportunities to simplify the application processes;
- Usability: Expand the usability of the programs where no compromise to security exists;
- 4. **Administration**: Streamline and harmonize administration of the programs.

The recommendations in this report provide strategies for increasing PACE and CANPASS participation. Soliciting and pre-approving more low-risk travelers will improve mobility at the border and improve security. In addition, these recommendations support the current initiatives of the U.S. – Canada Shared Border Accord, the Canada U.S. Partnership (CUSP), and the agency goals of U.S. Customs, U.S. Immigration and Naturalization Service, Citizenship and Immigration Canada, and Canada Customs and Revenue Agency.

It is hoped that, with strategic improvements to outreach, enrollment, usability and administration, both PACE and CANPASS can, together, reach their full potential.

4. Appendix

4.1 List of Program Recommendations

Recommendation 1: **Make program information readily available.**

Recommendation 2: Include program fees in promotional content.

Recommendation 3: **Promote eligibility of all U.S. and Canadian citizens to apply.**

Recommendation 4: **Provide estimates of time-savings from PACE and CANPASS.**

Recommendation 5: Adopt a common application form for both PACE and CANPASS.

Recommendation 6: **Develop on-line application forms.**

Recommendation 7: Decrease the application processing times.

Recommendation 8: Improve process for updating and renewing participant

information.

Recommendation 9: Initiate a mail-in renewal process, and make the renewals at

greater intervals.

Recommendation 10: Make information about both programs available at U.S. and

Canadian offices.

Recommendation 11: Provide multiple PACE and CANPASS decals for all family

vehicles.

Recommendation 12: Allow individuals to enroll independent of vehicles.

Recommendation 13: Open the PACE and CANPASS offices on weekends and holidays.

Recommendation 14: Combine PACE and CANPASS into one jointly-administered

program.

Recommendation 15: Dedicate non-inspection staff for PACE program administrative

duties.