March 26, 2020

Dear Acting Secretary Wolf,

During these difficult times, our nation’s first priority should be the protection and health of all who live, work and travel within the U.S. We applaud the Department for its coordination with the Centers for Disease Control and Prevention and the Department of Health and Human Services to ensure proper precautions are taken by the administration and public to prevent the spread of COVID-19. Further, we applaud the administration for delaying the enforcement date of REAL ID requirements, which would have almost certainly caused greater economic uncertainty.

As you know, the economic impacts of the virus are likely dire. Tourism Economics estimates the projected economic downturn of the U.S. travel industry in 2020 as a result of the coronavirus will cost the economy $910 billion from a $355 billion decline in direct travel spending. This will result in 5.9 million lost jobs before May. For some perspective, these figures are more than two times worse than the economic losses following September 11th. Further, these figures assume a recovery will begin sometime in June 2020, which is far from certain. If recovery takes longer, these figures will be much worse.

While U.S. Travel is actively engaged with the administration and Congress to ensure the stabilization of the economy and protection of workers, we must also work to aid the recovery. We applaud the administration for recognizing the challenges enforcing REAL ID requirements on travelers would present to what we hope will be a full and speedy economic recovery. We believe implementing REAL ID enforcement prior to full recovery would severely delay or reverse the travel industry’s ability to recover quickly from the coronavirus crisis. We agree that implementing REAL ID enforcement in this environment of economic uncertainty is unwise, and thank the administration for the delay. Further, we appreciate the Department’s engagement with the industry on the education efforts to travelers, and the flexibility for electronic document collection for DMVs.

As the administration considers a new enforcement date, the travel industry encourages you to ensure that enforcement would not negatively impact the travel and tourism industry. The current growth in the compliance rate coupled with historical recovery rate after significant economic decline indicates even the most optimistic scenario would take at least two years for Americans and the economy to adequately handle enforcement.

First, Americans are far from ready for REAL ID enforcement. In February, DHS reported a mere 35% REAL ID compliance rate. Further, a forthcoming survey conducted by Longwoods International found that while awareness of the upcoming REAL ID enforcement date has increased from 43% last October to 61% today,
there has not been an equivalent increase in compliance rates. An estimated 83 million American travelers (34%) say they do not have any form of identification that will be acceptable after the enforcement date, the same as was estimated in October 2019. Without significant progress in the compliance rates and the development of alternative screening procedures, enforcement will hamper recovery by slowing travel.

To ensure Americans are ready, DHS can certify that access to air travel will not be negatively impacted prior to REAL ID enforcement. This could be accomplished several ways, including modernizing REAL ID issuance to ease citizens’ ability to obtain a REAL ID, implementing alternative identification verification procedures at the checkpoint to ensure travelers unable to obtain a REAL ID are not disallowed from boarding flights, accepting enrollment in TSA’s PreCheck program as acceptable alternative identification, and delaying enforcement until REAL ID compliance rates match today’s identification rates.

Second, as the economic impacts of the coronavirus remain dire and unknown, enforcement should only begin after full recovery. Enforcement prior to full recovery threatens any recovery progress and risks a reversal. The same survey from Longwoods International found if REAL ID enforcement were implemented today, an estimated 67,400 travelers could be turned away and not permitted through the TSA checkpoint on the first day, resulting in $34.9 million in lost travel spending (excluding airfares). These figures balloon to 471,800 air travelers and $244 million in lost spending in the first week, and do not account for the impacts of the coronavirus, which could make the economic decline much more severe.

In these difficult public health and economic times, our first priority must be the health and safety of Americans. Our second priority must be to stabilize the industry and provide relief for workers. We appreciate the recognition that enforcing REAL ID in this environment threatens economic stability.

We appreciate your continued engagement to ensure the health and safety of Americans and your engagement to stabilize the travel industry in these unprecedented times.

Sincerely,

Roger Dow
CEO
U.S. Travel Association