



Office of Government-wide Policy
September 23, 2022

Federal Travel Regulation
GSA Bulletin FTR 23-02

TO: Heads of Federal Agencies

SUBJECT: Marking, Redacting, and Segregating Information When Reporting Travel Data

1. What is the purpose of this bulletin? This bulletin clarifies the Freedom of Information Act (FOIA, 5 U.S.C. § 552) requirement of Federal agencies to reasonably segregate (i.e., withhold) and release (i.e., disclose) only non-exempt information when reporting on the authorized use of first class and business class transportation accommodations (FTR Part 300-70, Subpart B). Further, this bulletin advises that GSA posts data reported to it under FTR Part 300-70, Subpart B to its FOIA electronic reading room. Therefore, agencies along with their legal counsel must review their data for proper release determinations prior to reporting required data to GSA, in accordance with the guidance herein, so as to ensure that protected information is not posted publicly.

2. What is the background of this bulletin? FTR §§300-70.100 through 103 establish the requirements for agencies to report annually on the use of first class and business class transportation by Government travelers on official business. FTR §300-70.103 specifies that agencies are required to submit protected data in the aggregate (i.e., compiled). Pursuant to 5 U.S.C. § 552(a)(2), GSA makes Government travel reports publicly available on its FOIA electronic reading room, which is accessible online at <https://www.gsa.gov/reference/freedom-of-information-act-foia/electronic-reading-room>.

3. What is "protected" data as used in FTR §300-70.103? "Protected" data includes information that is withheld from public disclosure by statute or Executive Order (E.O.). For example, protected data includes information protected by the Privacy Act (5 U.S.C. § 552a), information exempt from disclosure under one of the nine exemptions set forth in FOIA (5 U.S.C. § 552(b)), and information that is classified for national security reasons (e.g., E.O. 13526).

4. What information must we report on the use of first class and business class transportation? If you are an "agency" as defined in FTR §301-1.1, you must report the following information on each trip that included at least one segment of travel where your agency authorized and paid for first class or business class transportation accommodations that were more expensive than the coach class accommodations for the same itinerary:

- a. Travel authorization number;
- b. Traveler name;
- c. Travel start date;
- d. Origin;
- e. Destination;
- f. Travel purpose;
- g. Exception for using first class or business class transportation pursuant to FTR Part 301-10;
- h. Total cost of the ticket(s) containing at least one segment of first class or business class transportation; and
- i. Total cost of the comparative coach class ticket(s) had first class or business class transportation not been used.

5. Are there any exceptions to the first class and business class reporting requirement?

Yes. In accordance with FTR §300-70.103, data that is protected from public disclosure by statute or Executive Order must include the following aggregate information:

- a. Aggregate number of authorized first class and business class trips that are protected from disclosure;
- b. Total cost of actual first class and business class fares paid that exceeded the coach class fare; and
- c. Total cost of coach class fares that would have been paid for the same travel.

Note to §300-70.103: If the aggregate information is also protected from public disclosure then a negative report must be submitted to GSA.

6. When might aggregate (travel) data be protected from public disclosure by statute or Executive Order and withheld? Aggregate data that is individually unprotected (e.g., Destination, Traveler name, etc.) may become protected if the aggregate information reveals an additional association or relationship that:

- a. Meets the standards for protection; and
- b. Is not otherwise revealed in the individual items of information.

7. What information should be withheld and who is responsible for making that determination? Agencies should consult with their legal counsel to identify data that is protected from disclosure by statute or Executive Order before submitting their data to GSA. For example, information about individuals in “personnel and medical files and similar files” under FOIA exemption 6 when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy” must be marked and segregated.

Agencies must mark (i.e., redact) this information as protected from disclosure in the event a FOIA request is received regarding this information, indicate the reason for its withholding, and segregate it from disclosure (i.e., not report this information to GSA). Table 1 below lists the specific data fields and situations when data should be marked and segregated prior to submitting data to GSA.

<u>Information Collected</u>	<u>When Segregated</u>
Traveler First, Middle, & Last Name	Only when exception for accommodating a medical disability or other special need, or for exceptional security circumstances is used
Travel Origin & Destination	Only when exception for exceptional security circumstances is used
Travel Start Date	Only when exception for exceptional security circumstances is used
Travel Authorization Number	Not Segregated
Exception Code	Not Segregated
Purpose Code	Not Segregated
First/Business Class Fare	Not Segregated
Coach Fare	Not Segregated
Reporting Period ID	Not Segregated

Table 1. – Data Fields and Segregation

8. When and how must we report on the use of first class and business class transportation? You must report to GSA’s Office of Government-wide Policy using an electronic reporting tool found at <https://www.travel.reporting.gov/TRAVEL/TRAVELLogin>, as specified in FTR §300-70.102. The reporting period is October 1 through September 30.

9. What is the effective date of this bulletin? This bulletin is applicable upon the date of signature.

10. When does this bulletin expire? This bulletin will remain in effect until explicitly canceled or superseded.

11. Whom should I contact for further information regarding this bulletin? Contact Mr. LaMan Dantzler, Office of Government-wide Policy at 202-615-5399, or by email at LaMan.Dantzler@gsa.gov. Please cite GSA FTR Bulletin 23-02.

By delegation of the Administrator of General Services,

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Krystal J. Brumfield
Associate Administrator
Office of Government-wide Policy