

Terrorist Watchlist: Nomination and Redress Processes for U.S. Persons

GAO-25-108349

Q&A Report to Congressional Requesters

August 14, 2025

Why This Matters

The Terrorist Screening Dataset, commonly referred to as the terrorist watchlist, is a key tool in identifying those who may pose national security threats. Federal agencies, including members of the U.S. Intelligence Community, can share information about individuals to be added to or removed from the terrorist watchlist. However, some U.S. persons (i.e., U.S. citizens, nationals, or lawful permanent residents) have been misidentified as being on the watchlist or remained on the watchlist when no longer warranted. The potential for these issues highlights the importance of the U.S. government having a process—referred to as redress—to mitigate and address them, as appropriate. The watchlisting community's guidance states that redress is to provide a timely and fair review of inquiries, and to identify and correct any errors in the watchlist, protect the public from terrorist threats, and safeguard privacy and civil liberties.

You asked us to review the watchlisting community's processes to prevent, address, and mitigate terrorist watchlist-related issues for U.S. persons. This report is based on publicly releasable information from a sensitive report we issued in March 2025, *Terrorist Watchlist: Actions Needed to Improve Nomination and Redress for U.S. Persons* (GAO-25-106333SU). We omitted information that selected federal agencies deemed sensitive about their specific nomination and redress processes and the number and composition of U.S. persons on the terrorist watchlist. This report describes terrorist watchlist nomination and redress processes for U.S. persons.

Key Takeaways

- The terrorist watchlist and its subsets are used by federal agencies to inform their screening and vetting decisions for various services or benefits, such as issuing a U.S. passport.
- U.S. persons may be nominated for inclusion in the terrorist watchlist if they are known or reasonably suspected to be engaged in terrorism or terrorist activities, or are associated with known or suspected terrorists, among other criteria.
- U.S. persons can seek redress through the Department of Homeland Security Traveler Redress Inquiry Program (DHS TRIP) for travel-related terrorist watchlist issues they experienced (e.g., being unfairly or incorrectly delayed, denied boarding, or subjected to additional screening for their flight).
- There are various other ways that U.S. persons can request information about or pursue redress for alleged terrorist watchlist-related issues, such as filing a Freedom of Information Act request or lawsuit.

- Our March 2025 report made 24 recommendations to seven federal agencies to better help prevent, address, and mitigate terrorist watchlist-related issues for individuals, including those related to misidentifications of U.S. persons.

What is the terrorist watchlist?

The terrorist watchlist was created in response to the attacks on September 11, 2001, and is the U.S. government’s primary effort to consolidate and share information about individuals who may pose terrorist threats to the United States. It is an unclassified but sensitive dataset containing biographic (e.g., first name, last name, date of birth) and biometric (e.g., fingerprints, photographs, iris scans) identifying information about individuals with a nexus to domestic or international terrorism.¹ The Threat Screening Center (TSC)—administered by the FBI—is responsible for maintaining the terrorist watchlist.²

The terrorist watchlist includes data subsets such as the No Fly List, Selectee List, and Expanded Selectee List. As we discuss later, the TSC shares information from these subsets with federal agencies and others that use it to inform their own security screening and vetting decisions. The criteria for including U.S. persons and the impacts they may experience varies by subset (see table 1).

Table 1: Criteria for Inclusion of and Examples of Impacts on Watchlisted U.S. Persons, by Terrorist Watchlist Subset

Watchlist subset	Criteria for inclusion	Examples of impacts
No Fly List	Meets the reasonable suspicion standard, which is that the individual is known or reasonably suspected to be engaged in, has been engaged, or intends to engage in conduct constituting, in preparation for, or in aid or in furtherance of, terrorism or terrorist activities. Further, the individual poses either a threat of (1) committing an act of terrorism with respect to an aircraft, the homeland, or against any U.S. government facility abroad and associated personnel, or (2) engaging in or conducting a violent act of terrorism and is capable of doing so.	U.S. persons are prohibited from boarding any flight that arrives or departs from the U.S. or flies over U.S. airspace.
Selectee List	Meets the reasonable suspicion standard and other criteria that is omitted here because it is sensitive.	U.S. persons are subject to enhanced screening procedures at an airport and may have a Federal Air Marshal assigned to cover their flight. ^b
Expanded Selectee List ^a	Meets the reasonable suspicion standard.	
Other Known or Suspected Terrorists ^c	Meets the reasonable suspicion standard.	Lawful permanent residents may face immigration-related consequences such as denial of an application for naturalization (e.g., citizenship) and entry into the United States.

Watchlist subset	Criteria for inclusion	Examples of impacts
Watchlist Exceptions ^d	Does not meet the reasonable suspicion standard but is connected to or associated with known or suspected terrorists.	U.S. citizens may be denied certain travel-related benefits, such as low-risk security screening by the Transportation Security Administration (TSA). Lawful permanent residents may be subject to enhanced immigration screening and transportation security threat assessment vetting.

Source: GAO analysis of Department of Homeland Security and Threat Screening Center (TSC) documentation. | GAO-25-108349

Note: U.S. persons are U.S. citizens, nationals, or lawful permanent residents. In addition to meeting the reasonable suspicion standard, there must also be sufficient biographic and biometric identifying information to enable screeners to determine whether the individual they are screening is a match to a record in the terrorist watchlist. The identifying information needed to meet the criteria varies by subset and is omitted here because it is sensitive.

^aIndividuals in the Expanded Selectee List do not meet the criteria to be placed in the Selectee List but may experience the same impacts as individuals in the Selectee List. Other ways in which the Expanded Selectee List are different than the Selectee List are omitted here because it is sensitive information. The TSC exports the Selectee and Expanded Selectee Lists to TSA to support airline passenger screening.

^bA Federal Air Marshal is a federal law enforcement officer, under TSA's law enforcement arm, who is responsible for protecting passengers and crewmembers from criminal and terrorist attacks onboard civil aircraft.

^cOther Known or Suspected Terrorists do not meet the criteria to be placed in the No Fly or Selectee Lists. As the default subset for individuals in the terrorist watchlist, the TSC exports this subset to all screening agencies in the watchlisting community.

^dThe TSC exports this subset to the Departments of Homeland Security and State for the purpose of supporting immigration and visa screening functions. This subset may be provided for other purposes, or to other departments and agencies, as approved through established interagency processes. For example, this subset is provided to TSA for credentialing and transportation benefit screening, such as TSA PreCheck®, which allows individuals to expedite traveler screening through participating TSA security checkpoints.

How is the terrorist watchlist used?

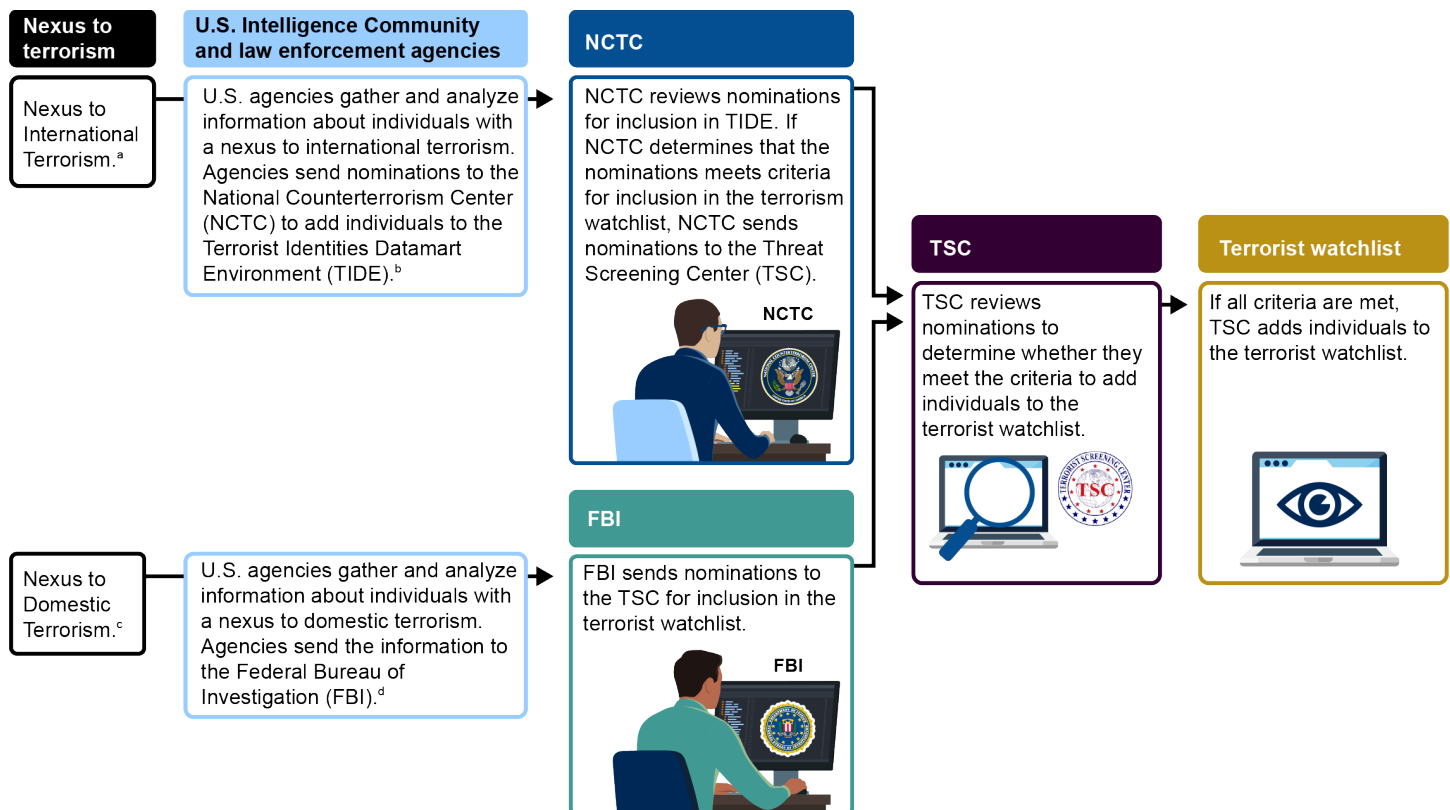
The terrorist watchlist and its subsets are used by federal agencies to inform their screening and vetting decisions for various services or benefits.³ These include U.S. passports, background investigations, security clearances, federal transportation sector worker identification credentials, expedited airport security screening, visas, immigration benefits, and firearms and explosives background checks. The terrorist watchlist is also used by state and local law enforcement when they stop individuals for traffic violations or other offenses. They are informed that they should approach such individuals with caution and to contact the TSC.

Individuals may receive terrorism screenings when they cross the nation's borders, purchase an airline ticket, or apply for a federal credential or security clearance, among other things. For example, individuals on the terrorist watchlist may receive additional screening at an airport or port of entry, not be able to board a domestic flight, or may be denied a federal credential or security clearance. However, individuals may experience similar issues due to some other cause that is unrelated to the terrorist watchlist, such as criminal history, immigration violations, random screening, or other security measures. For example, individuals may be unable to board a flight due to unruly behavior on previous flights.

How are individuals nominated to the terrorist watchlist?

The U.S. Intelligence Community and federal law enforcement agencies nominate individuals, including U.S. persons, to the terrorist watchlist. While the process varies depending on whether the nomination pertains to domestic or international terrorism, the TSC is the final arbiter for accepting or rejecting nominations for both types of terrorism (see fig. 1). Similar processes are also used to remove individuals from the terrorist watchlist as well as modify information about individuals already on the watchlist.

Figure 1: Overview of the Terrorist Watchlist's Nominations Process



Source: GAO analysis of TSC information; elenabsl/stock.adobe.com; FBI crest; NCTC crest. | GAO-25-108349

Note: According to TSC documentation, at any step in the process, if nominations do not meet the criteria for inclusion in the terrorist watchlist, then the nominations are to be rejected.

^aAccording to TSC documentation, international terrorism occurs primarily, or entirely, outside the territorial jurisdiction of the U.S. or transcends national borders. Individuals may be on the terrorist watchlist due to having a nexus to international or domestic terrorism, or both.

^bNCTC, which is part of the Office of the Director of National Intelligence, maintains TIDE, a central repository which contains classified identifying and derogatory information about individuals with a nexus to international terrorism. NCTC shares this information with the TSC to be reviewed for inclusion in the terrorist watchlist.

^cAccording to TSC documentation, domestic terrorism refers to terrorism or terrorist activities as not having a link to foreign intelligence, counterintelligence, or international terrorism. It occurs primarily within the territorial jurisdiction of the United States.

^dThe FBI is the sole agency responsible for investigating purely domestic terrorism information and nominating those with a nexus to domestic terrorism to the terrorist watchlist. The FBI may open a counterterrorism investigation on the individual and submit a nomination to the TSC. If the FBI investigation later determines there is no nexus to terrorism, the FBI is to close the investigation and request that the TSC remove the individual from the watchlist using the same process.

How, if at all, are U.S. persons informed if they are on the terrorist watchlist?

According to the FBI, generally, the U.S. government's policy is to neither confirm nor deny whether a person is on the terrorist watchlist due to security concerns. For example, when state or local law enforcement officers stop individuals for traffic violations or other offenses, the FBI instructs officers to not inform individuals about whether they may be on the terrorist watchlist. According to U.S. government documentation, disclosing a person's watchlist status could reveal the sources, methods, or techniques used to identify or investigate subjects or their activities or associates. This may enable them to alter their behavior, avoid detection, and destroy evidence. Therefore, U.S. persons are typically unaware of their status on the watchlist. However, U.S. persons denied boarding because of their presence on the No Fly List may be apprised of their status through the DHS TRIP process, the primary point of contact for individuals who experience security screening-related difficulties during travel, as we discuss later.

How may U.S. persons be misidentified as being on the terrorist watchlist?

U.S. persons may be misidentified if they share similar biographic or identifying information as someone on the terrorist watchlist or were not removed from the watchlist after their inclusion was no longer merited. For example, some U.S. persons may be misidentified if they share an identical or similar name, date of birth, or other identifier with a person on the watchlist.

In addition, some U.S. persons may be included on the terrorist watchlist in error if they remain on the watchlist when no longer warranted. This may occur if (a) derogatory information on an individual is later determined to be inaccurate, (b) the identifiers of an innocent traveler are mistakenly included in the records of a known or suspected terrorist and then later removed, or (c) changes in circumstances no longer warrant inclusion on the watchlist (e.g., severs ties with a known or suspected terrorist). In the latter case, TSC officials stated that the individual may have been correctly placed on the watchlist at the time of nomination due to available information and known circumstances but could be removed when new or exculpatory information is provided.

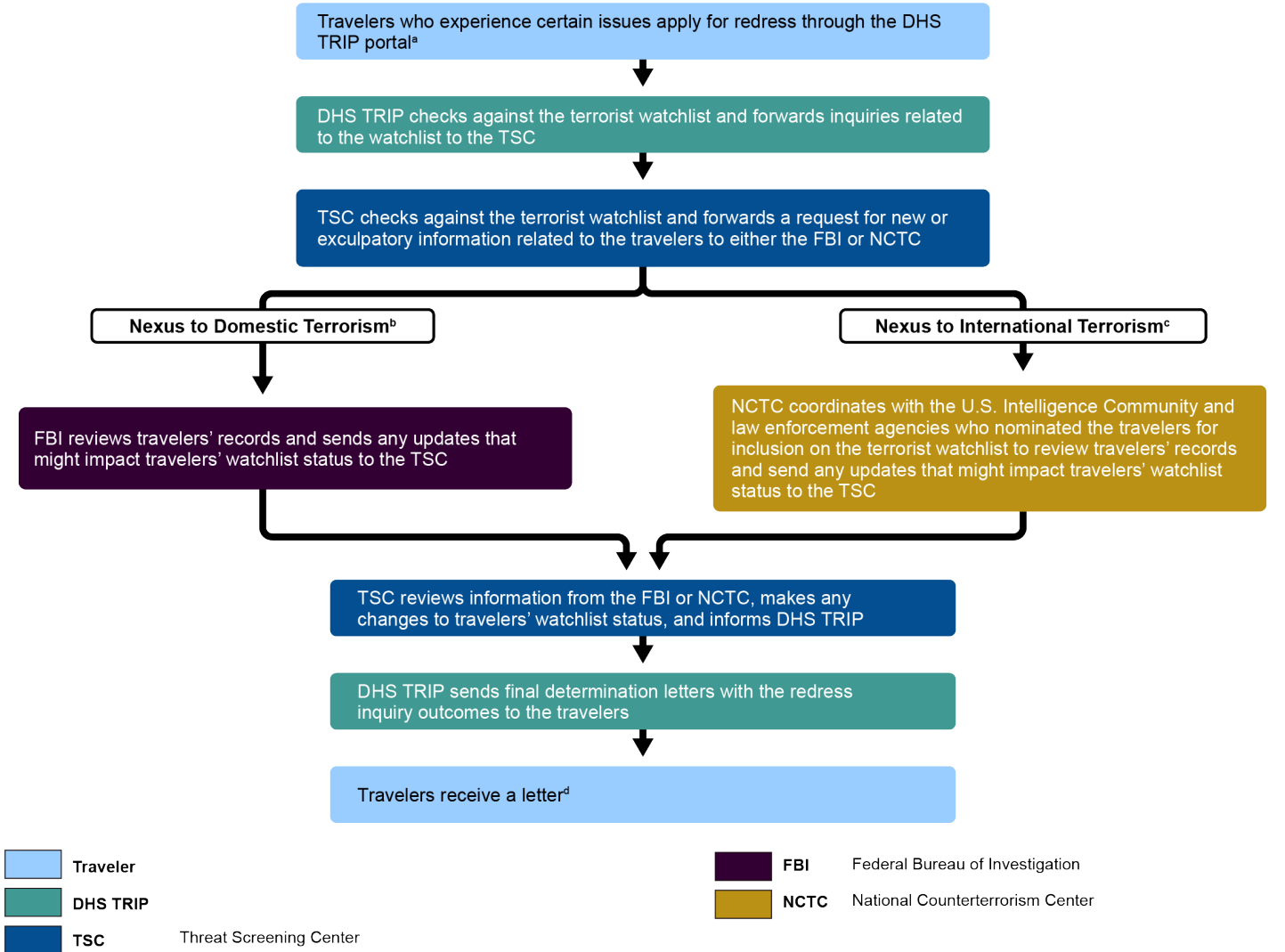
Federal agencies that screen travelers at U.S. borders and airports—U.S. Customs and Border Protection (CBP) and the Transportation Security Administration (TSA)—have processes for addressing and mitigating misidentifications of innocent travelers during security screenings. For example, if the TSC informs CBP that it has misidentified a traveler as potentially being on the terrorist watchlist, CBP will create an override record to indicate that it should not refer the traveler for secondary screening in the future. Additionally, if DHS TRIP informs TSA that it has misidentified a traveler as being on the terrorist watchlist, TSA will add the traveler to its Cleared List. This helps prevent mistakenly identifying such travelers as being high risk for airport security screening.⁴ By addressing and mitigating misidentifications of innocent travelers, CBP and TSA may prevent them from being misidentified in the future.

In our March 2025 report, we identified ways for selected federal agencies to better help prevent, address, and mitigate terrorist watchlist-related issues for individuals, including those related to misidentifications of U.S. persons. See appendix I for a list of our unclassified recommendations from that report.

What is the process for seeking redress through DHS TRIP when U.S. persons have experienced terrorist watchlist-related issues?

As shown in figure 2, U.S. persons can seek redress through DHS TRIP, administered by TSA, for travel-related terrorist watchlist issues that they have experienced (e.g., being unfairly or incorrectly delayed, denied boarding, or subjected to additional screening) by CBP or TSA.⁵

Figure 2: Overview of the Redress Process for Travel-related Terrorist Watchlist Issues through the Department of Homeland Security Traveler Redress Inquiry Program (DHS TRIP)



Source: GAO analysis of DHS TRIP and TSC documentation. | GAO-25-108349

^aTravel-related issues may include, for example, being unable to print a boarding pass; being delayed or denied boarding an aircraft; or being repeatedly referred for secondary screening.

^bAccording to TSC documentation, domestic terrorism refers to terrorism or terrorist activities as not having a link to foreign intelligence, counterintelligence, or international terrorism. It occurs primarily within the territorial jurisdiction of the United States.

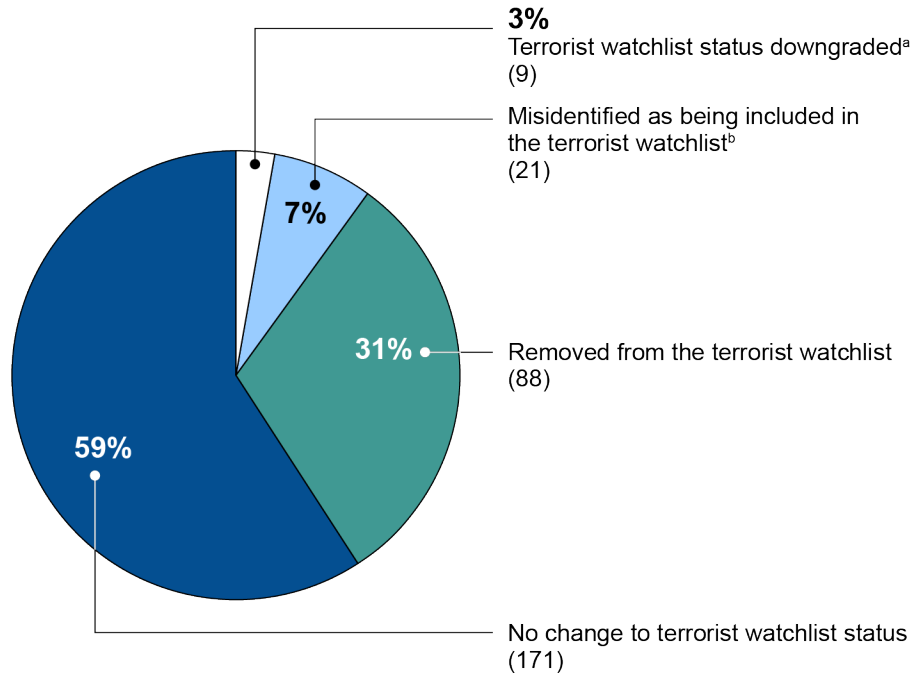
^cAccording to TSC documentation, international terrorism occurs primarily, or entirely, outside the territorial jurisdiction of the U.S. or transcends national borders. Individuals may be on the terrorist watchlist due to having a nexus to international or domestic terrorism, or both.

^dThe letter may state that the necessary changes have been made to the travelers' records. It may also provide a redress control number (i.e., unique seven-digit identifier) that travelers can enter online when purchasing airline tickets to help prevent them from being misidentified as being on the terrorist watchlist or experiencing other terrorist watchlist-related issues.

As we reported in March 2025, according to our analysis of DHS TRIP data, U.S. persons submitted roughly 20,000 redress inquiries to DHS TRIP from December 7, 2021, through September 30, 2023. The vast majority were not related to the terrorist watchlist, such as U.S. persons being randomly selected for additional security screening. We found that 1.5 percent (289) of redress inquiries were related to the terrorist watchlist (i.e., from U.S. persons that were on the watchlist or misidentified as being on the watchlist at the time of their inquiry).⁶ The 289 applicants reported various reasons for seeking redress from DHS TRIP, such as being subjected to additional pre-board screening by TSA, being selected for secondary screening when clearing customs, or having their Global Entry applications denied.⁷

As shown in figure 3, based on our analysis of DHS TRIP data from December 7, 2021, through September 30, 2023, we found that 59 percent (171) of redress inquiries resulted in no change to their terrorist watchlist status, 31 percent (88) resulted in the individual being removed from the watchlist, 7 percent (21) were individuals who had been misidentified as being on the watchlist, and 3 percent (9) resulted in the individual's watchlist status being downgraded (e.g., moved from the No Fly List to the Expanded Selectee List).

Figure 3: Outcomes of Terrorist Watchlist-related DHS TRIP Redress Inquiries from U.S. Persons, December 7, 2021—September 30, 2023



Source: GAO analysis of Department of Homeland Security Traveler Redress Inquiry Program (DHS TRIP) data. | GAO-25-108349

Note: According to DHS TRIP data, U.S. persons (i.e., U.S. citizens, nationals, or lawful permanent residents) submitted 289 terrorist watchlist-related redress inquiries to DHS TRIP during this time period.

^aTerrorist watchlist status downgraded refers to an individual who was removed from a higher subset of the watchlist, in which they may experience more difficulties during travel-related security screenings, and placed on a lower subset, in which they may experience less difficulties.

^bMisidentified as being included in the terrorist watchlist refers to an individual who was mistaken to be on the terrorist watchlist when they were not actually on the watchlist.

After a U.S. person has applied to DHS TRIP for the denial of boarding a flight, U.S. persons on the No Fly List may pursue a process we refer to as the Enhanced Redress Process. Following the normal DHS TRIP Process (referred to as stage one), there is a second stage in which U.S. persons may obtain information not previously disclosed. This information may include confirmation of a “No Fly” watchlist status and, where possible, the reasons for that status. In turn, this may give such applicants an opportunity to submit evidence that may support their removal from the No Fly List or otherwise lead to the correction of errors. In the third stage, the TSA Administrator makes a final determination to send the applicant’s appeal back to the TSC for reconsideration of its No Fly List status determination, maintain the applicant’s No Fly List status, or downgrade or remove the individual from the list.⁸

From December 7, 2021 through September 30, 2023, nine U.S. persons submitted requests for more information about why they were on the No Fly List through the Enhanced Redress Process. Of those nine, one was downgraded from the No Fly List, and eight cases remained active, as of September 30, 2023. One U.S. person requested an administrative appeal (i.e., third stage) about whether they should be on the No Fly List, and that case was closed without removing the person from the list.

What other ways can U.S. persons request information or pursue redress for alleged terrorist watchlist-related issues?

There are various other ways that U.S. persons can request information about, or pursue redress for, alleged terrorist watchlist-related issues. These actions include submitting inquiries to various federal entities that (1) a U.S. person may request terrorist watchlist-related information from, such as Freedom of Information Act offices; (2) redirect the U.S. person to DHS TRIP, such as CBP and TSA Information Centers; or (3) may conduct investigations in response to a U.S. person's terrorist watchlist inquiry, such as Offices of Inspectors General.⁹ However, according to DHS and Department of Justice (DOJ) officials, these actions generally do not lead to a change in, nor result in the disclosure of, a U.S. person's watchlist status.

Entities From Which Individuals May Request Terrorist Watchlist-related Information

- **Freedom of Information Act (FOIA) Offices.** U.S. persons may file a FOIA request for information related to whether they may be on the terrorist watchlist through mail or email to the FOIA office of an agency they experienced an issue with.¹⁰ However, terrorist watchlist information—including watchlist status—typically will not be disclosed under FOIA. For example, according to DHS and DOJ officials, the information, such as associates or other derogatory rationales for inclusion on the watchlist, will be exempt from disclosure or heavily redacted due to security concerns. Federal agencies may provide a written response stating that they can neither confirm nor deny the existence of the records requested under FOIA.
- **Federal Courts.** U.S. persons have sought to challenge their alleged inclusion on the terrorist watchlist by filing a lawsuit in federal court. According to an informal policy and officials from the TSC's Redress Office, if notice of litigation is received concerning an individual who has also submitted a redress inquiry with DHS TRIP that is deemed related to the terrorist watchlist, the office is to coordinate with relevant agencies on reviewing the individual's underlying information and watchlist status. The relevant agencies will be given a deadline of 10 days to send any updates that might impact the individual's watchlist status. As a result, individuals may be removed from the watchlist if they no longer meet the criteria for inclusion. During the litigation process, individuals may request information related to their potential inclusion on the terrorist watchlist or the underlying reasons why they may be on the watchlist. However, officials from the TSC's Redress Office stated that such information would likely be withheld from the individual due to security concerns.

Entities That Redirect Inquiries to DHS TRIP

- **Members of Congress.** Some U.S. persons have inquired about their potential status on the terrorist watchlist with their member of Congress, who may contact DHS TRIP or the TSC's Redress Office on their behalf. DHS TRIP officials told us that when they receive a congressional inquiry regarding an adverse screening experience, they inform the affected individual to submit a redress application through the DHS TRIP portal. According to the standard operating procedures of the TSC's Redress Office, when it receives a congressional inquiry regarding an adverse screening experience, it handles

the congressional inquiry in the same manner as a redress inquiry from DHS TRIP.

- **CBP and TSA Information Centers.** U.S. persons may submit questions, complaints, compliments, or report illegal activity to the CBP Information Center and the TSA Contact Center through their respective websites or by calling the TSA Contact Center. These centers are the main portals in which individuals can contact these agencies to ask questions or to get information. If a U.S. person contacts one of these centers regarding a travel-related terrorist watchlist issue, the U.S. person would either be redirected to DHS TRIP, be referred to another office within DHS, or have their issue resolved by the center.
- **CBP and TSA Ombudsman's Offices.** The CBP Ombudsman's office helps applicants with denials or revocations from CBP's Trusted Traveler Programs, while the TSA Ombudsman's office helps air passengers address their security screening complaints.¹¹ U.S. persons may contact the CBP Ombudsman's office through its website and the TSA Ombudsman's office through email or phone call. If a U.S. person were to contact the CBP or TSA Ombudsman's offices regarding a travel-related terrorist watchlist issue, the offices would direct the person to DHS TRIP, according to officials from the CBP and TSA Ombudsman's offices.

Entities That May Conduct Investigations in Response to Inquiries

DHS and DOJ Offices of Inspectors General. These offices investigate allegations of fraud, waste, and abuse as well as criminal misconduct by their respective department's personnel.¹² U.S. persons can submit civil rights complaints or report criminal misconduct and other illegal activities that may be related to terrorist watchlist issues to the offices. U.S. persons may do so through an allegation form on their public websites, the telephone hotline, fax, or mail. The contact information for the offices were available on their public websites, as of August 2025.

Agency Comments

We provided a draft of this report to the Central Intelligence Agency; the Departments of Defense, Homeland Security, and Justice; and the Office of the Director of National Intelligence for review and comment.

DHS and the Office of the Director of National Intelligence provided comments. In its comments, reproduced in appendix II, DHS stated that it will continue to work with interagency partners to strengthen redress policies and processes and prevent terrorist watchlist issues for all persons. In its comments via email, the Office of the Director of National Intelligence stated that its National Counterterrorism Center prioritizes the review of U.S. person records and addressing terrorist watchlist-related redress inquires through the processes described in this report. It also stated that the National Counterterrorism Center is working closely with the Threat Screening Center and DHS to improve the accountability and timeliness of the redress process in response to our March 2025 report's recommendations.

The Departments of Homeland Security and Justice, and the Office of the Director of National Intelligence, provided technical comments, which we

incorporated as appropriate. The Central Intelligence Agency and Department of Defense did not have any comments on this report.

How GAO Did This Study

We reviewed documentation, such as policies and procedures, and conducted interviews with officials, on terrorist watchlist nomination and redress processes for U.S. persons from eight federal agencies selected based on their watchlisting roles from fiscal years 2019 through 2023.¹³ We also analyzed interagency watchlisting and redress guidance to identify the requirements and responsibilities of these agencies for nomination and redress.

To identify potential terrorist watchlist-related issues that U.S. persons may experience, we interviewed five national associations, including two national civil rights and civil liberties associations and three national law enforcement associations, reviewed a nongeneralizable sample of DHS TRIP redress inquiries, and reviewed court cases involving terrorist watchlist-related issues.¹⁴ The results of our interviews with associations and reviews of DHS TRIP redress inquiries and court cases are not generalizable, but provided insight into potential terrorist watchlist-related issues that U.S. persons may experience. To identify other ways U.S. persons have requested information or pursued redress, we interviewed or obtained written responses from officials from DHS and DOJ entities through which U.S. persons have requested information or pursued redress.¹⁵

We further obtained and analyzed DHS TRIP data from December 7, 2021 through September 30, 2023.¹⁶ To assess the reliability of DHS TRIP data, we reviewed relevant documentation, interviewed or obtained written responses from knowledgeable agency officials, and conducted manual and electronic data testing for missing data, outliers, and obvious errors. We found that the data were sufficiently reliable for the purpose of reporting terrorist watchlist-related issues self-reported by travelers to DHS TRIP.

The performance audit upon which this report is based was conducted from October 2022 to March 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We subsequently worked with selected federal agencies from March 2025 to August 2025 to prepare this unclassified version of the original sensitive report for public release. This public version was also prepared in accordance with these standards.

List of Addressees

The Honorable Gary C. Peters
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

The Honorable Seth Magaziner
Ranking Member
Subcommittee on Counterterrorism and Intelligence
Committee on Homeland Security
House of Representatives

We will send copies of this report to the appropriate congressional committees; the Attorney General; the Directors of the Central Intelligence Agency and National Intelligence; and the Secretaries of Defense and Homeland Security. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

GAO Contact Information

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Appendix I: List of Unclassified Recommendations from GAO-25-106333SU

Table 2 lists recommendations we made in a sensitive report that we issued in March 2025, *Terrorist Watchlist: Actions Needed to Improve Nomination and Redress for U.S. Persons* (GAO-25-106333SU). In that report, we made 24 recommendations to seven selected federal agencies to, among other things, enhance either nomination or redress processes or mechanisms (or both), monitor the timeliness of quality control processes, or establish and monitor redress time frames. The seven agencies that provided comments concurred with all recommendations directed to them.¹⁷ We have omitted four recommendations directed to two agencies that they deemed sensitive. As of August 2025, 1 recommendation has been closed as implemented (recommendation 22 to the Department of Homeland Security), and the other 23 recommendations remain open. We will continue to monitor the agencies' progress in addressing them.

Table 2: Unclassified Recommendations from GAO-25-106333SU

Number	Recommendation
1	The Director of National Intelligence should ensure that the Director of the National Counterterrorism Center develops and implements a process to annually review its nominations of U.S. persons on the terrorist watchlist.

Number	Recommendation
2	Omitted because this recommendation is sensitive.
3	The Director of National Intelligence should ensure that the Director of the National Counterterrorism Center establishes time frames for addressing removals and modifications to Terrorist Identities Datamart Environment records of U.S. persons who are or were nominated to the terrorist watchlist. ^a
4	The Director of National Intelligence should ensure that the Director of the National Counterterrorism Center develops and implements a mechanism to monitor the timeliness of addressing removals and modifications to Terrorist Identities Datamart Environment records of U.S. persons who are or were nominated to the terrorist watchlist.
5	The Attorney General should ensure that the Director of the Terrorist Screening Center develops and implements a mechanism to monitor the extent to which it is addressing its time frames for its biannual review of U.S. persons on the terrorist watchlist. ^b
6	The Attorney General should ensure that the Director of the Terrorist Screening Center develops policies and procedures for providing nominating and originating agencies—upon receipt of notifications of appeals from screening agencies—with any possible updates regarding the underlying derogatory information pertaining to U.S. persons potentially on the terrorist watchlist who are seeking administrative appeals of any determinations in which the terrorist watchlist is used.
7	The Attorney General should ensure that the Director of the Terrorist Screening Center develops policies and procedures for reviewing as appropriate the watchlist status of U.S. persons potentially on the terrorist watchlist who are seeking administrative appeals of any determinations in which the terrorist watchlist is used—upon receipt of updates to underlying derogatory information from nominating and originating agencies.
8	Omitted because this recommendation is sensitive.
9	The Attorney General should direct that the Terrorist Screening Center, as co-chair of the Watchlisting Advisory Council—in coordination with other signatory parties of the <i>Redress MOU</i> —ensures the council develops a process to regularly review the implementation of the <i>Redress MOU</i> and update it as needed. ^c
10	The Director of National Intelligence should direct that the National Counterterrorism Center, as co-chair of the Watchlisting Advisory Council—in coordination with other signatory parties of the <i>Redress MOU</i> —ensures the council develops a process to regularly review the implementation of the <i>Redress MOU</i> and update it as needed.
11	The Director of National Intelligence should ensure that the Director of the National Counterterrorism Center develops and documents standard operating procedures that reflect redress requirements in the <i>Watchlisting Guidance</i> and <i>Redress MOU</i> . ^d
12	The Attorney General should ensure that the Terrorist Screening Center revises the language contained in its terrorist watchlist-related redress requests that are sent to the National Counterterrorism Center to request a response to the inquiry by the suspense date or status updates on the National Counterterrorism Center's coordination efforts by the suspense date.
13	The Attorney General should direct that the Terrorist Screening Center, as co-chair of the Watchlisting Advisory Council, leads the council in developing overall time frames for addressing terrorist watchlist-related redress inquiries, including for the Enhanced Redress Process for U.S. persons on the No Fly List, until such time frames are established. Such time frames could be recommended to the National Security Council, as necessary, to be included in interagency guidance.
14	The Director of National Intelligence should direct that the National Counterterrorism Center, as co-chair of the Watchlisting Advisory Council, leads the council in developing overall time frames for addressing terrorist watchlist-related redress inquiries, including for the Enhanced Redress Process for U.S. persons on the No Fly

Number	Recommendation
	List, until such time frames are established. Such time frames could be recommended to the National Security Council, as necessary, to be included in interagency guidance.
15	The Director of National Intelligence should ensure that the National Counterterrorism Center, once overall time frames for addressing terrorist watchlist-related redress inquiries are established in interagency guidance, establish and document individual time frames that are aligned with these overall time frames. The establishment of individual time frames should be done in coordination with other signatory parties to the <i>Redress MOU</i> .
16	Omitted because this recommendation is sensitive.
17	The Attorney General should direct that the Federal Bureau of Investigation develop a requirement to monitor its time frames for addressing terrorist watchlist-related redress inquiries.
18	The Director of National Intelligence should direct that the National Counterterrorism Center develop a requirement to monitor its time frames for addressing terrorist watchlist-related redress inquiries.
19	Omitted because this recommendation is sensitive.
20	The Secretary of Defense should direct that the Defense Intelligence Agency develop a requirement to monitor its time frames for addressing terrorist watchlist-related redress inquiries. ^e
21	The Secretary of Defense should direct that the National Security Agency develop a requirement to monitor its time frames for addressing terrorist watchlist-related redress inquiries.
22	The Secretary of Homeland Security should direct that the Office of Intelligence and Analysis develop a requirement to monitor its time frames for addressing terrorist watchlist-related redress inquiries related to nominations from all Department of Homeland Security components. ^f
23	The Administrator of the Transportation Security Administration should develop a process for the Department of Homeland Security Traveler Redress Inquiry Program to regularly review and update customer feedback survey questions.
24	The Administrator of the Transportation Security Administration should develop a process for the Department of Homeland Security Traveler Redress Inquiry Program to regularly analyze customer feedback survey results to identify and implement needed improvements, including its service delivery and customer experience, to help the program to meet the goal of the terrorist watchlist redress process.

Source: GAO analysis of GAO-25-106333SU. | GAO-25-108349

^aThe National Counterterrorism Center's Terrorist Identities Datamart Environment is a central repository which contains classified identifying and derogatory information about individuals with a nexus to international terrorism.

^bIn late March 2025, after we made the recommendations, the FBI renamed the Terrorist Screening Center to the Threat Screening Center.

^cThe Watchlisting Advisory Council is to regularly review interagency guidance, such as the 2007 Memorandum of Understanding on Terrorist Watchlist Redress Procedures (*Redress MOU*). In this report, we refer to the *Redress MOU* as interagency redress guidance.

^dIn this report, we refer to *Watchlisting Guidance* as interagency watchlisting guidance.

^eIn May 2025, the Department of Defense stated that it is taking steps to address recommendations directed to it. We will continue to monitor the department's progress in fully addressing these recommendations.

^fIn April 2025, the Department of Homeland Security Office of Intelligence and Analysis provided documentation to demonstrate that it has taken steps to fully address this recommendation.

Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

BY ELECTRONIC SUBMISSION

July 10, 2025

Tina Won Sherman
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-25-108349, "Terrorist Watchlist:
Nomination and Redress Processes for U.S. Persons"

Dear, Ms. Won Sherman:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS, or the Department) appreciates the U.S. Government Accountability Office's work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note the Government Accountability Office's recognition that the U.S. Customs and Border Protection and the Transportation Security Administration (TSA) have processes for addressing and mitigating misidentification of innocent travelers during security screenings. The Government Accountability Office also highlighted that redress inquiry data from the DHS Travel Redress Inquiry Program was reliable for the purpose of reporting terrorist watchlist-related issues self-reported by travelers to the DHS Travel Redress Inquiry Program.

The Department remains committed to ensuring all DHS personnel involved in redress requests for terrorist watchlist-related issues perform their duties timely and effectively, while respecting civil rights and civil liberties protections of all persons. DHS will continue to work with interagency partners to strengthen redress policies and processes and prevent Terrorist Watchlist issues for all persons by enhancing, identifying, and implementing improvements to the service delivery and customer experience, as appropriate.

The draft report contained 24 recommendations in a sensitive report issued in March

2025,¹ including three recommendations to DHS with which the Department concurred. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for the Government Accountability Organization's consideration, as appropriate.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future

Sincerely,

JEFFREY M. BOBICH
Digitally signed by
JEFFREY M. BOBICH
Date: 2025.07.10
16:33:22 -0400

JEFFREY M. BOBICH
Senior Official Performing the
Duties of the Chief Financial
Officer

Enclosure

¹ GAO-25-106333SU, "TERRORIST WATCHLIST: Actions Needed to Improve Nomination and Redress for U.S. Persons," dated March 6, 2025.

**Enclosure: Management Response to Recommendations
Contained in GAO-25-108349**

The Government Accountability Organization recommended that the Secretary of Homeland Security direct the Office of Intelligence and Analysis (I&A) to:

Recommendation 22: Develop a requirement to monitor its time frames for addressing terrorist watchlist-related redress inquiries related to nominations from all Department of Homeland Security components.

Response: Concur. DHS previously noted that the I&A Identities, Targeting, and Exploitation Center would update its current guidance governing use of the DHS Watchlisting Framework, which is the technical platform supporting counterterrorism watchlisting.² I&A's Homeland Identity Intelligence Center updated guidance titled, "DHS Watchlisting Program Guidance" dated June 2024, and a "Coordination Aid" job aid, dated May 2025, which address creating processes for capturing and monitoring redress time frames using the DHS Watchlisting Framework. Pursuant to this guidance, the watchlisting team shall provide responses to redress requests within 30 or 45 days, depending on priority level. The watchlisting team will also monitor and record response times on a quarterly basis.

The updated DHS Watchlisting Program Guidance also addresses:

- the responsibility for the Homeland Identity Intelligence Center watchlisting team to respond to all redress inquiries;
- an explanation of "redress;" and
- a section noting watchlisting team prioritizes coordination requests and attempts to respond in timely manner and establishing expected timeframes.

The updated job aid is intended to ensure the watchlisting team remain familiar with processes and responsibilities for coordinating with Interagency partners, generally, and with redress, specifically. Further, the job aid includes an explanation of redress and expectations in processing time frames, and procedures for addressing Quality Assurance referrals, which includes redress inquiries.

As a result of this updated guidance, watchlisting team personnel captured and monitored time frames for redress responses to queries closed between the first quarter of fiscal year (FY) 2024 and the second quarter of FY 2025, and noted that:

- The watchlisting team averaged an 11-day response time over the entire period;

² The Watchlisting Framework is the working environment in which DHS analysts build, manage, and store profiles of persons linked to terrorism for submission to the National Counterterrorism Center for inclusion into the Terrorist Identities Datamart Environment.

- The average processing time for redress requests received between the fourth quarter of FY 2024 and the second quarter of FY 2025 dropped from 12 days to 11 days; and
- Many variables affect response times including staffing, coordination with DHS partners, training, and other competing priorities.

We request that GAO consider this recommendation resolved and closed, as implemented.

GAO recommended that the Administrator of TSA:

Recommendation 23: Develop a process for the Department of Homeland Security Traveler Redress Inquiry Program to regularly review and update customer feedback survey questions.

Response: Concur. The DHS Travel Redress Inquiry Program will develop a process for reviewing and updating customer feedback survey questions. As part of this effort, in April 2025, the DHS Travel Redress Inquiry Program concluded a preliminary review and revision of survey questions to be incorporated into the overall process of a redress application. The newly formulated and revised survey questions will require approval from TSA, DHS, and the Office of Management and Budget prior to use; TSA leadership granted approval for the survey questions in May 2025. The DHS Travel Redress Inquiry Program is currently working with DHS headquarters and the Office of Management and Budget personnel, as appropriate, to obtain approval for the survey questions.

Concurrently with the development of the new survey questions, the DHS Travel Redress Inquiry Program system development team completed a proof of concept for integrating the survey into the DHS Travel Redress Inquiry Program's Salesforce case management system in April 2025. Once complete, this integration will facilitate the distribution of the survey and streamline data collection processes. Furthermore, the continuous review and update of the survey questions will be simplified with their integration into the system.

Enhanced survey data collection through the system will enable the DHS Travel Redress Inquiry Program to utilize survey results in Salesforce reports, ensuring regular review and updates of the survey. Based on the data, the DHS Travel Redress Inquiry Program will then be able to determine which questions yield valuable insights and which do not. These findings will, in turn, contribute to more effective fulfillment of Recommendation 24 by identifying necessary improvements to achieve the DHS Travel Redress Inquiry Program's objectives. Estimated Completion Date: June 30, 2026.

Recommendation 24: Develop a process for the Department of Homeland Security Traveler Redress Inquiry Program to regularly analyze customer feedback survey results

to identify and implement needed improvements, including its service delivery and customer experience, to help the program to meet the goal of the terrorist watchlist redress process.

Response: Concur. Once the process for reviewing and updating customer feedback survey questions is complete, estimated to be no later than June 30, 2026, the DHS Travel Redress Inquiry Program will develop a process to regularly analyze the results of the customer feedback survey to identify and implement needed improvements. Estimated Completion Date: June 30, 2027.

5

Endnotes

¹According to TSC documentation, domestic terrorism refers to terrorism or terrorist activities as not having a link to foreign intelligence, counterintelligence, or international terrorism. It occurs primarily within the territorial jurisdiction of the United States. According to TSC documentation, international terrorism occurs primarily, or entirely, outside the territorial jurisdiction of the U.S. or transcends national borders. The term “nexus” refers to an association with or relation to terrorism. An individual can have a nexus to both domestic and international terrorism. Federal law defines domestic terrorism at 18 U.S.C. § 2331(5) and international terrorism at 18 U.S.C. § 2331(1).

²In late March 2025, the FBI renamed the Terrorist Screening Center to the Threat Screening Center.

³According to TSC documentation, inclusion on the terrorist watchlist does not inherently preclude the watchlisted person from being eligible for a service or benefit.

⁴If added to the TSA Cleared List, travelers who correctly use their redress control number when making a reservation should not experience delays or inconveniences associated with being misidentified on the terrorist watchlist.

⁵Travelers may use DHS TRIP to seek redress for non-terrorist watchlist related issues. With CBP, individuals may experience customs and border issues (e.g., selected for secondary screening when clearing customs or, having their Global Entry applications denied). With TSA, individuals may experience aviation-related issues (e.g., denied boarding or subjected to additional pre-board screening). CBP and TSA have reconsideration processes for travelers denied or revoked from a trusted traveler program, such as Global Entry. These programs allow for expedited screening or inspection of preapproved, low-risk travelers at certain domestic and international airports and at select land and sea ports of entry.

⁶We are reporting DHS TRIP data from December 7, 2021, which is when DHS TRIP implemented a new application portal for accepting and responding to redress inquiries, through fiscal year 2023, the most recent full fiscal year at the time of our review. DHS TRIP officials told us that they did not track all the data we needed for our review prior to December 7, 2021.

⁷Global Entry is a CBP program that allows for an expedited inspection process for pre-approved, low-risk travelers upon arrival in the United States.

⁸Terrorist watchlist downgrades refer to lowering the applicant's status on the watchlist, such as removing them from the No Fly List and placing them on the Selectee List.

⁹In addition, administrative appeals processes allow individuals to appeal adverse adjudicative determinations regarding background investigations, federal credentials, security clearances, and other matters. U.S. persons who are screened using the terrorist watchlist and have their federal credential or security clearance denied or revoked may seek redress through the respective screening agency's administrative appeals processes. For example, during the administrative appeals process for a denied or revoked federal transportation sector worker identification credential, the TSA may provide a letter to the applicant summarizing the underlying derogatory information that led to the denial or revocation of the credential, but would not confirm whether the applicant is on the terrorist watchlist.

¹⁰FOIA is one of several laws that improve the public's access to government information and promote the principles of openness and accountability in government. FOIA requires federal agencies to provide the public with access to certain government records. Under FOIA, a person has a right to obtain access to federal agency records except to the extent the records are protected from disclosure under specific FOIA exemptions or exclusions. 5 U.S.C. § 552.

¹¹Trusted Traveler Programs provide expedited screening for pre-approved members during travel and include TSA PreCheck®, CBP's Global Entry, and Secure Electronic Network for Travelers Rapid Inspection programs.

¹²While Offices of Inspectors General may conduct investigations in response to inquiries, these offices may not provide redress or other remedy to the complainants. Rather, these offices may make policy recommendations to the departments or components to address any deficiencies.

¹³The eight selected federal agencies are the Central Intelligence Agency, CBP, Defense Intelligence Agency, DHS Office of Intelligence and Analysis, FBI, National Security Agency, the Office of the Director of National Intelligence's National Counterterrorism Center, and TSA. According to the National Security Agency, the agency collects and reports foreign signals intelligence information, which may include the communications of U.S. persons, among other things.

¹⁴We selected these five associations because they represented various federal and nonfederal entities and groups of individuals who may experience terrorist watchlist-related issues, such as civil rights and law enforcement organizations. These associations were the (1) Arab American Anti-Discrimination Committee, (2) Council on American-Islamic Relations, (3) Federal Law Enforcement Officers Association, (4) International Association of Chiefs of Police, and (5) National Fusion Center Association. Our nongeneralizable sample included 50 out of 289 (17 percent) DHS TRIP redress inquiries from U.S. persons who were on the terrorist watchlist from December 7, 2021 through September 30, 2023. Examples of court cases reviewed include *Latif v. Holder*, 28 F. Supp. 3d 1134 (D. Or. 2014); *Tanvir v. Tanzin*, No. 13-cv-06951 (S.D.N.Y. filed Oct. 1, 2013).

and No. 23-738 (2d Cir. filed July 29, 2016); *Elhady v. Kable*, 391 F.Supp. 3d 562 (E.D.V.A. 2019) and 993 F. 3d 208 (4th Cir. 2021); and *Chebli v. Kable*, No. 21-cv-00937 (D.D.C. filed Apr. 6, 2021).

¹⁵We selected DHS and DOJ because they are the primary departments that provide terrorist watchlist redress through DHS TRIP and TSC's Redress Office, respectively.

¹⁶We are reporting DHS TRIP data from December 7, 2021, which is when DHS TRIP implemented a new application portal for accepting and responding to redress inquiries, through fiscal year 2023, the most recent full fiscal year at the time of our analysis. DHS TRIP officials told us that they did not track all the data we needed for our review prior to December 7, 2021.

¹⁷The seven agencies were the Central Intelligence Agency, DHS (including CBP, Office of Intelligence and Analysis, and TSA), the Department of Defense (including the Defense Intelligence Agency and National Security Agency), and DOJ (including the FBI). We did not receive comments from the Office of the Director of National Intelligence's National Counterterrorism Center.