

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Application for a U.S. Passport**

**OMB #1405-0004 (DS-11)**

**A. JUSTIFICATION**

1. The Application for a U.S. Passport (Form DS-11) is used by citizens and non-citizen nationals (hereinafter, collectively referred to as “nationals”) of the United States who are applying for a U.S. passport (a travel document attesting to one’s identity and U.S. nationality), and who must apply in person.

The DS-11 solicits data necessary for Passport Services to issue a United States passport (book and/or card format) in the exercise of authorities granted to the Secretary of State in 22 United States Code (U.S.C.) Section 211a et seq. and Executive Order (E.O.) 11295 (August 5, 1966) for the issuance of passports to U.S. nationals.

The issuance of U.S. passports requires the determination of identity, nationality, and entitlement with reference to the provisions of Title III of the Immigration and Nationality Act (INA) (8 U.S.C. sections 1401-1504), the 14<sup>th</sup> Amendment to the Constitution of the United States, other applicable treaties and laws, and implementing regulations at 22 C.F.R. Parts 50 and 51. The specific regulations pertaining to the Application for a U.S. Passport are at 22 C.F.R. 51.20 and 51.21.

2. The information collected on the DS-11 is used primarily to facilitate the issuance of passports to U.S. nationals. The primary purpose for soliciting the information is to establish nationality, identity, and entitlement to the issuance of a United States passport or related service, and to properly administer and enforce the laws pertaining to issuance thereof.

The DS-11 is retained in the files of the Department of State, along with other documentation related to passport applications, adjudication, and issuance. Among other uses within the Department of State, these records are consulted when a U.S. passport has been lost, and the bearer has no evidence of nationality available or in support of any derivative claims to nationality made by an applicant’s children. The records may also be consulted by consular personnel in the event of an emergency abroad involving Americans: the application has a block for the name, address, and telephone number of a person to notify in the event of an emergency. Information from the DS-11 may also be shared with certain parties outside of the Department of State, as permitted by the Privacy Act of 1974, as amended, including as set forth in the Department of State’s Prefatory

Statement of Routine Uses, (the Department's System of Records Notice (SORN) for Passport Records (STATE-26), and the SORN for Overseas Citizens Services Records (STATE-05).

The DS-11 becomes part of the applicant's passport file, which is covered by the Privacy Act. The information contained in this file cannot be released except as provided by the Privacy and Freedom of Information Acts.

Intentionally making a false statement on the DS-11 may constitute a violation of 18 U.S.C. sections 1001, 1542, and/or 1621.

3. The DS-11 is currently available online at <http://www.travel.state.gov>. However, the DS-11 cannot be submitted electronically. As required by 22 C.F.R. Part 51, all DS-11 applicants (and applicants under 16) must appear in person for the execution of a passport. The form will be on the Department's website where it can be filled out on-line and printed for manual signature and submission. With the completed application, a 2-D barcode is printed on each application. This barcode is scanned by Passport Services, and automatically records the applicant's information in our system. This process saves both Passport Services and the applicant time and reduces errors.
4. Aside from necessary basic self-identification data, the information requested does not duplicate information available elsewhere. The DS-11 is the sole Department of State form used by first-time applicants and individuals not eligible to apply for a U.S. passport book and/or passport card using the "U.S. Passport Renewal Application for Eligible Individuals" (Form DS-82), which is submitted by mail.
5. This collection of information does not significantly impact small businesses or other small entities.
6. The information collected on the DS-11 is crucial for documenting a U.S. citizen's request for a replacement passport and for establishing the applicant's entitlement to a replacement U.S. passport.
7. No such special circumstances exist.
8. The 60-day Federal Register Notice soliciting public comment was published on April 17, 2013 (78 FR 22936) and closed June 16, 2013. The Department of State received no comments on the 60-day notice in the *Federal Register*.

However, a 60-day public comment was received on the proposed DS-82, "*U.S. Passport Renewal Application for Eligible Individuals*" form regarding the wording in the Electronic Passport Statement. The commenter stated that he was confused about which type of passport to select when completing the form because the instructions refer to "a type of electronic passport book containing an embedded electronic chip and called an "Electronic Passport."

In response, the Department replied with the following:

All passport books issued by the U.S. Department of State at this point in time are Electronic Passports Books that contain an embedded electronic chip. The Electronic Passport Statements in the Instructions sections in all public-use passport forms do not currently state this fact clearly. Therefore, as the result of this suggestion, the Department has revised the first sentence of the Electronic Passport Statement in the DS-82 as well as all other Public-Use Passport Forms from “*The U.S. Department of State now issues a type of passport book containing an embedded electronic chip called an “Electronic Passport”*” to read: “*The U.S. Department of State now issues an “Electronic Passport” book, which contains an embedded electronic chip.*”

Therefore, this change has been made to the Electronic Passport Statement on Instruction Page 4 of the DS-11.

9. This information collection does not provide any payment or gift to respondents.
10. This form includes a Privacy Act Statement explaining the routine uses of the information collected under the Act. There are no promises of confidentiality to the respondents other than those contained in federal statutes and regulations.
11. The DS-11 does not ask questions of a sensitive nature. The DS-11 collection of information asks the respondent to provide a Social Security number in order to help confirm the applicant’s identity. The applicant’s identity must be established before a passport can be issued. Moreover, passport applicants are requested to submit their Social Security numbers with the passport application (26 U.S.C. 6039E).
12. Passport Services estimates that the average time required for this information collection is 1 hour and 35 minutes or 95 minutes per response. Therefore the estimated total annual burden for the collection is:

$10,351,043$  (number of respondents)  $\times$   $95$  (minutes) /  $60 =$  **16,389,151** hours per year.

To estimate the cost to respondents for this form based on the hourly wage and weighted wage multiplier, the Department calculated the following:

$\$22.60$  (mean hourly earnings based on estimated income per hour from the Bureau of Labor Statistics)  $\times$   $1.4$  (weighted wage multiplier) = **\\$31.64** weighted wage

$16,389,151$  (annual hours)  $\times$   $\$31.64$  (weighted wage) = **\\$518,552,738.** (hour burden cost)

The estimated number of minutes required per response is based on a sampling of the time required to search existing data sources, gather the necessary information, provide the information required, review the final collection, and submit the collection to Passport Services for processing. The sampling was completed through consultation with a group

of Consular Affairs employees to validate the time. In addition, Passport Services has increased the estimated number of minutes per response from the previous 85 minutes to 95 minutes to allow for travel time for applicants to travel to their local United States Postal Service (USPS) facility to submit their application.

13. To properly complete and submit a DS-11 passport application, an applicant must provide the following as specified on instruction page 1:
- Proof of identity - submit a photocopy of the front and back side of your original identification. (The estimated cost of a black and white copy is based on a quote from FedEx Office.)
  - Submit a photograph that meets criteria specified in the instruction pages with a national average cost of \$10 a set. (The estimated cost of photographs is based on a sampling through consultation with a small group of actual respondents.)

DS-11 applications are only accepted in-person, therefore, there are no postage fees. According to the Department, the overwhelming majority of respondents submit their application to their local USPS for processing, which is estimated to be an average distance of approximately 3 miles one way and 6 miles round trip. This distance is estimated to take an amount of five (5) minutes each way for a total of 10 minutes round trip.

Also, to determine the travel cost to the respondent, the Department is factoring in the General Services Administration (GSA) reimbursement rate of \$0.56 mile for privately owned automobiles (POA) use as of January 1, 2014.

[http://www.gsa.gov/portal/content/100715?utm\\_source=OGP&utm\\_medium=print-radio&utm\\_term=mileage&utm\\_campaign=shortcuts](http://www.gsa.gov/portal/content/100715?utm_source=OGP&utm_medium=print-radio&utm_term=mileage&utm_campaign=shortcuts)

Therefore, the cost to the respondent to travel this distance is estimated to be approximately **\$34,779,504**.

10,351,043 (number of respondents) x 6 (miles) x \$0.56 (miles) = **\$34,779,504**.

When combining all of the individual estimated cost burdens associated with Form DS-11, the total annual cost burden for approximately 10,351,043 applicants is \$142,844,393.

A complete breakdown of the involved costs is outlined below.

Identity Proof - Black & White Copy (2 @ \$0.22 each)	10,351,043	x	\$ 0.44	=	\$ 4,554,459.
Passport Photo Set (1)	10,351,043	x	\$10.00	=	\$ 103,510,430.
Average Travel Cost	10,351,043 x 6 miles	x	\$ 0.56	=	\$ 34,779,504.
<b>Total Cost to Respondents</b>					<b>\$ 142,844,393.</b>

14. The Department pays a contractor for materials and/or supplies purchase functions to produce the DS-11. The estimate provided to the Department by the contractor includes cost for contractor labor, supplies, equipment, printing, materials, delivery, overhead, support staff, etc. Using the estimated projection of 10,351,043 respondents per year for FYs 2013 – 2016 at a cost of \$35.00 per thousand, the contractor cost to the Federal Government is **\$362,285**.

Also, the Department is providing the passport specialist time and salary cost which was derived using 2011 Time and Motion (T&M) Study numbers that measured processes conducted by passport specialists. This includes time spent to adjudicate (accept, review, and render a decision) specific forms. These average times were then used to calculate a weighted average of the number of respondents (application receipts) for each form, to account for differing amounts of time required to adjudicate a particular form. For forms that were not measured during the T&M study, no adjudication time multiplier was applied to the estimated number of respondents. The weighted averages were then converted into percentages and multiplied by the total estimated salary and total number of hours spent on adjudication tasks for passport specialists to arrive at the cost and time required to process each form. The total estimated salary is based on the existing ratio of grade levels at each passport agency and locality pay; the total number of hours is adjusted to reflect time spent only on adjudicative tasks.

Therefore, the DS-11 passport specialist adjudication cost is calculated as follows:

$1.6 \text{ (adjudication time multiplier)} \times 10,351,043 \text{ (respondents)} / 21,765,378 \text{ (total weighted average. of respondents, all PPT forms)} \times \$82,165,237 \text{ (total passport specialist salary)} = \mathbf{\$62,521,011}$

Or using numbers only,

$[(1.6 \times 10,351,043) / (21,765,378)] \times \$82,165,237 = \$62,521,011$

With regard to the material costs (use of office supplies, printing, overhead, etc.) incurred by the passport specialist when adjudicating the DS-11, the Department has determined these costs to be negligible.

Therefore, the total cost to the Government is:

$\$362,285. \text{ (contractor)} + 62,521,011. \text{ (passport specialist adjudication)} = \mathbf{\$62,883,296}$ .

15. The hour burden adjustments indicated reflect a decrease in the number of projected respondents from 12,500,000 (previous 2010 - 2013) to 10,351,043 (FYs 2013 – 2016). The previous number of respondents was estimated based on a 2009 projection for those three years. However, using actual receipts for 2010 – 2012, the average total amounted to 8,963,506. While demand decreased slightly in 2011, it began to rise again in 2012. The annual number of respondents projected to use the DS-11 for the next three years was adjusted to reflect the actual demand while taking into account a steady increase for FYs 2013 through 2016.

Demand forecast projections, by their nature, will have some uncertainty in their accuracy, which can explain differences between actual and forecast.

The change in respondent costs is due to the elimination of the fees that were incorrectly attributed as a Cost to Respondent in the last submission, and the addition of the costs of providing passport photographs and photocopies for proof of identity.

In addition to general format changes, the following content changes have been made to the form:

- Page 1 Instructions – The following heading and section were moved from page 3 to page 1 and have been revised to now read:
  - LOST OR STOLEN - You are required to submit a Form DS-64, Statement Regarding a Lost or Stolen Passport, when your valid or potentially valid U.S. Passport book or U.S. Passport card cannot be submitted with this application.
  - IN MY POSSESSION - If your most recent passport book and/or passport card was issued less than 15 years ago, and you were over the age of 16 at the time of issuance, you may be eligible to use Form DS-82 to renew your passport by mail. If your most recent passport is valid and needs additional pages, you can submit your passport, form DS-4085, and the current fee.
- Page 1 Instructions - In the “Special Requirements For Children” section, “If Only One Parent Appears...”, the words “government-issued photo” were added between the words “parent’s” and “identification”.
- Page 2 Instructions - Under the heading “1. Proof of Citizenship”, first section, the word “Country” in the last sentence has been replaced with the word “county”.
- Page 3 Instructions - Under the heading “Protect Yourself Against Identity Theft!...”, the statement, “For more information or to report...” has been revised to now read “For more information regarding reporting a lost or stolen U.S. passport book or passport card and the Form DS-64, your eligibility to submit a Form DS-82 or how to request additional visa pages, call NPIC at 1-877-487-2778 or visit [travel.state.gov](http://travel.state.gov)”.
- Page 3 Instructions - At the bottom of the page, added a new heading and section: “Special Notice to U.S. Passport Card Applicants Only”, regarding the 24 character name limit.
- Page 4 Instructions - Under the heading “Electronic Passport Statement”, the first sentence, “The U.S. Department of State now issues a type of passport book containing an embedded electronic chip called an “Electronic Passport.” has been revised to read “The U.S. Department of State now issues an “Electronic Passport” book, which contains an embedded electronic chip.”
- Page 1 Form - In the photo box, the words “Attach a recent color photograph” have been replaced with “Attach a color photograph taken within the last six months”.
- Page 2 Form - Line Item 14 “Travel Plans” has been renumbered as Line Item 18. Also, the words “Date of Trip” have been replaced with “Departure Date”, and the words “Duration of Trip” have been replaced with “Return Date”.

- Page 2 Form - Line Item 18 “Permanent Address” has been renumbered as Line Item 19.
- Page 2 Form - Under the heading, “PLEASE DO NOT WRITE BELOW THIS LINE-FOR ISSUING OFFICE ONLY”, the following changes have occurred:
  - o The “checkbox” and words “Sole Parent” have been deleted.
  - o The words “USCIS” and “USDC” have been added between “Nat./Citz. Cert.” and “Date/Place Acquired:”
  - o Beside “Report of Birth”, the numbers “240”, “545”, and “1350” have been deleted.
  - o The “DS-60” checkbox has been replaced with “IRL”.
- Page 2 Form - Under the heading, “PLEASE DO NOT WRITE BELOW THIS LINE-FOR ISSUING OFFICE ONLY”, the following change has occurred: A new checkbox “P/C of Citz” has been added.

The Department estimates that the above changes will not result in an increase in the revised burden time from 85 to 95 minutes, which was increased by 10 minutes for travel time, as detailed under item 13.

16. Quantitative summaries of Department of State passport activities are published periodically on the Department of State website at [www.travel.state.gov](http://www.travel.state.gov). Such summaries do not involve the use of complex analytical techniques.
17. The expiration date for OMB approval will be displayed.
18. The Department is not requesting any exceptions to the certification statement.

**B. Collection of Information Employing Statistical Methods**

This collection does not employ statistical methods.