

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
OMB #1405-0133
Affidavit Regarding a Change of Name, DS-60**

A. JUSTIFICATION

1. The Affidavit Regarding a Change of Name (DS-60) is submitted in conjunction with an application for a U.S. passport. It is used by the Department of State to collect information for the purpose of establishing that a passport applicant has adopted a new name without formal court proceedings or a marriage and has publicly and exclusively used the adopted name over a long period of time (generally five years). The affidavit must be executed by an affiant who has personal knowledge of the facts of the applicant's use of both their birth name and their newly adopted name in question.

The DS-60 solicits data necessary for the Department of State to issue a United States passport 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. citizens and non-citizen nationals.

The issuance of a U.S. passport requires the determination of identity and citizenship and/or nationality with reference to the provisions of Title III of the Immigration and Nationality Act (INA) (8 U.S.C. sections 1401-1504), the 14th Amendment to the Constitution of the United States, and other applicable laws. Implementing regulations are at 22 CFR Parts 50 and 51.

2. The information collected on the DS-60 is used to facilitate the issuance of passports to U.S. citizens and non-citizen nationals. The primary purpose for soliciting the information is to establish that a passport applicant has adopted a new name without formal court proceedings or through marriage and has publicly and exclusively used an adopted name over a long period of time (generally five years).

The DS-60 is retained in the files of the Department of State, along with other documentation related to passport applications, adjudication, and issuance. Among other uses, 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. Information from the DS-60 may also be shared with outside users, and for uses as provided for in the Privacy Act, or set forth in the Department of State's Prefatory Statement of Routine Uses relative to the Privacy Act (Public Notice 6290 of July 15, 2008), or the Department's System of Records Notice (STATE-26) for passport records.

The DS-60 becomes part of the applicant's passport file and, thus, of an existing Privacy Act system of records retrievable under the applicant's name. The information contained in this form cannot be released except as provided by the Privacy and Freedom of Information Acts and Department of State implementing regulations at 22 CFR Part 171;

those regulations designate Passport Records (STATE 26) as exempt from certain requirements of the Privacy Act. See 22 CFR 171.36.

In addition to this primary use of the data, the DS-60 may also be used as evidence in the prosecution of any individual who makes a false statement on the application. Such false statements may entail violations of 18 U.S.C. sections 1001 and 1542, and/or 1621.

3. Due to legislated requirements and established regulations, a complete end-to-end electronic submission for this form is currently not an option. The DS-60 requires notarization by a passport agent, acceptance agent, or a notary public. We therefore need the original documentation to conduct a forensic analysis to ensure there is no fraud involved and to confirm the identity of the applicant. However, in an effort to facilitate customers' completion of the form, it is posted on the Department's website, www.travel.state.gov, where it can be filled out on-line and printed for submission. Efforts will also continue to investigate, test, and deploy more complete electronic options, while continuing to meet legislated requirements.
4. Aside from necessary basic self-identification data, the information requested does not duplicate information otherwise available. The DS-60 is the sole Department of State form used by passport applicants who need to establish a change in their legal name that was not obtained through court order or marriage.
5. The collection of information does not involve small businesses or other small entities.
6. The information collected on the DS-60 is crucial to establishing the identity and legal name of the passport applicant and resolving suspected fraud cases.
7. No special circumstances exist.
8. The 60-day Federal Register Notice soliciting public comment was published on April 30, 2014 (79 FR 24483), and closed June 30, 2014. The Department of State received no public comment in response to the 60-day notice in the *Federal Register*.
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 assurances of confidentiality other than those contained in federal statutes.
11. The DS-60 does not ask questions of a sensitive nature.
12. Passport Services estimates that the average time required for this information collection is 40 minutes per response. Therefore, the estimated total annual burden for the collection is:

183,037 (number of respondents) x 40 minutes / 60 = 122,025 hours

The estimated number of minutes per response is based on a sampling of the time required to search existing data sources, gather the necessary information, provide the information required, travel to a Notary Public and have the form notarized, make photocopies of the front and back side of the affiant's ID, review the final collection, and submit the collection for processing.

Passport Services conducted a sampling of the time required to complete the affiant's portion of the form through consultation with a small 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 15 minutes to 40 minutes to allow for travel time for the following:

- Documentation – Requires travel to a local county/city registrar's office and acquire required documentation;
- Proof of Identity - Percentage of applicants that will travel to a local business to make photocopies of their identification document; and
- Signature of Passport Agent, Acceptance Agent, or Notary Public for Certified Copies of Supporting Documentation – Requires travel to a notary public, passport agent, or acceptance agent.

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) x 1.4 (weighted wage multiplier) = **\$31.64** weighted wage

122,025 (annual hours) x \$31.64 (weighted wage) = **\$3,860,871** (hour burden cost)

13. To properly complete and submit a DS-60 Affidavit Regarding a Change of Name, an applicant must provide the following as specified in the "Purpose" section on page 1:

- Documentation - Acquired from the appropriate authorities or affiants;
- Proof of Name Change - Submit clear photocopies of the front and back side of documents showing use of name. (The estimated cost of a black and white copy is based on a quote from FedEx); and
- Signature of Passport Agent, Acceptance Agent, or notarial performed by a Notary Public for Certified Copies of Supporting Documentation – The signature of the Passport Agent or Acceptance Agent is done upon submission of the DS-60 form at a Passport Agency or Acceptance Facility. However, if the applicant (affiant) visits a Notary Public to certify the affidavit, they may be required to pay a notarization fee. The national average cost to have a document notarized is \$5.00. Since some respondents are expected to have access to cost-free notary services, we have assumed that 25% of respondents will incur a notarization fee.

There is no application fee associated with this collection. Form DS-60 is submitted in conjunction with form DS-11, Application for a U.S. Passport. When combining the estimated cost burdens associated with Form DS-60, the total annual cost burden for the percentage of applicants, outlined in the table below (0.50 and 0.25 probability of incurring a fee), is \$2,152,515. The respondent costs are due to the following:

Documentation of No Birth Record (183,037 total respondents)	x	\$ 10.00	=	\$1,830,370
Proof of Name Change - Black & White Copy (91,519 = 0.50 of total respondents/year)	x	\$ 1.02	=	\$93,349
Notary Service (45,759 = 0.25 of total respondents/year)	x	\$ 5.00	=	\$228,796
Total Cost to Respondents				\$2,152,515

14. The Department pays a contractor for materials and/or supplies purchase functions to produce the DS-60. 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 183,037 respondents per year for FYs 2015 – 2017 at a cost of \$15.00 per thousand, the contractor cost to the Federal Government is \$2,746.

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 specific forms (accept, review, and render a decision for each form). 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 (hence the 1.0 value assigned to the multiplier). 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-60 passport specialist adjudication cost is calculated as follows:

$[1.0 \text{ (adjudication time multiplier)} \times 183,037 \text{ (respondents)} / 21,765,378 \text{ (total weighted avg. of respondents, all PPT forms)}] \times \$82,165,237 \text{ (total passport specialist salary)} = \mathbf{\$690,973}$

Or using numbers only, $[(1.0 \times 183,037) / (21,765,378)] \times \$82,165,237 = \mathbf{\$690,973}$

With regard to the material costs (use of office supplies, printing, overhead, etc.) incurred by the passport specialist when adjudicating the DS-60, the Department has determined these costs to be negligible.

Therefore, the total cost to the Government is:

\$2,746 (contractor) + \$690,973 (passport specialist adjudication) = **\$693,719.**

15. Projections are based on information request letters sent to applicants that require the use of the DS-60. Two affidavits are required per applicant, and the table below illustrates the number of DS-60 forms completed; the number of passport applicants is half this amount.

The yearly projected numbers of respondents are based on demand forecast numbers from statistical models and historical trends of form usage. The primary driver for form usage is the demand forecast for each fiscal year. The next two fiscal years' forecasts are updated on an annual basis so that each forecast uses the most recent, relevant data to project future demand. Given the limits of statistical model forecasting, the demand projections beyond two fiscal years are considered guidance and are not supported by full statistical modeling. Given that projected passport application (DS-11) demand is the primary driver for form usage, the demand estimate used at the time of the previous submission (2011/2012) impact the difference between actual and proposed number of respondents. As shown in the Projections table below, the DS-60 use is expected to increase steadily in correlation with the DS-11 application estimate through FY 2017.

	Historical Form Usage		
Fiscal Year	2010	2011	2012
Total Passport Application Receipts (DS-11)	14,005,102	12,028,710	12,478,407
DS-60*	163,624	140,534	145,788
* Number of respondents (two DS-60 forms per passport applicant)			

	Projections				
Fiscal Year	FY13	FY14	FY15	FY16	FY17
Passport Applications (DS-11)	14,000,000	14,000,000	14,500,000	15,500,000	17,000,000
DS-60	163,566	163,566	169,406	181,090	198,614

The program changes associated with the submission of this collection now includes allowing sufficient travel time for the percentage of applicants traveling to the Notary Public, passport facility, and/or a local Fed Ex to acquire proper documentation and make copies of

their identification as outlined in detail in item 12 above. This has increased the burden time by 25 minutes.

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

- Page 1 Form – The instruction “Please Print Legibly Using Black Ink Only” has been inserted under the title of the form.
- Page 1 Form – In the first sentence in the Warning section the phrase “willfully in passport applications or in affidavits” has been replaced with “willfully on passport applications or on affidavits”
- Page 1 Form – In the first sentence in the Purpose section the phrase “An Affidavit Regarding a Change of Name must be submitted” has been replaced with “An affidavit Regarding a Change of Name may be submitted.”
- Page 1 Form – In the third sentence in the Purpose section the phrase “the applicant must present three or more public documents showing exclusive use of the name for at least five years.” has been replaced with “the applicant must present original or certified copies of three or more public documents evidencing that the applicant has used the acquired name generally for five years or longer.”
- Page 1 Form – In the fourth sentence in the Purpose section the phrase “all purposes” has been replaced with “generally” and commas have been added after “two persons” and “five years.”
- Page 1 Form – In the fifth sentence in the Purpose section the statement “front and back side of the affiant’s identification” has been replaced with “front and back of the affiant’s identification.”
- Page 1 Form – The #3 field “Number Of Years You Have Known The Applicant” has been eliminated and the subsequent fields have been renumbered accordingly.
- Page 1 Form – The heading on line #3 has been changed from Title to Suffix. .
- Page 1 Form – On the 1st line of the Swearing In section, the comma after the word belief has been replaced with a semi-colon.
- Page 1 Form – On the Identifying Document Submitted line of the Affiant section, the statement “Date of Issuance/Expiration” has been replaced with “Date of Issuance and Expiration.”
- Page 2 Form - The Privacy Act Statement has been revised and replaced.

16. Quantitative summaries of Department of State passport activities are published periodically on the Department of State website at www.travel.state.gov. Such summaries do not involve use of complex analytical techniques.
17. 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.