

# **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

## **REPATRIATION/EMERGENCY MEDICAL AND DIETARY ASSISTANCE LOAN APPLICATION**

**(OMB #1405-0150, Form DS-3072)**

### **A. JUSTIFICATION**

**1.** Emergency loans are issued to U.S. citizens abroad and their family members in several scenarios, two of which are to be covered by this form:

-- Repatriation loans for destitute U.S. citizens and their eligible family members who are outside the United States to provide for the citizen's and family's return to the United States;

-- Emergency medical and dietary assistance loans for United States citizens incarcerated abroad or destitute United States citizens abroad and their eligible family members who are unable to obtain such services otherwise;

[22 U.S.C. § 2670\(j\)](#) authorizes the Secretary of State to provide emergency medical assistance and dietary supplements, and other emergency assistance, to United States citizens incarcerated abroad or to destitute United States citizens abroad who are unable to obtain such services otherwise, such assistance is to be provided on a reimbursable basis to the extent feasible. Such assistance is referred to as Emergency Medical and Dietary Assistance (EMDA).

[22 U.S.C. § 2671](#) authorizes the Secretary of State to make expenditures for unforeseen emergencies. [22 U.S.C. § 2671\(b\)\(2\)\(B\)](#) provides that such emergency expenditures include loans made to destitute U.S. citizens who are outside of the United States for the purpose of their return to the United States. This is known as the repatriation loan program. [22 U.S.C. § 2671\(d\)](#) sets forth what the Secretary of State shall require in an application for a repatriation loan, collection procedures and passport limitations.

Department of State regulations pertaining to, *inter alia*, services to U.S. citizens in distress are published in 22 CFR Part 71.

**2.** The information collected in the DS-3072 is used to document the issuance of emergency loans provided in the contexts described above, to obtain a Privacy Act waiver to share information about the welfare of a citizen or lawful permanent resident with designated persons, and to facilitate debt collection.

3. The Department of State's Bureau of Consular Affairs (CA) created an electronic version of the DS-3072, presently available on the Department of State's website, allowing applicants to type their information into their loan request forms. The form must still be printed and signed by the applicant, and presented to the consular officer who will witness the signature and adjudicate issuance of the loan on behalf of the Department of State.

In connection with the electronic DS-3072, the Department is moving toward acceptance of electronic signatures in some circumstances. However, the Department does not yet accept electronic signatures on the form. To help prevent fraudulent applications, CA identified the following two categories of potential applicants:

(1) Applicants whose signature, photograph, and/or other biographical information is already on file with CA (i.e., on a previously submitted passport or visa application). For this category of applicants, the existing information will be used to verify the applicant's identity and loan eligibility; and

(2) Applicants whose information is not available for consular verification. Consular officers may require additional documentation from applicants in this category to verify identity and loan eligibility.

CA determined it is acceptable, when the Department is ready, to allow electronic signatures for applicants in the first category whose signature, photograph, and/or other biographical information is on file with CA and/or consular officers adjudicating loan applications overseas.

The Department of State's ability to accept electronic signatures from applicants the second category requires assessment. Within the next five months, CA anticipates it will complete the electronic signature acceptability assessment for the second category of applicants those whose information is not available for comparison and verification within CA.

In addition, CA will also assess the permissibility of accepting electronic signatures from consular officers in the field when adjudicating and, when applicable, approving evacuation loan applications on behalf of the Department of State.

Automated data collection, electronic signatures (when acceptable), and integrated systems capabilities will allow faster and more accurate information gathering, reduces the time necessary for consular officers to adjudicate a loan, improves the application process for private citizens, and increases the efficiency of debt collection. Internet technology will enable loan applicants to have quicker access to the forms and will offer the flexibility to complete the loan application form conveniently from any place in the world, a critical advantage in an emergency situation.

An online application will not supplant the physical DS-3072. In areas where internet access is unavailable or unreliable, if applicants do not have the level of technological

literacy to successfully submit an application online, or when other circumstances exist that make the use of the electronic form impracticable (e.g., situations in which a crisis has impacted the local internet and/or telecommunications infrastructure), the Department of State must provide applicants with the choice to use a paper application.

Until the second stage of the electronic DS-3072 is launched, applicants will continue to provide a paper copy of their application and supporting documentation to a consular officer for adjudication consistent with existing policies and procedures. Consular professionals will examine the documentation and coordinate with CA to ensure entry of the information into the pertinent Department of State electronic systems including the Consular Task Force system within the Consular Consolidated Database.

- 4.** The information in the DS-3072 is not duplicative of information maintained elsewhere or otherwise available.
- 5.** The information collection does not involve small businesses or other small entities.
- 6.** The DS-3072 is essential to providing a mechanism for issuance of repatriation and EMDA loans to eligible U.S. citizens and their eligible non-U.S. citizen family members. Providing emergency assistance to U.S. citizens overseas is a service which the Department has clear statutory authority to provide. If this information collection were not conducted, the consequences would include a considerable hardship to destitute U.S. citizens stranded in foreign countries.
- 7.** No special circumstances exist.
- 8.** The 60-day notice for the current OMB approval for this information collection was published in the Federal Register 80 FR 2770 on [Tuesday, January 20, 2015](#). The purpose of the Federal Register notice was to solicit comments from the public. No comments were received from the public.
- 9.** No payment or gift is provided to respondents.
- 10.** The DS-3072 informs applicants that the Department of State may release their information consistent with the provisions of the Privacy Act of 1974. The form also provides applicants the opportunity to designate additional persons to whom the Department of State may provide information.
- 11.** The Secretary of State is required by law at 2 U.S.C. § 2671(d)(1) to request both a verifiable address and Social Security number at the time of loan application. Applicants may not be eligible for the requested assistance if they do not provide the required information.
- 12.** The estimated hour burden of 482 hours per year is based on estimates that the DS-3072 form is completed by approximately 1,446 loan applicants per year, and only one response is permitted per applicant. Completion time for the form is estimated at 20 minutes. The information involves personal biographic data and the financial cost of

repatriation, emergency medical and dietary assistance in the foreign country or evacuation and does not require any special research.

#### **FY 2014**

Emergency Medical and Dietary Assistance for U.S. Citizens Abroad - 383  
Repatriation of Destitute U.S. Citizens – 1,290  
Total Respondents: 1,673

#### **FY 2013**

Emergency Medical and Dietary Assistance for U.S. Citizens Abroad - 129  
Repatriation of Destitute U.S. Citizens – 1,323  
Total Respondents: 1,452

#### **FY 2012**

Emergency Medical and Dietary Assistance for U.S. Citizens Abroad – 89  
Repatriation of Destitute U.S. Citizens – 1,125  
Total Respondents: 1,214

The annualized cost to all respondents for the hour burden for collections of information, based on appropriate wage rate categories, is \$15,067. The annualized cost to respondents for the hour burdens for collections of information, based on appropriate wage rate categories, was determined by figuring out the average hourly wage; \$22.33 is the average mean hourly civilian earnings. \$22.33/hr. was multiplied by 1.4 to get a weighted hourly wage of \$31.26/hr. \$31.26/hr. was then multiplied by 482 burden hours by the respondents. The final calculation equals \$15,067.

**13.** There are three costs associated with this application that respondents may incur. The first cost being the cost of a notary to notarize the form if executed by someone in the United States on behalf of the U.S. citizen/eligible foreign national facing an emergency abroad. The approximate cost to each respondent to have the form notarized in the U.S. is \$5. Second, the cost to the applicant who has to express mail the application to Washington D.C. (only in cases where the applicant is in the United States and the beneficiary minor or incompetent adult is abroad); or the applicant applying abroad who must send the application by express mail to the U.S. embassy/consulate handling the case. The third cost consists of the mileage travel costs for submitting the form to the U.S. diplomatic mission in person.

There are an estimated 135 loan applicants per year who pay a notary to notarize the form if executed by someone in the United States on behalf of the U.S. citizen/eligible foreign national facing an emergency abroad. By multiplying 135 applicants by the \$5 notary fee, the notary cost for all respondents combined is \$675.

The domestic costs for express mail averages \$18, and international express mail has an average cost of \$120. The average rates were based on data for FedEx express mail

shipments. Approximately 275 applicants send the form by express mail. The average total cost per applicant for both international and domestic express mail shipments is \$70. Multiply 275 applicants by \$70 and the total overall cost for express mail is \$19,250.

Mileage costs for traveling by car will vary based on how far the person has to travel. If the travel is ten miles, the overall total cost based on 386 respondents that drive is \$2,161. If the travel is 25 miles, the overall total cost based on 385 respondents is \$5,390. If the travel is 50 miles, the overall total cost based on 385 respondents is \$9,492. The grand total mileage cost is \$18,331 based on a total of 1,156 respondents that drove.

	Total # of Respondents	<b>1,446</b>		
	Total # of Respondents that Drove	<b>1,156</b>		
# of People	# of Miles	Reimbursement Cost Per Mile	Total Reimbursement for mileage listed for one person	Totals
386	10	\$0.56	\$5.60	\$2,161
385	25	\$0.56	\$14.00	\$5,390
385	50	\$0.56	\$28.00	\$10,780
				<b>\$18,331</b>

The estimated grand total cost for all respondents is \$38,256 (675 + 19,250 + 18,331).

There is no consular fee associated with this service.

**14.** The average cost to the federal government in projected compensation related to this service is \$39,633 (FY2015 (\$35,471) + FY2016 (\$36,619) + FY2017 (\$46,811) / 3 = \$39,633).

The basis of the projected fiscal numbers above are calculated by taking the unit cost for consular officer time (from the “Total Consular Charges” fee shown in the Consular Affairs Schedule of Fees) multiply it by the number of minutes OCS believes it takes someone to literally “process the form” and then multiply that fiscal number by the total number of approximate respondents to the form. Here’s the quantitative data used to calculate the average cost to the federal government projections:

	FY 15	FY 16	FY 17
<b>FSO Compensation</b>	\$19,509	\$20,140	\$25,746
<b>Consular</b>	\$177	\$183	\$234

<b>Agent Compensation</b>			
<b>WAE Compensation</b>	\$177	\$183	\$234
<b>All LES Compensation*</b>	\$5,675	\$5,859	\$7,490
<b>Domestic Compensation</b>	\$9,932	\$10,253	\$13,107
	<b>\$35,471</b>	<b>\$36,619</b>	<b>\$46,811</b>
<b>Amount of Time for Consular Officer to Review One Case</b>		15 minutes	
<b>Total Consular Charges for 1 Hour</b>		\$135	
<b>Total Cost to Review One Case</b>		\$33.75	

15. The number of respondents varies from year to year depending on the number of citizens in need. Major events that occur during any fiscal year can drastically enlarge the average number of responses received across all U.S. posts abroad. The higher burden hour numbers correspond to an increase in respondents.

The method for determining the cost to the government estimations has changed since the last iteration because the Consular Affairs Comptroller’s Office (CA/C) instructed us to do so.

16. General tabulations of information regarding applications for Repatriation and EMDA loans are maintained in the “Consular Package,” the Consular Workload Statistical System (CWSS) system. This contains raw data broken down by the Foreign Service post issuing the report. Until the debt is paid in full, records of emergency loans are maintained in the files of the Department of State, Passport Services, filed alphabetically by the name of the subject, the automated case record system of the Office of American Citizens Services and Crisis Management, and the Bureau of the Comptroller and Global Financial Services, Accounts Receivable Branch.

17. The OMB expiration date will be displayed.

18. No exceptions are requested.

**B. STATISTICAL METHODS**

This collection does not employ statistical methods.