

**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 U.S. 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 laws, as well as the implementing regulations at 22 C.F.R. Parts 50 and 51. Authority to collect the respondent’s Social Security number is also in 26 USC 6039E and 22 U.S.C 2714a(f) (see also paragraph 11, below). 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.

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 (including all applicants under the age of 16) must appear in person to execute their passport application. The form is 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. 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, applicants under the age of 16, and other 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).
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 passport and for establishing the applicant's entitlement to a U.S. passport.
7. No such special circumstances exist.
8. The Department of State published a 60-day notice in the *Federal Register* to solicit public comments on April 4, 2016 (81 FR 19285). No comments were received.
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.
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 to help confirm the applicant's identity. The applicant's identity must be established before a passport can be issued. Moreover, passport applicants are required to submit their Social Security

numbers with the passport application and failure to provide a Social Security number may result in the denial of an application (consistent with 22 U.S.C 2714a(f)) and may subject the applicant to a penalty enforced by the Internal Revenue Service. (26 U.S.C. 6039E)

12. Passport Services estimates that the average time required for this information collection is 1 hour and 25 minutes or 85 minutes per response. Therefore the estimated total annual burden for the collection is:

11,763,831 (number of respondents) x 85 (minutes) / 60 = 16,665,427 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) x 1.4 (weighted wage multiplier) = **\$31.64** weighted wage

16,665,427 (annual hours) x \$31.64 (weighted wage) = **\$527,294,110** (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 Department of State employees to validate the time.

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 U.S. citizenship/nationality - submit a photocopy of the front and (back if there is printed information) of U.S. citizenship evidence. (The estimated cost of a black and white copy is based on a quote from FedEx Office.)
  - 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. (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.

The Department estimates that the 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 \$0.54 mile for privately owned vehicles (POV) use as of January 1, 2016.

([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)).

11,763,831 (number of respondents) x 6 (miles) x \$0.54 (miles) = **\$38,114,812**.

When combining all of the individual estimated cost burdens associated with Form DS-11, the total annual cost burden for approximately 11,763,831 applicants is \$163,517,251.

A complete breakdown of the involved costs is outlined below.

Proof of Citizenship - Black and White Copy (1) 11,763,831	X	\$ 0.22	=	\$ 2,588,043
Proof of Identity - Black & White Copy 11,763,831 (2 @ \$0.22 each)	X	\$ 0.44	=	\$ 5,176,086
Passport Photo (1) 11,763,831	X	\$10.00	=	\$ 117,638,310
Average Travel Cost 11,763,831 X 6	X	\$0.54	=	<b>\$38,114,812</b>
<b>Total Cost to Respondent</b>				<b>\$163,517,251</b>

#### 14. Annualized Cost Analysis

**a. Total Cost to Program** \$ 1,294,021,410

##### **Government Cost Analysis**

The estimated cost to the government, which is funded by DOS fee collections, is calculated by multiplying the estimated number of respondents (11,763,831) x the fee charge for the collection (\$110). The cost includes the full cost to the government for first time passport application, processing, and production. This cost includes the cost of producing the DS-11 form. It also includes the suggested hourly rate for clerical, officer and managerial time with benefits, plus a percent for the estimated overhead cost for printing, stocking and distributing and processing of this form.

15. The hour burden adjustments indicated reflect an increase in the number of projected respondents from 10,351,043 (previous FYs 2013 – 2016) to 11,763,831 (FYs 2016-2018). Using the actual historical application count for FY 2012-2014, the average total amounted to 8,274,749. While demand decreased slightly in 2011, it began to rise again in 2012, 2013 and 2014. 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 projected for FYs 2016 through 2018.

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 proofs of citizenship and identity.

The change in government costs reflects a change in reporting methodology. Previous calculations were based on parts of the passport application process closely related with the DS-11 form itself. The current method shows the entire cost of the service.

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

- Page 1 Instructions- Under the heading “Information, Questions, and Inquiries” the word “Inquiries” was removed. The heading now reads: “For Information and Questions”.
- Page 1 Instructions - U.S. Passport Card language was moved from instruction page #1 to instruction page #3.
- Page 1 Instructions - Under the section “What/Where to submit with this form:” the instructions were moved up and “Where to submit this form” was changed to “How to submit this form”.
- Page 1 Form - Under the section “What to Submit with this form”, for “Proof of U.S. Citizenship”, language regarding the citizenship photocopy requirement was added as well as an explanation of the policy to keep lawful permanent resident cards once an applicant has been adjudicated as a U.S. citizen. It reads: *Evidence of U.S. Citizenship AND a photocopy of the front (and back, if there is printed information) must be submitted with your passport application. The photocopy must be on 8 ½ inch by 11 inch paper, black and white ink, legible, and clear. Evidence of U.S. citizenship that is not damaged, altered or forged will be returned to you. **Note:** lawful permanent resident cards submitted with this application will be forwarded to U.S. Citizenship and Immigration Services if we determine that you are a U.S. citizen.*
- The sentence “See page 2 of the instructions for detailed information on the completion and submission of this form” has been revised to now read “Follow the instructions on Page 2 for detailed information to complete and submit this form”.
- Page 1 Instructions - Under the heading “Special Requirements for Children”, the word, “Special” was removed. The heading now reads: “Requirements for Children”

- Page 1 Instructions - Added a new heading, “Passport Validity Length” and moved language about length of passport validity for minors and adults to instruction page #1 from instruction page #2.
- Page 1 Instructions - Under the heading “Important Notice to Applicants who have had a previous U.S. Passport Book and/or Passport Card”, the word “Important Notice” was removed and the language in the section Lost/Stolen was edited to avoid duplicate DS-64 submissions. The last sentence of the “In my Possession” language regarding visa pages was dropped due to the impending rollout of the Next Generation Passport.
- Page 2 Instructions - All fonts were made bigger and headings centered for consistency with all other instruction pages.
- Page 2 Instructions - In the heading “Proof Of Citizenship”, the language regarding multiple mailings was moved to instruction page #3 under “Note Regarding Mailing of your Passport(s)”.
- Page 2 Instructions - Under the heading “Color Photograph”, the paragraph was edited to be consistent with the travel.state.gov requirements. The sentence now reads: “The photograph must be taken with a neutral expression (preferred) or a natural smile, with both eyes open, and be printed on photo quality paper with a plain light (white or off-white) background”. Added that “handheld self-portraits” are unacceptable. The Policy language regarding hats or head covering was updated to indicate that as part of recognized, traditional religious attire, hats or head covering must be worn continuously when in public or a signed doctor’s statement is submitted verifying the item is used daily for medical purposes. Also, reference to “dark glasses” has been removed and a sentence was added to read “Glasses or other eyewear are not acceptable unless you provide a signed statement from a doctor explaining why you cannot remove them due to medical reasons (e.g., during the recovery period from eye surgery)”.
- Page 2 Instructions - Under the heading “Fees” in the section for faster processing, added that Expedited Service is available in the United States and Canada. In the first bullet, the sentence was changed from “the passport processing, expedite, and security fees may be paid in any of the following forms...” to read “the passport

application fee, security surcharge, and expedite fees” so that the fees are described the same way on the form that they are in the schedule of fees.

- Page 3 Instructions - Under the heading “Note Regarding Mailing”, the heading has been revised to read “Note Regarding Mailing of your Passport(s)”. Language was added stating that the Department will mail a U.S. passport to an address in Canada.
- Page 3 & 4 Instructions- Federal Tax Law & Privacy Act Statement sections have been revised to comply with the FAST Act requirement that applicants provide their social security number on the application form.
- Page 3 Instructions - The section with the heading “Protect Yourself Against Identity Theft!” was re-formatted to allow for more space and consistency with the rest of the sections. References to additional visa pages were removed per upcoming implementation of new policy.
- Page 4 Instructions - PRA statement was updated to include the new office and address.
- Page 1 of Form - The number of pages for a standard and non-standard passport book was updated to remove the number of pages in each passport in anticipation of the upcoming design change for the new U.S. passport. The newly designed passport books will have fewer pages than the current version. Also the barcode on the bottom right was updated to reflect when the DS-11 form was changed.

The Department estimates that these changes will not result in an increase in the current burden time of 85 minutes.

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.

