

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
U.S. Passport Renewal Application for Eligible Individuals
OMB #1405-0020 (Form DS-82)**

A. JUSTIFICATION

1. The Application for a U.S. Passport by Mail (Form DS-82) is used by eligible citizens and non-citizen nationals (hereinafter, collectively referred to as “nationals”) of the United States who need to renew their current or recently expired U.S. passport (a travel document attesting to one’s identity and U.S. nationality).

The DS-82 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).

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 14th 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 by Mail are at 22 C.F.R. 51.20 and 51.21.

2. The information collected on the DS-82 is used primarily to facilitate the issuance of U.S. passports to U.S. nationals. The primary purpose for soliciting the information is to establish nationality, identity, and entitlement to the issuance of a U.S. passport, and to properly administer and enforce the laws pertaining to the issuance thereof.

The DS-82 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-82 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-82 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. In an effort to provide customers with an electronic option to this paper-based form, the DS-82 is currently posted on the Department's website at <http://www.travel.state.gov> where applicants can fill out forms on-line and print them for submission. With the completed application, a 2-D Barcode will print on each application. This barcode will be scanned by Passport Services and automatically record the applicant's information in the system. This process will save both Passport Services and the applicant time and reduce errors.

In pursuit of the goals of the Government Paperwork Elimination Act and Executive Order 13571, The Department is currently working with numerous stakeholders (Consular Systems and Technology, Pay.gov, Fraud Prevention Program, Diplomatic Security (DS), and others) to develop a live electronic DS-82 submission. The Department's goal is to have a completely functional Online Passport renewal electronic application available to the public by 2017.

4. Aside from necessary basic self-identification data, the information requested does not duplicate information otherwise available. The DS-82 is the Department of State form used by those U.S. nationals who meet the qualifications to apply for a U.S. passport book and/or passport card renewal.
5. This collection of information does not significantly impact small businesses or other small entities.
6. The information collected on the DS-82 is crucial for documenting a U.S. national'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 May 17, 2016 (81 FR 30599). 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-82 does not ask questions of a sensitive nature. The DS-82 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 40 minutes per response. Therefore, the total estimated annual burden for the collection is:

$$7,261,667 \text{ (number of respondents)} \times 40 \text{ (minutes)} / 60 \text{ hour} = \mathbf{4,841,111} \text{ hours per year.}$$

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

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

$$4,841,111 \text{ (annual hours)} \times \text{\$31.64 (weighted wage)} = \mathbf{\text{\$153,172,752 (hour burden cost).}}$$

Estimates on the time and cost burden associated with this form were acquired through consultations with a small group of actual respondents.

13. To properly complete and submit a DS-82 passport application, an applicant must provide 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-82 applications are submitted by mail and are accepted in-person. Per information received from the United States Postal Service, the cost burden for postage is approximately \$1.25 per application. According to the Department, the majority of respondents mail their DS-82 application through their local USPS, 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 automobiles (POA) 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

Therefore, the cost to the respondents to travel this distance is estimated to be approximately **\\$23,527,801**.

$$7,261,667 \text{ (number of respondents)} \times 6 \text{ (miles)} \times \text{\$0.54 (miles)} = \mathbf{\text{\$23,527,801.}}$$

When combining all of the individual estimated cost burdens associated with Form DS-82, the total annual cost burden for approximately 7,261,667 applicants is \$105,221,599.

A complete breakdown of the involved costs is outlined below.

Therefore, the total cost to the respondents is as follows:

7,261,667	(1)Passport Photo	X	\\$10.00	=	\$72,616,670
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7,261,667 (1)Postage	X	\$1.25	=	\$9,077,084
7,261,667 x 6 miles – Average Travel Cost	X	\$0.54	=	\$23,527,801
Total Cost to Respondent			=	\$105,221,555

14. Annualized Cost Analysis

a. **Total Cost to Program \$7,987,833**

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 (7,261,667) 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 4,215,761 (FYs 2013 – 2016) to 7,261,667 (FYs 2016 - 2018). The demand has continued to increase at a steady rate between 2013-2016. The annual number of respondents projected to use the DS-82 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. The only costs attributed to the respondent in this submission are the costs of providing a passport photograph, postage and travel.

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 2 Instructions- Under the heading “The Current Passport Fee” in the section “Overnight Delivery Service,” the Department changed the sentence

from “If you desire overnight delivery service for the return of your U.S. passport, please include the appropriate fee with your application” to read: “Overnight Delivery Service, is only available for passport book (and not passport card) mailings in the United States. Please include the appropriate fee with your application”.

- Page 2 Instructions-For faster processing, the Department added that Expedited Service is available in the United States and Canada.
- Page 2 Instructions- Under the heading “Recent, Color Photograph”, the Policy language regarding hats or head coverings was updated to indicate that passport photos may include hats or head coverings only when they are worn continuously as part of recognized, traditional religious attire, or when the hat or head covering is worn for medical purposes as stated by a doctor in a signed statement. 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 from eye surgery)”.
- Page 3 & 4 Instructions- Federal Tax Law & Privacy Act Statement sections have been revised to comply with the FAST Act requirement, in which requires applicants to provide their Social Security number on the application form.
- Page 4 Instructions- Paperwork Reduction Act Statement was updated to include the new office and address: Passport Forms officer, U.S. Department of State, CA/PPT/S/L, 44132 Mercure Cir, P.O. Box 1227, Sterling, VA 20166-1227.
- Pages 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.
- Page 1 of Form-The e-mail address field, line item 6, was updated to encourage respondents to sign up for info alerts at www.travel.state.gov.
- In section at the bottom of the page after “Stop! You have completed your application be sure to sign and date page one”, we added instructions under the heading of “Where do I mail this application?”. As instruction pages often become separated from the actual application form page, this will assist applicants in determining where to mail the application form.

Additional questions that were initially proposed in the 60 day draft of the DS-82 form were removed from the proposed 30 day draft submitted for OMB approval. The Department made this decision to minimize intake disruption and ensure smooth technological transition.

The Department estimates that these changes will not result in a change in the current burden time of 40 minutes.

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 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.