

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION**

Affidavit of Identifying Witness

OMB Number 1405- 0088

DS-0071

A. JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

The Affidavit of Identifying Witness (DS-0071) is used in conjunction with the Application for U.S. Passport (DS-0011). It is used by Passport Agents, Passport Acceptance Agents, and Consular Officers of the Department of State to collect information for the purpose of establishing the identity of a passport applicant who has not submitted adequate evidence of identity with his/her passport application. This affidavit is executed by a witness who affirms that he/she can identify the applicant.

22 U.S.C. § 211a, et seq.; Authority to grant, issue, and verify passports

Executive Order 11295--Rules governing the granting, issuing, and verifying of United States passports

22 C.F.R. Part 51, including 22 C.F.R. 51.24. Issuance of Passports.

2. *What business purpose is the information gathered going to be used for?*

The DS-0071 is issued by the Department of State and, when completed, is evidence of a passport applicant's identity. Lack of sufficient identity information may result in the denial of a passport application.

3. *Is this collection able to be completed electronically (e.g. through a website or application)?*

Form DS-0071 is only available at acceptance facilities, passport agencies, and U.S. embassies and consulates. This form must be completed and signed in the presence of an authorized Passport Agent, Acceptance Agent, or Consular Officer.

4. *Does this collection duplicate any other collection of information?*

The DS-0071 is the sole Department of State form that is used when a passport applicant cannot furnish sufficient evidence of identity and seeks to submit a statement of an identifying witness in support of the application.

5. *Describe any impacts on small business.*

The collection of information does not involve small businesses or other small entities.

6. *What are consequences if this collection is not done?*

If the information solicited in the DS-0071 were not collected, passport applicants who lack sufficient evidence of identity (such as government issued photo IDs) would be unable to establish their identities, and would be unable to obtain U.S. passports.

7. *Are there any special collection circumstances?*

No such special circumstances exist.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

The Department of State published a 60-day notice in the *Federal Register* to solicit public comments on December 28, 2018 (83 FR 67459). No comments were received.

9. *Are payments or gifts given to the respondents?*

This information collection does not provide any payment or gift to respondents.

10. *Describe assurances of privacy/confidentiality*

The Department provides no promises of confidentiality, other than those included in the Privacy Act and other federal statutes. This form includes a Privacy Act Statement explaining the routine use exceptions to the Act.

11. *Are any questions of a sensitive nature asked?*

The DS-0071 asks the witness to provide a Social Security number if one is available, and if he/she wishes to disclose it. The DS-0071 is used in rare circumstances when an applicant does not submit sufficient identity evidence for passport issuance. By obtaining the witness' Social Security number, the Department of State can use the databases at its disposal to assist in assessing the credibility and identity of the witness.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*

Passport Services estimates that the average time required for this information collection is fifteen minutes per response. This includes five minutes to complete their portion of the form, since the respondent is only responsible for half of the fields (the other half are completed by a Passport Agent, Acceptance Agent, or Consular Officer), and 10 minutes for travel time to the acceptance facility. The Department estimates (based off of similar assumptions to the travel burden calculated as a part of the DS-11) that the majority of respondents accompany the applicant, who submits 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.

It has also determined, through a time and motion study, that 0.44% of DS-11s have a DS-0071 associated with it. The projected number of DS-11s are:

DS-11	
FY 18	11,200,000
FY 19	12,200,000
FY 20	11,100,000

Therefore, the estimated total annual time burden for the collection is:

11,500,000 (average number of DS-11 respondents FY18 – FY20) x 0.0044 = 50,600

50,600 number of respondents x 15 (minutes) / 60 = **12,650** hours per year

The sampling was completed through consultation with a small group of employees of the Department’s Bureau of Consular Affairs to validate the time.

The estimated cost to respondents is based on the civilian hourly wage from the Bureau of Labor Statistics website multiplied by the annual time burden (12,650 hours). The average wage is estimated to be \$24.91. The Department used the Employer Costs for Employee Compensation released by the Bureau of Labor Statistics in 2019.ⁱ

\$24.91 hourly rate x 12,650 hours responses = \$315,111.50 hour cost burden

13. Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.

The respondent must submit with the form a photocopy (front and back) of valid photo identification. The estimated cost of a black and white copy is based on a quote from Staples.¹

The Department estimates that the majority of respondents accompany the applicant, who submits 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. To determine the travel cost to the respondent, the Department is factoring in the General Services Administration (GSA) reimbursement rate of \$0.58 per mile for privately owned vehicles (POV).²

Proof of Identity - Black & White Copy (2-sided) 50,600 (2 @ \$0.11 each)	X	\$ 0.22	=	\$ 11,132
Average Travel Cost 50,600 X 6	X	\$ 0.58	=	\$ 176,088
Total Cost to Respondent				\$ 187,220

14. Describe the cost incurred by the Federal Government to complete this collection.

To calculate the cost to the federal government, we take into account the hourly wage for a FY 2019 domestic Civil Service GS-11 step 10 (the highest level of a passport adjudicator), which is \$33.05ⁱⁱ. Passports Services estimates that reviewing the DS-0071 requires 1 minute of a passport adjudicator’s time. Dividing \$33.05/hr. by 60 minutes yields a processing time cost of \$0.55 per minute. Multiplying the projected number of respondents (50,600) by \$0.55 yields \$27,830. This number is added to the cost to the Federal Government to print the forms.

We also take into account the cost to print the forms. (These forms are only available at an acceptance facility, passport agency, or embassy/consulate. The customer cannot print this

¹ Source: Staples, “Print and Marketing Services,” <https://www.staples.com/sbd/content/copyandprint/copiesanddocuments.html>.

² Source: General Services Administration, “Privately Owned Vehicles (POV) Mileage Reimbursement Rates,” <https://www.gsa.gov/travel/plan-book/transportation-airfare-rates-pov-rates/privately-owned-vehicle-pov-mileage-reimbursement-rates>.

form at home). The current cost is \$29.51 per 1000 forms.ⁱⁱⁱ Multiplying this unit price by 50.6 (the number needed to get to 50,600 forms) yields \$1,493.21.

Cost to Print the form	\$29.51 x 50.6	=	\$1,493.21
Time and Expense to adjudicate form	50,600 x \$0.55	=	\$27,830.00
Total Cost to Federal Government			\$29,323.21

15. Explain any changes/adjustments to this collection since the previous submission

The program change reflects a decrease in respondents’ use of this form from 61,000 in 2015 to 50,600 (annual average projected for FY 18 – 20). This decrease may be attributed in part to the greater availability of public records online which the Department may search and use to corroborate an applicant’s identity, reducing the need for an identifying witness to complete a DS-0071.

Changes to the estimates to cost burden to respondents and the cost of burdened time to respondents were due to adjustments in the overall assumptions associated with responding to this collection.

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

- a. Under the “For Acceptance Agent’s Use only” section, “Passport Applicant’s Identification” has been removed. Since the form has to be submitted in conjunction with a DS-0011 (on which the passport applicant’s identification is already notated), it was deemed unnecessary to also note it on the DS-0071.
- b. The new office and address was updated on the PRA statement.

16. Specify if the data gathered by this collection will be published.

The data gathered in this collection of information will not be published.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.

Expiration date for OMB approval will be displayed.

18. Explain any exceptions to the OMB certification statement below.

No exceptions to the OMB certification statement are being requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

ⁱ Source: Bureau of Labor Statistics, “Employer Costs for Employee Compensation – December 2018,”
<https://www.bls.gov/news.release/ecec.toc.htm>.

ⁱⁱ Source: Office of Personnel Management, “2019 General Schedule (GS) Locality Pay Tables,”
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/GS_h.aspx

ⁱⁱⁱ Source: Passport forms printing contractor Occam Solutions