

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Application for a U.S. Passport

OMB #1405-0004 (DS-11)

A. JUSTIFICATION

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

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 14th Amendment to the Constitution of the United States, and 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 through 51.28.

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

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

The DS-11 is currently available online at 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 online 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. *Does this collection duplicate any other collection of information?*

Aside from necessary basic self-identification data, the information requested does not duplicate information available elsewhere. The DS-11 is 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. *Describe any impacts on small business.*

This collection of information does not significantly impact small businesses or other small entities.

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

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. *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*

On May 28, 2019, the Department of State published a 60-day notice in the *Federal Register* to solicit public comments. 84 FR 24590. One comment was received through email at PPTFormsOfficer@state.gov. The Department has reviewed the questions on form DS-11 and has found that they are essential to proving identity and preventing fraud.

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*

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

The DS-11 collects personally identifiable information from the applicant necessary to establish nationality, identity, and entitlement to the issuance of a United States passport. The DS-11 requires a photograph from the applicant, which conveys biometric data required to validate the respondent's identity. 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. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection.*

The estimated number of respondents for this collection was calculated by taking the average number of projected respondents for the next three years.

	DS-11s
FY 2019	10,600,000
FY 2020	11,200,000
FY 2021	11,245,000
Average	11,015,000

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

11,015,000 (number of respondents) x 85 (minutes) / 60 = **15,604,583 hours per year.**

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.

The estimated cost to respondents is based on the civilian hourly wage rate from the Bureau of Labor Statistics website multiplied by the annual time burden (15,604,583 hours). The wage rate is \$25.22. The Department used the Employer Costs for Employee Compensation released by the Bureau of Labor Statistics in 2019.¹

$\$25.22 \text{ hourly rate} \times 15,604,583 \text{ hours} = \mathbf{\$393,547,583.26 \text{ hour cost burden}}$

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

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 Staples².
- 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 Staples.³
- Submit a photograph that meets criteria specified in the instruction pages. The estimated cost of photographs is based on the average price of Walgreens⁴, CVS⁵, and the United States Postal Service.⁶

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. The

¹ Source: Bureau of Labor Statistics, "Employer Costs for Employee Compensation – December 2018," <https://www.bls.gov/news.release/ecec.toc.htm>.

²Source: Staples, "Print and Marketing Services," <https://www.staples.com/sbd/content/copyandprint/copiesanddocuments.html>.

³ Source: Staples, "Print and Marketing Services," <https://www.staples.com/sbd/content/copyandprint/copiesanddocuments.html>.

⁴ Source: Walgreens, "Passport Photos," <https://photo.walgreens.com/store/passport-photos>.

⁵ Source: CVS, "Passport Photos," <https://www.cvs.com/photo/passport-photos>.

⁶ Source: Directly witnessed by Department employees during visits to USPS locations and when USPS takes passport photos at acceptance events.

Department has no way to calculate the average that distance overseas applicants travel to execute the DS-11s.

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).⁷

11,015,000 (number of respondents) x 6 (miles) x \$0.58 (miles) = \$38,332,200.

When combining all of the individual estimated cost burdens associated with Form DS-11, the total annual cost burden for approximately 11,015,000 applicants is **\$207,192,150**.

A complete breakdown of the involved costs is outlined below.

Proof of Citizenship - Black and White Copy (1) 11,015,000	X	\$ 0.11	=	\$ 1,211,650
Proof of Identity - Black & White Copy 11,015,000 (2 @ \$0.11 each)	X	\$ 0.22	=	\$ 2,423,300
Passport Photo (1) 11,015,000	X	\$15.00	=	\$ 165,225,000
Average Travel Cost 11,015,000 X 6	X	\$ 0.58	=	\$ 38,332,200
Total Cost to Respondent				\$ 207,192,150

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

Total Cost to Program: \$1,211,651,590

The estimated cost to the government, which is funded by Department of State fee collections, is calculated by multiplying the estimated number of respondents (11,015,000) 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.

11,015,000 (number of respondents) x \$110 (charge for collection) = **\$1,211,650,000**

This number is added to the cost to the Federal Government to publish the Federal Register Notices (FRNs). The estimated amount to publish one Federal Register Notice (FRN) is \$795. A 60-day FRN and 30-day FRN is published for each form with a total cost to the Federal Government of **\$1,590**.

⁷ 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>.

\$1,211,650,000 + \$1,590 (cost of publishing two FRNs) = \$1,211,651,590

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

The hour burden adjustments indicated reflect a decrease in the number of projected respondents from 11,763,831 (previously projected for FY 2016 – 2018) to 11,015,000 (FY 2019-2021). Using the actual historical application count for FY 2016-2018, the average total DS-11 receipts amounted to 10,433,283. 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 increases in average cost for photographs (up to \$15.00 from \$10.00 previously) and in POV reimbursement rates (\$.58/mile currently vs. \$0.54/mile previously).

The change in government costs reflects the decrease in the number of projected respondents. The cost of service (\$110) has not changed since the last submission.

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

- Page 1 Instructions – Information about requirements was moved to page 1. More bulleted lists were used to make easier to read.
- Page 1 Instructions – Omitted “...your signature and...” Reason: Some acceptable IDs do not carry a signature.
- Page 1 Instructions – Added section for applicants 16-17 to reflect upcoming one-parent consent policy.
- Page 1 Instructions - Section “What to Submit with This Application” - Removed "to the satisfaction of the acceptance agent" and changed “Passport Services” to “the Department.”
- Page 1 Instructions – Section “Children Under 16” - Added "(Example: a birth certificate or consular report of birth abroad listing the names of the parent(s)/guardian(s) and child)

- Page 1 Instructions – Section “What to Submit with This Application,” subsection “Fees” - Changed “embassy or consulate” to “embassy, consulate, or consular agency.”
- Page 2 Instructions – Section “How to Submit” - Replaced “[...] a U.S. Embassy or Consulate (if abroad)” with “[...] a U.S. embassy, consulate, or consular agency (if abroad).”
- Page 2 Instructions – Section “Applicants Born Outside the U.S.” - Under “applicants born outside the United States,” naturalization of parents – changed third bullet to “Evidence of your admission to the United States for legal permanent residence status and proof you subsequently resided in the United States.”
- Page 2 Instructions – Section “Applicants Born Outside the U.S.” subsection “Adoption” - added a bullet requesting “Evidence you have resided in the United States.”
- Page 2 Instructions – Section “Applicants Born Outside the United States” – Correct date from 02/28/1983 to 10/05/1978.
- Page 3 Instructions – Changed heading of “Note Regarding Mailing of your Passport” to “Information on How You Will receive Your Passport(s).” Updated language.
- Page 3 Instructions – Combined sections “Notice to customers Applying Outside a Department of State Facility” and “Fee Remittance,” titled the new section “How Fees Are Established and Processed.”
- Page 3 Instructions – Provided more information in “Lost or Stolen Passport” section.
- Page 3 Instructions – Changed title of “Notice to U.S. Passport Card Applicants” section to “What is the Difference Between a Passport Book and a Passport Card.”

- Page 3 Instructions – Added “Service” to section title about no-fee passports.
Changed to: “Notice to Applicants for No-Fee Regular, Service, Official, or Diplomatic Passports.”
- Page 4 Instructions – Moved “Warning” to page 4.
- Page 4 Instructions – Deleted separate “Use of Social Security Number” section and added the content to “Federal Tax Law.”
- Page 4 Instructions – PRA statement was updated to include the new office and address.
- Page 4 Instructions – Deleted section “Electronic Passport Statement.”
- Page 1 Application – Under form title – changed language to “Use black ink only. If you make an error, complete a new form. Do not correct.”
- Page 1 Application – Text above Passport product check boxes (top of form) – Removed “Attention: Please read warning.”
- Page 1 Application – Text above Passport product check boxes (top of form) – Replaced “Please select document(s) for which you are applying” with “Select document(s) for which you are submitting fees.”
- Page 1 Application – Top right corner, under barcode box – Replaced check box “Dep” with “S.” Deleted DOTS. Added NFR check box.
- Page 1 Application – Field #8 – Added "If applicant is a child, please write 'In Care Of' the parent".
- Page 1 Application – Acceptance Agent Section – Reordered the lines for Facility Name, Acceptance Agent signature, and Name of courier Company.
- Page 1 Application – Acceptance Agent Section - Added word "Print" to "facility/location name" and "courier company name" lines to encourage printing.

- Page 1 Application – Acceptance Agent Section – Added an oath under the Acceptance Agent Signature line.
- Page 1 Application – Acceptance Agent Section – Replaced “Name of Courier Company (if applicable)” with “Courier company or third party hand-carrying application (if applicable).”
- Page 2 Application – Field #10 – Added "(at Parent's Birth)" after “Parent - First and Middle”
- Page 2 Application – Field #10 – Next to Place of Birth, added “(City & State if in the U.S., or City & Country as it is presently known).”
- Page 2 Application – Field #18– Added "(if no travel plans, please write "none")."
- Page 2 Application – Field #19 – Reworded instructions
- Page 2 Application – Field #20 – Added "to applicant" in Relationship field
- Page 2 Application – Adjudication section – Added "sole parent" check box.
- Page 2 Application – Adjudication section – Changed "per PIERS" to "see #21"

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

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

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

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

The expiration date for OMB approval will be displayed.

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

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.