

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
Application for A, G, or NATO Visa
OMB Number 1405-0100**

DS-1648

A. JUSTIFICATION

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

This collection is necessary for the Department of State to collect information necessary to adjudicate applications for A, G, or NATO visas in the United States. Ambassadors, public ministers, diplomats, consular officers, foreign government officials, their immediate family members, and attendants, servants, and personal employees may apply for “A” nonimmigrant visas under section 101(a)(15)(A) of the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1101(a)(15)(A). Representatives of recognized foreign governments to international organizations and officers or employees of international organizations, as well as their immediate family members, attendants, servants or personal employees may apply for nonimmigrant G visas under INA § 101(a)(15)(G), 8 U.S.C. § 1101(a)(15)(G). As established under the Agreement on the Status of the North Atlantic Treaty Organization (NATO), National Representatives and International Staff; Agreement Between the Parties to the North Atlantic Treaty Regarding the Status of Their Forces; and the Protocol on the Status of International Military Headquarters Set Up Pursuant to the North Atlantic Treaty and as outlined in 22 C.F.R. § 41.25, the principal permanent representative of a member state to NATO, other representatives of member states to NATO, official clerical staff accompanying representatives and their immediate family members, attendants, servants and personal employees may apply for “NATO” visas to enter the United States.

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

The DS-1648 is used by applicants applying for an A-1, A-2, G-1, G-2, G-3, G-4, or NATO-1 through NATO-6 visa in the United States. Such applicants are already in the United States in A-1, A-2, G-1, G-2, G-3, G-4, or NATO-1 through NATO-6 nonimmigrant status. The information gathered in the DS-1648 is used to issue a new visa to facilitate their travel back to the United States following a temporary trip abroad. The Department currently employs the DS-160, which consular officers use to adjudicate most applications for a nonimmigrant visa; however, this form will be used instead of the DS-160 to adjudicate these specific cases, and the information requested on the form is limited to that which is necessary to determine the eligibility of applicants who apply for an A, G, or NATO visa in the United States.

Each year, approximately 30,000 A, G and NATO visa applications are processed in the United States, out of the approximately 150,000 A, G, and NATO visa applications submitted worldwide. This form is used exclusively by the approximately 30,000 visa applicants applying for one of those visas within the United States, and is therefore a more

accurate estimate than that used in previous submissions pertaining to this form, which used the total number of worldwide A, G, or NATO applications.

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

The DS-1648 is submitted electronically to the Department. Upon completion of the form, the applicant is instructed to print a confirmation page containing a bar coded record locator. The applicant will then include this confirmation page when transmitting his or her passport to the Department for visa issuance. The Department allows the applicant's organization to stamp and sign the confirmation page in lieu of providing a full diplomatic note; an original diplomatic note or other equivalent document (such as the stamped, signed confirmation page) is required for processing A and G visas.

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

This information collection solicits information from the applicant that is otherwise unavailable to the Department.

5. *Describe any impacts on small business.*

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

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

Applicants for A, G, or NATO visas, with the exception of A-3, G-5 and NATO-7 visas, must complete this form each time they apply for a subsequent A, G, or NATO visa within the United States. It is essential that up-to-date information be collected with each application, and it would not be feasible to collect the information through another existing form.

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 published a notice in the Federal Register on June 19, 2019 (84 FR 28610) soliciting public comments within a 60-day period. The Department did not receive any comments.

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

No payment or gift is made to the respondent.

10. *Describe assurances of privacy/confidentiality*

In accordance with section 222(f) of the INA, 8 U.S.C. 1202(f), information obtained from applicants in the nonimmigrant visa process is considered confidential and may be used only for the formulation, amendment, administration, or enforcement of the immigration, nationality, and other laws of the United States, except that, in the discretion of the Secretary of State, such information may be made available to a court or provided to a

foreign government if the relevant requirements stated in INA § 222(f), 8 U.S.C. § 1202(f), are satisfied.

11. Are any questions of a sensitive nature asked?

The form does not seek personal information of a sensitive nature.

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

Approximately 30,000 respondents complete this form each year, according to an estimate derived from averaging the responses for the past three fiscal years. Completing the entire form takes approximately 15 minutes. This time burden estimate from prior supporting statements is reduced from 30 minutes based upon a more accurate estimation of the average time it takes to fill this short and straightforward form. The annual hour burden estimate is 7,500 hours (30,000 x 15 minutes = 7,500 hours). The hour cost burden for this collection is \$463,725 based on the Bureau of Labor Statistics' average social scientists and related workers wage of \$41.22.¹ This is based on the calculation of \$41.22 (average hourly wage) x 1.5 (estimated weighted wage multiplier with employer benefits and overhead costs) x 7,500 hours = \$463,725. The Department cannot provide more accurate estimates of fully loaded wage rates for applicants given the variation from country to country where each applicant is employed.

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

Applicants are required to print the confirmation page with the bar code upon completion of their application. Printing one page in black and white costs approximately 5 cents. As a result, this collection will cost respondents approximately \$1,500 in total (30,000 applicants x \$0.05). In addition, officials are exempt from fees to submit a visa application per 22 C.F.R. § 41.107(c).

14. Describe the cost incurred by the federal government to complete this collection.

The DS-1648 is used by applicants seeking A, G, or NATO visas domestically in the United States. It is referenced as a “No-Fee” visa service in the cost of service model (CoSM) of the Bureau of Consular Affairs. According to the model, the total annual cost burden to the federal government for processing no-fee visas worldwide is \$30,925,841.54. The annual volume for all A, G, and NATO visa categories is 178,315, resulting in a per unit cost of \$173.43. These figures are the two-year weighted averages used in the latest Bureau-approved CoSM, which uses activity-based costing to estimate the cost of consular services using approved budget figures, as well as stakeholder and survey input to estimate processing times to allocate the correct amount of resources, including overhead, to each service.”

¹ Source: Data from the U.S. Bureau of Labor Statistics' May 2018 National Occupational Employment and Wage Estimates for social scientists and related workers (<https://www.bls.gov/oes>). Retrieved April 1, 2019. The BLS wage category “social scientists and related workers” was determined to be the best category to capture the population of government officials and politicians who will be the primary users of the DS-1648.

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

There are no changes or adjustments to this collection since the previous submission, other than the revised hour burden for applicants and the new estimated number of 30,000 respondents, which is a more accurate estimate than that in previous submissions.

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

A quantitative summary of all Department of State visa activities is published in the annual Report on the Visa Office. The Report of the Visa Office is an annual report providing statistical information on immigrant and non-immigrant visa issuances by consular offices, as well as information on the use of visa numbers in numerically limited categories. The Visa Office currently has annual reports available from 2000 to 2018. The website can be found [here](#).

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

The Department will display the OMB expiration date.

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

The Department is not requesting any exception to the certification.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.