

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
Application for a U.S. Passport: Corrections, Name Change Within
1 Year of Passport Issuance, and Limited Passport Holders
OMB Control Number #1405-0160 (Form DS-5504)**

A. JUSTIFICATION

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

The Application for a U.S. Passport: Corrections, Name Change Within 1 Year of Passport Issuance, And Limited Passport Holders (DS-5504) is the form used by current passport holders who need to re-apply for a passport, at no charge. The following categories are permitted to re-apply for a new passport using the DS-5504: a) the passport holder's name has changed within the first year of the issuance of the passport; b) the passport holder needs correction of descriptive information on the data page of the passport; c) the passport holder wishes to obtain a fully valid passport after obtaining a full-fee passport with a limited validity of two years or less.

Under 22 United States Code (U.S.C.) Section 211a et seq. and Executive Order 11295 (August 5, 1966), the Secretary of State has authority to issue U.S. passports to U.S. citizens and non-citizen nationals. When the bearer of a valid U.S. passport applies for a new passport book and/or passport card with corrected personal data or when the bearer of a limited validity passport applies for a fully-valid replacement passport, the Department must confirm the applicant's identity and eligibility to receive passport services before the Department can issue the corrected or replacement passport to the applicant. Form DS-5504 requests information that is necessary to determine whether the applicant is eligible to receive this service in accordance with the requirements of Title III of the Immigration and Nationality Act (INA) (U.S.C. sections 1401-1504), the regulations at 22 C.F.R. Parts 50 and 51, and other applicable authorities.

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

The information collected on the DS-5504 is used to facilitate the issuance of U.S. passports to U.S. citizens and 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-5504 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 reviewed 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 reviewed 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-5504 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 and the Department's System of Records Notice (SORN) for Passport Records (STATE-26) and Overseas Citizens Services Records and Other Overseas Records (STATE-05).

The DS-5504 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-5504 is currently available at travel.state.gov. However, the DS-5504 cannot be submitted electronically, because the current U.S. Passport and additional documentary evidence (i.e., proof of name change) are required to be submitted in person or by mail with this form. The form can be filled out online and printed for manual signature and submission. When the application is filled out online, a 2-D barcode is printed on each form. This barcode is scanned by Passport Services and automatically records the applicant's information in the system. 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 otherwise available. The DS-5504 is the sole Department of State form used by U.S. citizens and nationals who meet the qualifications to apply for a replacement passport.

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-5504 is crucial for documenting a U.S. citizen's request for a replacement passport and for establishing the applicant's entitlement to a replacement 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 August 1, 2019, the Department of State published a 60-day notice (84 FR 37707) in the *Federal Register* to solicit public comments. No comments were received on regulations.gov or through email at PPTFormsOfficer@state.gov.

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-5504 collection of information asks the respondent to provide a Social Security number in order to confirm the applicant's identity. Passport Services must confirm that the person applying for additional passport services is the same person to whom the U.S. passport was originally 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 P.L. 114-94) and may subject the applicant to a penalty enforced by the Internal Revenue Service. (26 U.S.C. 6039E, P.L. 114-94, Section 32101)

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-5504s
FY 2019	141,000
FY 2020	138,000
FY 2021	135,000
Average	138,000

Passport Services estimates that the average time required for this information collection is **40 minutes per response**. 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.

Therefore the estimated total annual burden for the collection is:

138,000 (respondents) x 40 (minutes)/60 hour = **92,000** hours/year.

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 (92,000 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

$\$25.22 \text{ hourly rate} \times 92,000 \text{ hours} = \mathbf{\$2,320,240 \text{ hour cost burden}}$

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

To properly complete and submit a DS-5504 passport application, an applicant must submit a photograph that meets criteria specified in the instruction pages. The estimated cost of photographs is based on the average price of \$15.00 from Walgreens², CVS³, and the United States Postal Service.⁴ DS-5504 applications are submitted by mail and are accepted in-person at Passport agencies and overseas. The Department strongly encourages applicants to mail in their applications via trackable mail, and the current price for a flat rate Priority Mail envelope is \$7.35⁵. 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 Department has no way to calculate the average that distance overseas applicants travel to submit the DS-5504s.

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).⁶

$138,000 \text{ (respondents)} \times 6 \text{ (miles)} \times \$0.58 \text{ (miles)} = \$480,240$

A complete breakdown of the involved costs is outlined below. Therefore, the total cost to the respondents is as follows:

¹ Source: Bureau of Labor Statistics, "Employer Costs for Employee Compensation – March 2019," https://www.bls.gov/news.release/archives/ecec_06182019.htm.

² Source: Walgreens, "Passport Photos," <https://photo.walgreens.com/store/passport-photos>.

³ Source: CVS, "Passport Photos," <https://www.cvs.com/photo/passport-photos>.

⁴ Source: Directly witnessed by Department employees during visits to USPS locations and when USPS takes passport photos at acceptance events.

⁵ Source: USPS, "Priority Mail," <https://www.usps.com/ship/priority-mail.htm>.

⁶ 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>.

138,000 (1) Passport Photo	X	\$15.00	=	\$2,070,000
138,000 (1) Postage	X	\$7.35	=	\$1,014,300
138,000 x 6 miles – Average Travel Cost	X	\$0.58	=	\$480,240
Total Cost to Respondent			=	\$3,564,540

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

The projected annual cost to the federal government for this collection is **\$377,295**. To calculate this, 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 \$33.52ⁱ. Passports Services estimates that reviewing the DS-5504 requires 4 minutes and 48 seconds (4.8 minutes) of a passport adjudicator's time. Dividing \$33.52/hr. by 60 minutes yields a processing time cost of \$0.56 per minute. Multiplying the processing time cost (\$0.56) by the amount of time it takes to adjudicate the DS-5504 (4.8 minutes) gives a total of \$2.69. Multiplying the projected number of respondents (138,000) by \$2.69 yields **\$371,220**.

We also take into account the cost to print the forms. The DS-5504 will be produced by a contractor with cost-plus-fixed-fee line items for materials and/or supplies purchase functions. The estimate provided to the Department by the contractor includes costs for contractor labor, supplies, equipment, printing materials, delivery, overhead, support staff, etc.

The current cost is \$32.50 per 1000 forms.ⁱⁱ Based on the projected number of 138,000 respondents per year for the next three years, at a cost of \$32.50 per thousand, the contractor printing cost to the Federal Government is **\$4,485**.

The estimated cost to the Federal Government is added to the cost to publish two Federal Register Notices (FRN). The estimated amount to publish one 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**.

Time and Expense to adjudicate form	138,000 x \$2.69	=	\$371,220
Cost to Print the form	\$32.50 x 138	=	\$ 4,485
Cost of Two Federal Register Notices	\$795 x 2	=	\$1,590
Total Cost to Federal Government			\$377,295

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

The program adjustments reflect a slight increase in the number of projected respondents from 136,833 (FYs 2016-2018) to 138,000 (FYs 2019-2021). The demand has leveled off in the last couple years after the surge in demand around 2017 and 2018. Using the actual historical application count for FY 2016-2018, the average total DS-5504 receipts amounted to 125,145 per year. 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), postage costs (\$7.35, up from \$1.25 previously) and in POV reimbursement rates (\$.58/mile currently vs. \$.54/mile previously).

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

Instruction Page 1 of 4

1. Page 1 Instructions – Reworded title for clarity:
“Application for a U.S. Passport **for Eligible Individuals** – Correction, Name Change **to Passport Issued One Year Ago or Less** ~~Within 1 Year Of Passport Issuance~~, and Limited Passport **Replacement Holders**”
2. Page 1 Instructions – Deleted “Please detach and retain this instruction sheet for your records,” “Mailing Date of Application,” and “Complete the checklist to determine your eligibility” from form header. They do not add value.
3. Page 1 Instructions – Section “Can I Use This Form” – Moved checkboxes to left side and reworded questions for clarity and plain language.
4. Page 1 Instructions and throughout entire form – Changed “U.S. passport book and/or U.S passport card” to “U.S. passport book and/or card”.
5. Page 1 Instructions – Section “Can I Use This Form” - Added blue background color, reworded for clarity/plain language, and added vanity url: travel.state.gov/passportforms to “If you answered no to any of the statements above, STOP [...]” section.
6. Page 1 Instructions – Section of text below “Can I Use This Form” – Passport card information was reworded for clarity and relocated to "What Is The Difference Between A Passport Book And Passport Card?" on instruction page 3 (wording and location mirrors forms DS-11 and DS-82).
7. Page 1 Instructions – Reworded for clarity and relocated website and customer contact information from “For Information and Questions” section to top of instruction page 1, below title.
8. Page 1 Instructions – Moved “Failure to provide information requested” to “Warning” section on instruction page 4.
9. Page 1 Instructions – “Notice To Applicants Residing Abroad” – Moved up on the page, created section header, and reworded for clarity and plain language.
10. Page 1 Instructions – “Warning” – Moved to top of instruction page 4.
11. Page 1 Instructions – “See page 2 of...” – deleted to create more space.

12. Page 1 Instructions and throughout the form – Changed “Passport Services” to “the Department of State” or “the Department.”

Instruction Page 2 of 4

13. Page 2 Instructions – Section “What Do I Send With this Application Form” – Changed title to “What To Submit With This Application” and rewrote bulleted list for clarity and plain language.
14. Page 2 Instructions – Section “What Do I Send With this Application Form” – Created headings for clarity: “A New Color Photograph” and “Additional Documents.”
15. Page 2 Instructions – Section “What Do I Send With this Application Form” – Rewrote guidance on photographs to match the DS-11 and DS-82.
16. Page 2 Instructions – Section “What Do I Send With this Application Form” – Created sub-headings for clarity: Name Change, Correction, Limited Passport Replacement
17. Page 2 Instructions – Section “What Do I Send With this Application Form” – Changed “documentary evidence” to “additional documents”
18. Page 2 Instructions – Section “What Do I Send With this Application Form” – Added vanity url: travel.state.gov/sexmarker for guidance on sex transition.
19. Page 2 Instructions – Changed heading “How Do I Apply Using This Form?” to “Where Do I Mail This Application?” and moved this section to instruction page 1.
20. Page 2 Instructions and throughout the form – Changed “recent photograph” to “new photograph.”
21. Page 2 Instructions – Rewrote for clarity and moved to instruction page 1: ~~Because of sensitivity of the enclosed documents, Passport Services~~ The Department recommends using trackable mailing service when submitting your application.
22. Page 2 Instructions – Changed title from “Is There A Fee Associated With This Form and How Will My New U.S. Passport Book And/Or Passport Card Be Mailed Back To Me?” to “Is There A Fee With This Application?” and moved to instruction page 1.
23. Page 2 Instructions – Section “Is There A Fee Associated With This Form and How Will My New U.S. Passport Book And/Or Passport Card Be Mailed Back To Me?” – Rewrote for clarity and moved instructions about separate mailings to “Information On How You Receive Your Passport(s)” at top of instruction page 3.
24. Page 2 Instructions – Rewrote for plain language and moved “Overnight Delivery” and “For Faster Processing” to “Where Do I Mail This Application?” on instruction page 1.
25. Page 2 Instructions – Rewrote for clarity and moved “Note Regarding Mailing Address”, “In Care Of” guidance, change of address guidance, and information on separate mailing and photocopy return to “Information On How You Receive Your Passport(s)” at top of instruction page 3.
26. Page 2 Instructions – Information on fees rewrote for clarity and moved to instruction page 1 under “Is There A Fee With This Application.”

Instruction Page 3 of 4

27. Page 3 Instructions – Combined “Notice To Customers Applying Outside A Department Of State Facility” section with “Fee Remittance” and renamed as “How Fees Are Established And Processed” located on instruction page 3. Reworded for clarity.
28. Page 3 Instructions – Changed title to include no-fee regular and service passports: “Notice to Applicants for No-Fee Regular, Service, Official, or Diplomatic Passports” and replaced text in all caps with underlined lowercase.
29. Page 3 Instructions – Combined section “Important Notice To Applicants Who Have Lost Or Had A Previous U.S. Passport Book and/or Passport Card Stolen” with “Protect Yourself Against Identity Theft! Report!” and renamed as “Protect Yourself Against Identity Theft – Report Your Passport Lost Or Stolen” on instruction page 3. Reworded for clarity and added “or non-citizen national” to “A United States citizen...”
30. Page 3 Instructions – Combined “Special Notice To U.S. Passport Card Applicants Only” with “What Is The Difference Between A Passport Book And Passport Card?” on instruction page 3 (wording and location mirrors forms DS-11 and DS-82).
31. Page 3 Instructions – “Federal Tax Law” moved to instruction page 4 and added “... your application may be denied...”
32. Page 3 Instructions – Combined “Use of Social Security Number” section with “Federal Tax Law” on instruction page 4.

Instruction Page 4 of 4

33. Page 4 Instructions – Section “Acts or Conditions” reworded for clarity: “...drug offense or convicted ~~for~~ of a “sex tourism” crimes statute...”
34. Page 4 Instructions – Updated “Paperwork Reduction Act Statement” to match other passport forms.
35. Page 4 Instructions – Deleted “Electronic Passport Statement.” The information is no longer new and is available on website, if needed.

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36. Page 1 Application – Reworded title for clarity: “Application for a U.S. Passport ~~for Eligible Individuals~~ – Correction, Name Change ~~to Passport Issued One Year Ago or Less Within 1 Year Of Passport Issuance~~, and Limited Passport ~~Replacement Holders~~”
37. Page 1 Application – Changed “Please print legibly using black ink only” to “Use black ink only. If you make an error, complete a new form. Do not correct.”
38. Page 1 Application – Deleted “Attention: Read WARNING on page 1 of instructions”
39. Page 1 Application – Changed “For more information see page 1 of instructions” to “(See instruction page 3)”
40. Page 1 Application – Reworded information on visa pages for clarity.

41. Page 1 Application – Field #6 – changed “(Info alerts offered at travel.state.gov)” to “(see application status at passportstatus.state.gov)” to promote self-service tool for customers.
42. Page 1 Application – Field #8 – Reworded for clarity and USPS Postal Addressing.
43. Page 1 Application – Updated page numbers in declaration above the signature line.
44. Page 1 Application – Increased font size for “Applicant’s Legal Signature” and “Date.”
45. Page 1 Application – Changed “PIERS” to “ACRQ.”

Page 2 of 2

46. Page 2 Application – Field #17 – Reworded for clarity and plain language.
47. Page 2 Application – Field #18 – Added “Your” to “Emergency Contact” and changed “Relationship” to “Relationship to Applicant.”
48. Page 2 Application – Field #19 - Added “(If no travel plans, please write "none").”
49. Page 2 Application – Under field #19 – Deleted “..regarding your current passport book and/or passport card” and added a blue background.
50. Page 2 Application – First and second section below field #19 – Reworded for clarity
51. Page 2 Application – Third section below field #19 – Replaced long web address with vanity url: travel.state.gov/sexmarker.
52. Page 2 Application and throughout the form – Changed “page 2 of the instructions” to “instruction page 2.”

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.

ⁱ 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

ⁱⁱ Source: Passport forms printing contractor Occam Solutions