

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
OMB Control Number 1405-0177 (SV 2012-0006)
Passport Demand Forecasting Study**

A. Justification

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

The United States border management community is tasked with the protection of the United States and its territories from foreign threats, the enforcement of immigration and customs laws, and the promotion of economic prosperity for the United States and our allies. The Department of State plays a vital role in this community through several offices, including its Bureau of Consular Affairs' Passport Services Directorate. Passport Services is primarily responsible for issuing U.S. Passports to U.S. Citizens and Nationals who apply and meet all requirements. Passport Services assists U.S. Citizens and Nationals intending to travel internationally by issuing passports and protecting the integrity of the U.S. Passport as proof of U.S. Citizenship at home and around the world. Section 7209 of the Intelligence Reform and Terrorism Prevention Act (IRTPA), enacted on December 17, 2004, called for the Secretary of Homeland Security (DHS), in consultation with the Secretary of State, to develop and implement a plan to require U.S. citizens and nationals to present a passport and/or other sufficient documentation of citizenship and identity when entering the United States. This resulted in an increase in the demand for U.S. passports. In fiscal year 2007, the United States experienced an unprecedented surge in passport applications, issuing over 18 million passports as a result of the Western Hemisphere Travel Initiative (WHTI). In fiscal year 2019, the Department of State eclipsed the 2007 numbers with over 20 million passports issued. Today, with new variables including the upcoming deadline for the REAL ID Act and the COVID-19 crisis, the ability to gather accurate statistical data to forecast the demand for passport books and passport cards is more critical than ever.

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

The objective of the statistical data and research is to estimate the overall demand for passport books and passport cards. Statistical data and information will aid Passport Services in developing demand projections monthly, semi-annually, annually, and across multiple years as desired. The data is predicated and populated from ongoing monthly surveys. The surveys will include a nationally representative sample of the U.S. population, age 18 and older.

3. Is this collection able to be completed electronically?

In furtherance of the Department of State's efforts to provide an electronic option for data collection, a letter inviting persons to participate in the study is mailed via USPS to persons residing at sampled addresses each month. The letter provides the options of voluntarily participating in the study by the web/internet or telephone.

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

This collection does not duplicate any other information collection. The Department of State

has attempted to establish an accurate demand figure by an extensive review of all known passport statistical databases. Passport Services has undertaken several prior surveys, with the initial Passport Demand Forecasting Study being implemented in 2007.

5. *Describe any impacts on small business.*

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

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

The requested survey data is necessary in order to establish an accurate estimate of the volume and timing of passport applications for the purpose of monitoring, assessing, and forecasting passport demand on a continuous basis for the U.S. population. Without such information, Passport Services will not be able to make duly informed decisions on hiring and training staff or increasing other resources and infrastructure to handle passport demand. If the survey is not conducted, Passport Services will not have reliable information to make resource-related decisions. This situation could result in the under or over estimation of demand, delayed passport issuance, adverse customer service, and/or excessive resource allocation, which could result in a waste of taxpayer money and Department resources.

7. *Are there any special collection circumstances?*

This data collection consists of a voluntary survey. Respondents are told at the onset of the survey that the data is kept strictly private to the extent permitted by law and that identifying information is not released outside of the Department. This notice is also repeated to the respondents prior to soliciting any demographic information.

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

The Department submitted a 60-day notice to the *Federal Register* (OMB Number 1405-0177) to solicit public comments, which was published on June 10, 2020, 85 FR 34492. The Department received two substantive public comments in response to the 60-day notice.

- The first comment related to the ability to choose gender options in the survey. We intend to revise the survey instrument in the next six months to include a third gender option, corresponding to the “X” option provided on passport applications. While survey respondents will be given options to choose nonbinary gender categories, such responses will – for weighting purposes only – be set to missing and then imputed to one of the binary categories. This is necessary because gender benchmarks available from the Census Bureau are currently in binary form. Given the small number of respondents who might choose a nonbinary response option for gender, we anticipate the impact of this change to be relatively small. Nonetheless, we plan to phase in this change over several months via a pilot study. (Please see proposal in Supplement on Pilot Study.)
- The second comment focused on the effects from COVID-19 and travel rates to the survey and that a standard forecast model could be limited unless the forecast horizon is shortened. Additionally, the comment suggested the use of comparative analysis between U.S. infection rates at time of travel to those of the traveled countries. Though this is a helpful comment, this survey was designed to not ask sensitive questions and to only take 10 minutes to complete, and we decided to not add any new questions in response to the COVID-19 pandemic. We do capture short-term indicators of travel and passport demand

from other sources such as monthly Google trends, economic factors such as consumer confidence, unemployment rates, and travel industry data. We are also closely monitoring state policies and other aspects related to COVID that could impact passport operations.

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

Passport Services does not provide any payments or gifts to respondents for participation in the survey.

10. *Describe assurances of privacy/confidentiality*

Respondents are assured at the onset of the survey that the data will be kept strictly private to the extent permitted by law and that identifying information will not be released outside of the Department. This notice is also repeated to the respondents prior to soliciting any demographic information.

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

The Department collects demographic information on this survey, including gender information. As in virtually all scientific studies using survey data, this demographic data is used to weigh the responses of those who complete the survey against the national demographics. Doing so ensures our findings give proper representation to people of different genders, ethnicities, age groups, and income levels and does not skew our findings towards the opinions of the most responsive demographics. This demographic data is only used by the Department of State to ensure our survey results accurately represent the broad swathe of the American public. We do not use it directly for any other reason, including programmatic ones.

The survey results delivered to the Department of State are anonymous and do not include address, name, or other PII besides the described demographic data. It could still theoretically be possible, although improbable, to identify respondents with unique demographic characteristics within constrained geographic areas served by the various regional offices. So appropriate measures are being taken to safeguard the data and only report it in aggregated form.

Given the sensitive nature of this information, every effort will be taken to safeguard it, including implementing encryption in transit, implementing encryption at rest, and controlling access to approved State Department employees and contractors.

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

The annual burden time for Passport Demand Forecasting Monthly Survey is estimated to be approximately 5,000 hours. Each survey is estimated to take 10 minutes and will be conducted on a monthly basis. Approximately 2,500 respondents will be surveyed per month, totaling 30,000 respondents per year, and an approximate annual total of 5,000 hours (30,000 x 10 minutes /60). Based on the chart below, the estimated annual hour cost burden is \$128,600.

<i>(a) Description of the Collection Activity</i>	<i>(b) Estimated Total Annual Burden on Respondents (Hours)</i>	<i>(c)¹ Estimated Average Income per Hour</i>	<i>(d) Estimated Cost to Respondents</i>
<i>Phone survey</i>	<i>2,500 hours</i>	<i>\$25.72</i>	<i>\$64,300</i>
<i>Internet/ web-based survey</i>	<i>2,500 hours</i>	<i>\$25.72</i>	<i>\$64,300</i>
<i>Totals</i>	<i>5000 hours</i>	<i>---</i>	<i>\$128,600</i>

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

There are no cost to respondents.

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

The estimated cost to the Federal Government is \$1,648,056 for FY 2020 for the Passport Demand survey.

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

There is a reduction in burden. The sample size was reduced from 4,000 respondents per month to approximately 2,500 respondents per month since the last collection was approved.

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

No information that can be used to identify an individual will be published. In order to meet informational requests and promote transparency, aggregated reports and analyses may be published concerning the covariates of passport demand and forecasts of passport demand.

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

The Department of State displays the expiration date for OMB approval on the survey collection instruments and provides it over the phone to respondents.

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

Passport Services is not requesting any exceptions to the certification statement identified.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

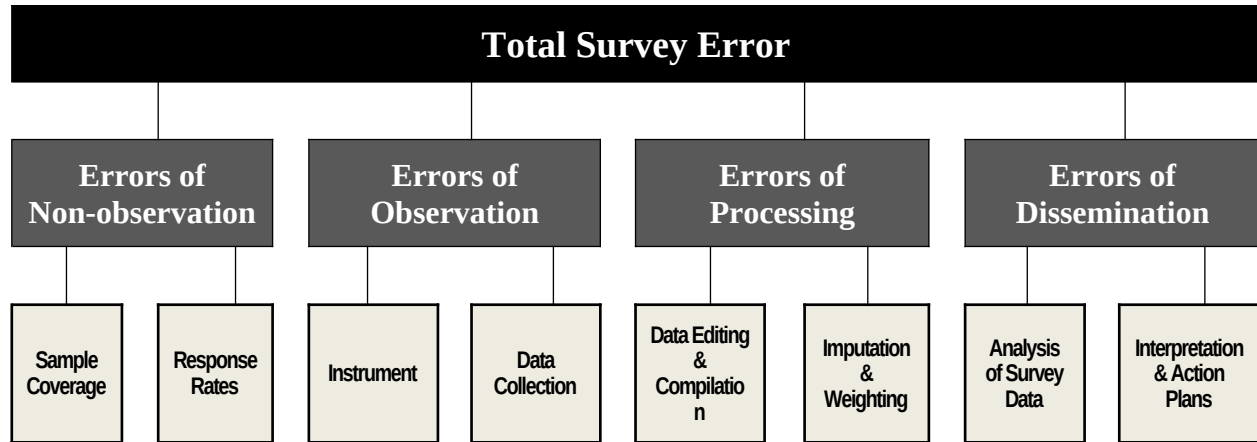
More than ever before, key decision makers rely on empirical guidance for improving the operations of their organizations. Passport Services' study relies on scientific sample survey, diligent survey administration, effective analysis of survey data, and accurate interpretation of the results. The Passport Demand Forecasting Survey is a critical component of Passport Services' strategy to marshal empirical data for making efficient, accurate management decisions because it provides Passport Services with reliable projections of demand for U.S. passports.

Fundamental to our strategy is recognition of the fact that rigorous survey research programs are

¹ Bureau of Labor Statistics: https://www.bls.gov/oes/current/oes_nat.htm#00-0000

designed and implemented to minimize the so-called *Total Survey Error*, as depicted in the following diagram. Under this comprehensive framework each component of error receives proper attention, since with imbalanced focus on any particular source of error other error components will gain opportunities to grow and create weak links in the survey process.

Figure 1. Components of total survey error



Striking an optimal balance requires academic knowledge, hands-on experience, and transparent execution. Conducive to this objective is the solid – yet intuitive – design that Passport Services has envisioned for this study, the main components of which are outlined in this section. Specifically, we will discuss:

- B1.** Design and selection of representative samples that are probability-based;
- B2.** Collection of reliable data using a respondent-friendly protocol;
- B3.** Effective data enhancements procedures; and
- B4.** Reliable demand projections and timely reporting of the results.

B1. DESIGN AND SELECTION OF REPRESENTATIVE SAMPLES

This forecast study employs an address-based sampling (ABS) methodology to reach a probability-based sample of the U.S. households every month. Increasingly, survey researchers are considering address-based sampling (ABS) methodologies to reach the general public for data collection applications. Essentially, there are three main factors for this change:

- Evolving coverage problems associated with the traditional methods of sampling;
- Eroding rates of response to single modes of contact; and
- Recent improvements in the databases of household addresses available to researchers.

Indeed, recent advances in databases of household addresses have provided a promising alternative for surveys that require contacts with representative samples of households. The *Computerized Delivery Sequence File (CDSF)* of the USPS is a database that contains all delivery points in the United States, a summary of which is provided in the following table. For this survey the monthly sample of addresses are obtained from the enhanced ABS frame developed by Marketing Systems Group (MSG).

Table 2. Distribution of the CDSF delivery type points

Delivery Point Type	Count
City Style/Rural Routes	120,843,190
Traditional P.O. Box	14,184,975
Only Way of Getting Mail (OWGM) P.O. Box	1,433,416
Seasonal	847,540
Educational	95,691
Vacant	2,861,124
Throwback	233,299
Drop Points	739,338
Augmented addresses (by MSG)	108,452
Total	141,347,025

By identifying the latitude and longitude of each address MSG can create a one-to-one correspondence between the Postal geographic indicators, which are suitable for mail delivery, and those suitable for sampling designs based on the Census geographic definitions. Subsequently, the resulting database is augmented with a list of geo-demographic indicators to evolve the raw CDSF into an effective sampling frame suitable for selection of probability-based samples.

For this study a monthly sample of approximately 28,100 addresses will be selected to represent the nation. This sample is selected from the MSG-enhanced ABS frame, which is updated on a quarterly basis. Each sample address is name and telephone matched, with the expectation that up to 40 percent of addresses link to a landline telephone number. Moreover, each address has a set of geo-demographic data appended to it by relying on public and commercial sources.

As detailed later, matched telephone numbers are used as part of our nonresponse follow-up to maximize response rates, whereas the appended ancillary data supports our nonresponse bias analysis to help develop effective weighting procedures. While a subset of such data is available for individual addresses, others are retrieved at higher levels of aggregation, such as Census Block Group (CBG) or ZIP Code.

On a monthly basis, national estimates are required for this study. To ensure that survey estimates for each of the 25 geographically-based passport agencies are of equal precision, each monthly sample is stratified accordingly to include an equal number of sample addresses per agency. Specifically, the total monthly sample of approximately 28,100 addresses is stratified into 25 strata of 1,124 addresses each.

The table above provides the distribution of addresses and expected sample size. Note that less than 3 percent of all addresses are currently marked as “vacant” according to the CDSF. Given that a small percentage of such addresses can be occupied by the time the survey administration begins for a given month, it is possible to include a nominal fraction of such households as part of the sampling frame to minimize under-coverage.

B2. DATA COLLECTION

Each month about 2,500 completed surveys will be secured using multiple methods of survey administration. For this study both web and telephone modes of data collection are used to produce the highest rates of response by making the survey experience as convenient for respondents as possible. Briefly, our survey administration protocol consists of the following

main steps:

- Approximately 25 days before the beginning of the study month a cross-sectional random sample of approximately 28,100 addresses is selected from the latest MSG-enhanced version of the CDSF.
- MSG will provide the sample to the survey vendor SSRS approximately 15 days prior to the study month.
- Five days before the beginning of the month, invitation letters are mailed to sample households in Alaska and Hawaii.
- Four days before the beginning of the month, invitation letters are mailed to sample households in the Pacific and Mountain time zones.
- Three days before the beginning of the month, invitation letters are mailed to sample households in the Central and Eastern time zones; this staggered mailing is designed to allow for actual receipt of the invitations to occur simultaneously throughout all selected households nationwide.
- Sample households may begin responding to the invitation by web or inbound telephone call on the first day of the month, estimated to be concurrent with receipt of the letter.
- On the first day of the month, outbound telephone calls begin to all non-responding households with telephone numbers appended to their records;
- On the ninth day of the month, reminder letters are mailed to the remaining non-responding households in Alaska and Hawaii;
- On the tenth day of the month, reminder letters are mailed to the remaining non-responding households in the Pacific and Mountain time zones;
- On the eleventh day of the month, reminder letters are mailed to the remaining non-responding households in the Central and Eastern time zones;
- Data collection closes on the last day of each month upon completion of 2,500 total interviews within that month (to occur no later than the final day of the month); this total includes web responders, inbound telephone interviews, and outbound telephone interviews conducted to achieve the highest possible response rate.

Prior to the start of the month, the survey instruments are programmed and tested in two versions: one for online telephone interviewing (whether inbound or outbound); and the other for self-administration via the web. Data is collected throughout the month using all the available modes that uses one single sample file containing both the records with phone number matched and the unmatched records. The sample file is simultaneously managed regardless of the mode of survey completion. Survey responses, overall progress, progress by geographical areas, and sub-groups of interest are monitored in real time as every mode is captured in the same program and data file.

Approximately 25 days prior to the start of the month, the sample is matched to external records systems to generate as many mailings as possible addressed to the surname of the household members. The salutation strategy inserts a name when available, in addition to including “or Current Resident” on all outgoing mail pieces.

Within each responding household eligible for this study an adult householder familiar with the general travel habits of the given household is asked to participate on behalf of all members of his/her household. While web response is encouraged as the preferred mode when appropriate, inbound and outbound telephone are used as alternative means of completing the survey to increase response rates. Both the invitation, as well as outbound and in-bound phone efforts, stress the importance of selecting a respondent within the household who is at least 18 years of age and is familiar with the general travel habits and travel document needs of all household members. Subsequently, the respondent is asked to provide the number of individuals by age in the entire household, as well as to respond to questions about the travel needs for both the selected respondent and all eligible household members.

All completed surveys are managed through a unified system and sample file. This ensures that if a respondent completes the survey online or by calling the toll-free number, he or she is not contacted by an outbound dialing interviewer. Returns of invitations determined by the USPS to be *Undeliverable as Addressed* are expected to be received starting around the seventh day of the month. These records are processed and the sample file updated accordingly. Original invitations that had been name-matched during the sample preparation phase and mailed addressed to that surname's household but are returned as undeliverable by the USPS are revised and addressed to "Current Resident" in the reminder invitation mailing.

General public survey interviewing is usually dialed in the evening between 6:00 p.m. and 9:00 p.m. local time and during weekends. Day time outbound calls are also conducted as dictated by sample needs and respondent preferences. Experienced daytime interviewers are briefed to handle inbound calls and callbacks. The data collection team keeps its facilities open and available for inbound and outbound calls from 9:00 a.m. to 11:00 p.m. Monday through Friday; 11:00 a.m. to 6:00 p.m. on Saturday, and noon to 10:00 p.m. on Sunday, Eastern Standard time. In addition, a west coast facility remains open to accommodate outbound dialing through 9:00 p.m. local respondent time in Alaska and Hawaii.

All interviewers used for data collection are experienced survey research interviewers with prior training in use of Computer Assisted Telephone Interviewing (CATI) techniques. The training of SSRS interviewers surpasses industry standards, averaging about 24 hours before starting on any study. Their training includes an overview of survey research, equipment, and quality standards, as well as role playing and internal survey work. In addition, SSRS has an interviewer mentoring program whereby new interviewers are partnered with experienced supervisors and executive interviewers to allow for one-on-one training. Interviews are digitally recorded and reviewed with interviewers as part of the process of becoming high-quality, dedicated interviewers.

B3. DEGREE OF ACCURACY NEEDED FOR THE PURPOSE DESCRIBED IN THE JUSTIFICATION:

As mentioned earlier, Passport Services requires monthly national level estimates with a margin of error no larger than $\pm 5\%$ at the 95% confidence level. In order to meet these requirements, the Koniag Team will complete about 2,500 surveys per month. The sampling error associated with the national estimates based on a sample size of 2,500, including anticipated larger design effect, is about $\pm 2\%$ at the 95% confidence level.

B4. UNUSUAL PROBLEMS REQUIRING SPECIALIZED SAMPLING PROCEDURES

Passport Services desires that the survey be representative of the U.S. population, age 18 and

older. At this time, there are no anticipated problems requiring specialized sampling procedures. The Koniag Team can and will make adjustments as necessary.

B5. ANY USE OF PERIODIC (LESS FREQUENT THAN ANNUAL) DATA COLLECTION CYCLES TO REDUCE BURDEN

Passport Services does not anticipate the use of additional periodic data collection cycles.

C. METHODS TO MAXIMIZE RESPONSE RATES AND ADJUST FOR NONRESPONSE

All practical steps will be taken to maximize response rates to this survey. A sample of such steps includes:

- Building Credibility Through Use of an Advance Mailing:
 - Constructing the survey instrument to be as respondent-friendly as possible
 - Sponsor identification via signed letters by a Department of State official
 - Use of Department of State Graphics and color scheme
 - Reference to website URL's for study legitimacy validation
 - Provision of toll-free information line and email address to field respondents' questions
 - Call to action to respond by a specific deadline
 - Notification of on-going efforts to be conducted through the month to reach the selected household
- Outbound Calling Effort:
 - Up to eight attempts rotated through various day times: early evening, later evening, and weekends
 - Day time calls as requested by respondents
 - Specific call-back scheduling
 - Offering respondents the most convenient mode of data collection
- Reminder Attempts:
 - USPS returned mail are addressed to "Current Resident" for the reminder mailing
 - Reminder effort reiterates the importance of the study and contain all information in the original mailing in terms of rapport building
 - Establishment of legitimacy and availability of web and phone information for respondents who may have questions

Above and beyond the above measures, monthly survey data are adjusted to compensate for the inevitable nonresponse. We describe our approach to survey nonresponse adjustments and enhancements below.

Data from all scientific surveys are weighted before the resulting data can be used to produce reliable estimates of population parameters. While reflecting the selection probabilities of sample units, weighting also attempts to compensate for practical limitations of a sample survey, such as differential nonresponse and under coverage. Furthermore, by taking advantage of auxiliary information about the survey population, weighting can reduce the bias of survey estimates by enabling the responding subset of the sample to better represent its target universe. This is of particular importance for a tracking survey of this nature, since some of the month-to-month random variations can be minimized by weighting the data before survey estimates are produced.

Typically, the weighting process entails three major steps. The first step consists of computation of *design weights* as the reciprocal of selection probabilities, resulting from the disproportional allocation of the sample addresses to different passport agency areas. In the second step, design weights are adjusted for nonresponse – a process that is guided by a comprehensive examination of nonresponse patterns observed every month. In the third step, nonresponse-adjusted weights are further calibrated to known population benchmarks to further improve the representation of respondents. All weighting adjustment steps will go through a series of quality control checks to detect extreme outliers and to prevent computational inefficiencies.

For this survey we use the Weighted Adjustment *WTADJUST* procedure of SUDAAN to weight the monthly survey data². Unlike traditional ranking procedures that are based on iterative proportional fitting, this model-based approach incorporates more main effects and lower-order interactions of variables when computing weights. Moreover, because this procedure allows limiting the resulting weight adjustment factors, one can eliminate extreme weights early in the process and control the variability of the final weights. Consequently, with this alternative it is generally possible to achieve balance with respect to an expanded set of control totals while at the same time reducing the variance of weighted statistics.

Our nonresponse bias analysis includes comprehensive comparisons of the geo-demographic composition of respondents with their corresponding estimates as reported by Current Population Survey (CPS), or the American Community Survey (ACS) for smaller geographic levels. Each month a fresh round of nonresponse bias analysis is carried out to provide current guidelines for weight adjustments. In addition to compensating for differential nonresponse patterns on a monthly basis, this approach also takes into account seasonal variations when creating the final weights.

It should be noted that prior to computation of survey weights, it is necessary to impute missing data that will result from item nonresponse and data items that fail edit checks. Since missing data can create inefficiencies for demand projections, when appropriate we use the method of *weighted sequential hot-deck*³ to impute missing survey data. By incorporating the sampling weights, this method of imputation reflects the unequal probabilities of selection in the monthly sample while controlling the expected number of times a particular respondent's answer is used as a donor to replace missing values.

Finally, survey estimates can only be interpreted properly in light of their associated sampling errors. Since weighting often increases variances of estimates, use of standard variance

².R.E. Folsom and A.C. Singh (2000). "The Generalized Exponential Model for Sampling Weight Calibration." *Proceedings of the Section on Survey Research Methods of the American Statistical Association*, pp. 598-603.

³.Iannacchione, V.G. (1982). *Weighted Sequential Hot Deck Imputation Macros*. In *Proceedings of the Seventh Annual SAS User's Group International Conference* (pp.759–763). Cary, NC: SAS Institute, Inc.

calculation formulae with weighted data can result in misleading statistical inferences. For this survey we will use SUDAAN and Statistical Analysis System (SAS) software to compute weighted demand, variances of which are approximated using the *Taylor Series Linearization* technique. Without this any projections of demand are subject to confidence intervals with artificially narrow widths. That is, survey estimates show a larger level of confidence than what they actually should.

D. TESTING

The survey questionnaire has been internally pre-tested for timing, content, and clarity. Moreover, SSRS engaged in a formal initial pre-test of the survey instrument, conducted with a sample of 30 households to confirm that the screening questions and procedures, as well as all survey logic worked as intended. Although the pre-test was designed as a confirmatory procedure, any issues uncovered with survey instructions (such as item wording or incomplete response categories) were addressed with revisions that were incorporated into the final survey materials upon receipt of agency approval.

Survey procedures are tested in several ways and will be on-going when any changes are made to the base survey instrument. These tests will involve no more than nine participants to examine the comprehensibility, structure, and order of survey questions. All testing is done in the conduct of the monthly survey utilizing replicated sub-samples of the main sample file.

Based on its experience, SSRS has developed mailing materials and protocols, which should produce the rates of response required to reach the desired number of monthly interviews. SSRS plans no testing/experiments of different mailing procedures as a matter of course during the conduct of the fieldwork. Any contemplated mailing procedure changes will be based on observed response rates, mail return rates, and respondent feedback where available. Any proposed mailing procedure changes or experiments will be submitted for approval prior to implementation.

E. POINTS OF CONTACT FOR STATISTICAL DESIGN:

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