

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
U.S. Passport Renewal Application for Eligible Individuals
OMB #1405-0020 (Form DS-82)**

A. JUSTIFICATION

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

The U.S. Passport Renewal Application for Eligible Individuals (Form DS-82) is used by eligible citizens and non-citizen nationals (hereinafter, collectively referred to as “nationals”) of the United States seeking to renew their current or recently-expired U.S. passport (a travel document attesting to one’s identity and U.S. nationality).

The DS-82 solicits data necessary for Passport Services to issue a United States 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).

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, other laws and implementing regulations at 22 C.F.R. Parts 50 and 51. The specific regulations pertaining to the Application for a U.S. Passport by Mail are 22 C.F.R. 51.20 and 51.21.

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

The information collected on the DS-82 is used primarily to facilitate the issuance of U.S. passports to U.S. 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-82 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. nationals: 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-82 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)) the SORN for Passport Records (STATE-26)), and the SORN for Overseas Citizens Services Records and other Overseas Records (STATE-05).

The DS-82 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)?*

In an effort to provide customers with an electronic option to this paper-based form, the DS-82 is currently posted on the Department's website at travel.state.gov where applicants can fill out forms online and print them for submission. With the completed application, a 2-D barcode will print on each application. This barcode will be scanned by Passport Services and automatically record the applicant's information in the system. This process will save both Passport Services and the applicant time and reduce errors.

In pursuit of the goals of the Government Paperwork Elimination Act and Executive Order 13571, the Department is currently working with numerous stakeholders (Consular Systems and Technology, Consular Affairs Office of the Comptroller, Comptroller and Global Financial Services, Fraud Prevention Program, Diplomatic Security (DS), the Department of the Treasury, and others) to develop a live electronic DS-82 submission. The Department's goal is to have a completely functional Online Passport renewal electronic application available to the public by 2021.

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-82 is the Department of State form used by those U.S. nationals who meet the qualifications to apply for a U.S. passport book and/or passport card renewal by mail.

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-82 is crucial for documenting a U.S. national's request for a renewal 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 July 12, 2019, the Department of State published a 60-day notice in the *Federal Register* (84 FR 33313) to solicit public comments. No comments were received on [regulations.gov](https://www.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-82 collects personally identifiable information from the applicant necessary to re-establish nationality, identity, and entitlement to the issuance of a United States passport. The DS-82 requires a photograph from the applicant, which conveys biometric data required to validate the respondent's identity. The DS-82 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 .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-82s
FY 2019	7,100,000
FY 2020	6,200,000
FY 2021	6,055,000
Average	6,451,667

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 hour burden for the collection is:

$$6,451,667 \text{ (respondents)} \times 40 \text{ (minutes)}/60 \text{ hour} = \mathbf{4,301,111 \text{ hour time burden}}$$

The estimated cost to respondents is based on the civilian hourly wage rate of \$25.22 from the Bureau of Labor Statistics website multiplied by the annual time burden (4,301,111 hours). The Department used the Employer Costs for Employee Compensation released by the Bureau of Labor Statistics in 2019.¹

\$25.22 hourly rate x 4,301,111 hours = **\$108,474,019 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-82 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-82 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-82s. 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

Therefore, the total cost to the respondents is as follows:

6,451,667 (1)Passport Photo	X	\$15.00	=	\$96,775,005
6,451,667 (1)Postage	X	\$7.35	=	\$47,419,752
6,451,667 x 6 miles – Average Travel Cost	X	\$0.58	=	\$22,451,801

¹ Source: Bureau of Labor Statistics, “Employer Costs for Employee Compensation – March 2019,” <https://www.bls.gov/news.release/ecec.toc.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>.

Total Cost to Respondent			=	\$166,646,558
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14. Describe the cost incurred by the Federal Government to complete this collection.

Total Cost to Program: \$709,684,960

The estimated cost to the Federal Government, which is funded by Department of State fee collections, is calculated by multiplying the estimated number of respondents (6,451,667) x the fee charge for the collection (\$110). The cost includes the full cost to the Federal Government for passport application processing and production. This cost includes the cost of producing the DS-82 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.

$$6,451,667 \text{ (number of respondents)} \times \$110 \text{ (charge for collection)} = \mathbf{\$709,683,370}$$

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.

$$\mathbf{\$709,683,370} + \$1,590 \text{ (cost of publishing two FRNs)} = \mathbf{\$709,684,960}$$

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 7,261,667 (FYs 2016 - 2018) to 6,451,667 (FY 2019 – FY 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-82 receipts amounted to 7,222,726. 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 Federal Government costs reflects the decrease in the number of projected respondents and the inclusion of Federal Register Notice costs. The cost of service (\$110) has not changed since the last submission.

In addition to plain language changes and general format changes, which are consistent with the 2019 version of Form DS-11, the following content changes have been made to the form:

1. 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.
2. 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.
3. Page 1 Instructions – Section “Can I Use This Form” - moved checkboxes to left side
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,” statements four to seven were reworded for clarity.
6. Page 1 Instructions – Section “Can I Use This Form” - Added blue background color to “If you answered no to any of the statements above, STOP [...]” section.
7. 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-5504).
8. Page 1 Instructions – Section of text below “Can I Use This Form” – “Please Note:” reworded for clarity and relocated to top of Instruction page 3.
9. Page 1 Instructions – moved to “Failure to provide information requested” to “Warning” section on Instruction page 4.
10. Page 1 Instructions – “Notice To Applicants Residing Abroad” - moved up page and created section header
11. Page 1 Instructions – “Warning” – moved to top of instruction page 4
12. Page 1 Instructions - “See page 2 of...” - deleted to create more space.
13. Page 1 Instructions – Moved “Where Do I Mail This Application?” section from instruction page 2 to bottom of instruction page 1
14. Page 2 Instructions – Section “What Do I Send With this Application Form” – Reworded section title to “What To Submit With This Application,” reworded bulleted list for clarity, deleted “See below for detailed information” and added new printing instruction in section header.
15. Page 2 Instructions – List item #1 – revised for clarity.
16. Page 2 Instructions – List item #2 – deleted “(Photocopies Are Not Accepted)” because some documents are acceptable as a photocopy.
17. Page 2 Instructions – List item #2 – revised for clarity.
18. Page 2 Instructions – List item #3 – Changed title “The Current Passport Fees” to “FEES - travel.state.gov/passportfees”
19. Page 2 Instructions – List item #3 – reworded for clarity and moved “Overnight Delivery” and “For Faster Processing” text to “Where Do I Mail This Application?” on Instruction page 1.
20. Page 2 Instructions – List item #4 – revised for clarity.
21. Page 2 Instructions – moved “Where Do I Mail This Application?” to Instruction page 1. Added traceable mail recommendation under section title.
22. Page 2 Instructions – Reworded 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
23. Page 2 Instructions and throughout the form – changed “Passport Services” to “the Department of State” or “the Department.”
 24. Page 3 Instructions – “Federal Tax Law” moved to instruction page 4 and added “... your application may be denied...”
 25. Page 3 Instructions – Combined “Notice To Customers Applying Outside A Department of State Facility” section with “Fee Remittance” section to create “How Fees Are Established And Processed” located on Instruction page 3. Reworded for clarity.
 26. Page 3 Instructions – Combined “Use of Social Security Number” section into “Federal Tax Law” on instruction page 4.
 27. 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”
 28. 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 to “Protect Yourself Against Identity Theft - Report Your Passport Lost or Stolen” on Instruction page 3. Reworded for clarity. Added “or non-citizen national” to “A United States citizen...”
 29. Page 3 Instructions - Moved “Notice to U.S. Passport Card Applicants Only” to Instruction page 3 under “What is the Difference Between a Passport Book and a Passport Card?”
 30. Page 4 Instructions – Deleted “Electronic Passport Statement.” The information is no longer new and is available on website, if needed.
 31. Page 4 Instructions – Acts and Conditions – Deleted “...the portion of which applies should be lined out, and...” in the first paragraph, deleted the middle paragraph, and deleted “furthermore” from the third/final paragraph.
 32. Page 4 Instructions – Acts and Conditions – Changed “crime to “crimes statute.”
 33. Page 4 Instructions – Updated “Paperwork Reduction Act Statement” to match other passport forms.
 34. 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.”
 35. Page 1 Application – Deleted “Attention: Read WARNING on page 1 of instructions”
 36. Page 1 Application – Changed “For more information see page 1 of instructions” to “(See instruction page 3)”
 37. Page 1 Application – Reworded information on visa pages for clarity.
 38. Page 1 Application – Field #1. – Added “(Your full name must match previous passport or name change document)” to mitigate common application errors.
 39. Page 1 Application – Field #6 – Added “(see application status at passportstatus.state.gov)” to promote self-service tool for customers.
 40. Page 1 Application – Field #8 – Reworded for clarity and USPS Postal Addressing Standards.
 41. Page 1 Application – Field 10 – Added “Book” and “Card” to “Issue Date” fields
 42. Page 1 of Application – Field 10 – Added “U.S.” to “Passport”
 43. Page 1 Application – Field #11 – Removed “(Photocopies are not accepted!)” because some documents are acceptable as a photocopy.

44. Page 1 Application – Increased font size for “Applicant’s Legal Signature” and “Date”
45. Page 2 Application – Field #18 - Updated per USPS Postal Addressing Standards.
46. Page 2 Application – Field #19 – Added “Your” to “Emergency Contact” and changed “Relationship” to “Relationship to Applicant.”
47. Page 2 Application – Field #20 - Added “(If no travel plans, please write "none")”
48. Page 2 Application – Bottom Blank Section – Changed “STOP! YOU HAVE COMPLETED YOUR APPLICATION BE SURE TO SIGN AND DATE PAGE ONE” to “STOP! PLEASE BE SURE TO: 1. Print form on two separate pages 2. Sign and date on page one 3. Submit both pages (see instruction page 1)”
49. Page 2 Application – Deleted “Where Do I Mail This Application”

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. If there are no exceptions, write*

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.