

# **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

## **Request for Authentications Service**

**OMB #1405-XXXX (DS-4194)**

### **A. JUSTIFICATION**

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

The Request for Authentication Services (Form DS-4194) is used by individuals, institutions, and government agencies, to request the services provided by the U.S. Department of State's Office of Authentications within the Bureau of Consular Affairs, Passport Services Directorate, Support Operations, Office of Technical Operations (CA/PPT/S/TO/AUT). This office provides authentication services to U.S. citizens and foreign nationals for documents to be used for legal and administrative purposes abroad under the seal of the U.S. Department of State. The Department provides authentication services for citizens under the general authority of 22 CFR Part 131 and the statutory authority cited therein.

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

The DS-4194 solicits limited data for the Office of Authentications to aid in validating and issuing certificates in accordance with policies outlined in 22 CFR Part 131, Certificates of Authentication.

The information collected on the DS-4194 is used to facilitate the issuance of certificates of authentication to U.S. citizens and foreign nationals. The primary purpose for soliciting the information is to establish that the documentation submitted is the same as the documentation received and processed by the Office of Authentications. The DS-4194 is retained by the Department of State for one year for accountability and record-keeping purposes.

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

The DS-4194 form cannot be submitted electronically; however, the form is available on the Department's website, where it can be downloaded from <https://eforms.state.gov/> and printed for manual signature and submission by mail or hand-delivery. The Department is also continuing its efforts to make available more complete electronic options, while still meeting statutory requirements and standards for protecting U.S. national security.

*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-4194 is the sole Department of State form used by U.S. citizens and foreign nationals who require federal validation of documents authenticated by a U.S. state or other subdivision for use in other countries.

*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-4194 is crucial for facilitating the processing of retrieval of documents from drop-off service, mail-in and walk-in requests. For the front-end of the process, it verifies that documents submitted were in fact received by the Office of Authentications. For the back end of the process, it requires that every document be reconciled and accounted for delivery to the proper entity. This limits the chances of lost or misplaced documents. Lost application disputes can last for days, requiring the dedication of Department resources.

*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 18, 2021, the Department of State published a 60-day notice in the Federal Register to solicit public comments. 86 F.R. 46308. We received no comments.

*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 form does not ask questions of a sensitive nature.

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

The Department of State's Office of Authentications estimates that the average time required for this information collection is 10 minutes per response. Therefore, the estimated total annual burden for the collection is: 47,094 (number of respondents) x 10 (minutes) / 60 = **7,849** hours per year. The estimated number of minutes required per response was determined through consultation with Office of Authentications employees who completed the form to validate the time. The annual cost to respondents for the hour burden is based on the weighted wage rate category for "All occupations" from the U.S. Department of Labor Bureau of Labor Statistics website multiplied by the annual time burden. The wage rate is estimated to be \$37.90 per hour (\$27.07 average wage<sup>1</sup> x 1.4 multiplier). Therefore, the estimated annual burden hour cost to respondents "all occupations" is \$37.90/hour x 7,849 hours = \$. 297,477

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<sup>1</sup> Source: Bureau of Labor Statistics May 2020 National Occupational Employment and Wage Estimates, "All Occupations" Mean Hourly Wage ([https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000))

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

Respondents may submit DS-4194 forms to the Office of Authentications by mail or hand delivery. The estimated cost of printing the form, based on a quote from FedEx, would be approximately \$0.49 per copy.<sup>2</sup> Per information received from the United States Postal Service, the cost burden for postage is approximately \$1.00 per application for First Class mail with a flat envelope.<sup>3</sup> The total annual printing and postage cost burden for 47,094 respondents is approximately \$70,170, should every applicant print a copy of the form and decide to submit it in the mail. A breakdown of the printing and postage cost burden follows:

Black and White Printing (47,094 x \$0.49)	\$23,076
Postage (47,094 x \$1.00)	\$47,094
<b>Total Printing and Postage Cost to Respondents</b>	<b>\$70,170</b>

*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 \$270,563.50. The cost was calculated based upon the results of the Department's Cost of Service Model. The model calculated a fully burdened hourly rate for domestic employees, including Authentication Specialists. The average hourly rate for domestic employees working on this service is \$81.49, and includes salary, benefit, and overhead costs (security, IT, rent, etc.). The Office of Authentications estimates that reviewing the DS-4194 requires 3.5 minutes of an Authentication Specialist's time. Multiplying \$81.49/hr. by 3.5 minutes yields a per application processing time cost of \$4.75. Multiplying the projected number of respondents (47,094) by \$4.75 yields \$223,696.50.

This cost is added to the estimated cost of publishing the two required Federal Register notices. The estimated cost to publish one notice is \$795. A 60-day notice and a 30-day notice must be published for this form, so the total publishing cost to the U.S. government is \$1,590.

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

This is a new collection.

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

Quantitative summaries of Department of State passport and authentication activities are published periodically on the Department of State website at [www.travel.state.gov](http://www.travel.state.gov). Such summaries do not involve the use of complex analytical techniques.

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<sup>2</sup> Source: FedEx Copy and Print Services (<https://www.fedex.com/en-us/office/copy-and-print-services.html>)

<sup>3</sup> Source: USPS First Class Mail Pricing ([https://pe.usps.com/text/dmm300/Notice123.htm#\\_c037](https://pe.usps.com/text/dmm300/Notice123.htm#_c037))

*17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date. Otherwise, write “The Department will display the OMB expiration date.”*

The Department will display the OMB expiration date on the form.

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

The Department is not seeking exceptions to the certification statement.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.