

**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 are eligible to re-apply for a passport at no cost. A passport holder is eligible to re-apply for a new passport using the DS-5504 if: a) the passport holder's name has changed within the first year of the issuance of the passport; b) the passport holder's descriptive information on the data page of the passport is incorrect; 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 non-citizen 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 Notices (SORN) for Passport Records (STATE-26) and Overseas Citizens Services Records and Other Overseas Records (STATE-05) available in the Federal Register and online at <https://www.state.gov/system-of-records-notices-privacy-office/>.

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](http://travel.state.gov). However, the DS-5504 cannot be submitted electronically because the current U.S. passport and additional documentary evidence (e.g., 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 current U.S. passport holders who meet the qualifications to apply for a replacement passport at no cost.

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?*

The DS-5504 is one of three (3) information collections under review that requires development and testing of multiple supporting systems used to complete, adjudicate, and process the application. OMB approved changes to the three (3) information collections will require systems development and testing simultaneously. Therefore, it will be necessary to receive OMB approval of the DS-11, DS-82, and DS-5504 together.

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

The Department published a 60-day notice in the Federal Register to solicit public comments on this collection. The public submitted six comments about changing “sex” to “gender” on the form and passport and omitting the “sex” field from the form and passport.

The Department coordinated with the Center for Disease Control (CDC) to conduct a two-part qualitative study with the intent to have a scientific backing to the overall, federal definition of “X”. CDC’s results focused on participants’ responses surrounding the three themes of inclusivity, privacy, and clarity. The study results concluded that “unspecified or another gender identity” is the most appropriate definition for “X” gender marker. “Unspecified” is also the ICAO standard for third gender markers, aligning our efforts with that of the international community and further facilitating smooth travel for all U.S. citizens regardless of their gender identity. The Department updated the form to replace the term “sex” with “gender” and to be pronoun-inclusive of all genders. The U.S. passport conforms with the standards set by the ICAO, which among other things determines the various fields on the passport’s biographical data page. The Department acknowledges that the existing markers for male “M” or female “F” reflect an individual’s gender rather than their sex, but the label on the data field in the actual passport will not change unless the ICAO standards are amended.

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. More information on the routine uses of the information collected can be found in the Department of State’s Prefatory Statement of Routine Uses and in the Department’s System of Records Notices (SORN) for Passport Records (STATE-26) and Overseas Citizen Services Records and Other Overseas Records (STATE-05) available in the Federal Register and online at <https://www.state.gov/system-of-records-notices-privacy-office/>.

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

The DS-5504 collection of information asks the respondent to provide a Social Security number 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 22 U.S.C. 2714a(f)) and may subject the applicant to a penalty pursuant to 26 U.S.C. 6039E, which is enforced by the U.S. Department of the Treasury, Internal Revenue Service

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.

	<b>DS-5504s</b>
FY 2019 2021	141,000
FY 2020 2022	138,000
FY 2021 2023	135,000
<b>Average</b>	<b>138,000</b>

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 hour time burden to the respondent to complete this collection is:

$$138,000 \text{ (respondents)} \times 40 \text{ (minutes)} / 60 \text{ hour} = \mathbf{92,000 \text{ hour time burden}}$$

The estimated cost to respondents is based on \$27.07 (mean hourly earnings) based on estimated income per hour from the Bureau of Labor Statistics<sup>1</sup> x 1.4 (weighted wage OMB multiplier) = \$37.89 (weighted hourly wage). Therefore, the estimated total hour cost burden to the respondent to complete this collection is:

$$\$37.89 \text{ (hourly rate)} \times 92,000 \text{ (hours)} = \mathbf{\$3,485,880 \text{ hour cost burden}}$$

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 replacement 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 \$14.99 from Walgreens (\$14.99)<sup>2</sup>, CVS (\$14.99)<sup>3</sup>, and the United States Postal Service (USPS) (\$15)<sup>4</sup>.

<sup>1</sup> Source: Bureau of Labor Statistics, "Employer Costs for Employee Compensation – May 2020," [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

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

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

<sup>4</sup> Source: U.S. Postal Services, <https://www.usps.com/international/passports.htm#>.

DS-5504 applications are submitted by mail and are accepted in-person at passport agencies and U.S. embassies and consulates 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 \$7.70<sup>5</sup>.

The Department estimates that most respondents domestically submit their application to their local U.S. Post Office for processing, which is estimated to be an average distance of approximately three (3) miles one way and six (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 distance overseas that 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)<sup>6</sup>.

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

138,000 (1) Passport Photo	X	\$14.99	=	\$2,068,620
138,000 (1) Postage	X	\$7.70	=	\$1,062,600
138,000 x 6 miles – Average Travel Cost	X	\$0.58	=	\$480,240
<b>Total Cost to Respondent</b>			=	<b>\$3,611,460</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 **\$489,075**. To calculate this, we consider the hourly wage for a FY 2019 domestic Civil Service GS-11 step 10 (the highest level of a passport adjudicator), which is \$33.52<sup>7</sup> X 1.30 (30% overhead is assumed per position) = \$43.58. Passports Services estimates that reviewing the DS-5504 requires 4 minutes and 48 seconds (4.8 minutes) of a passport adjudicator's time. Dividing \$43.58/hr. by 60 minutes yields a processing time cost of \$0.73 per minute. Multiplying the processing time cost (\$0.73) by the amount of time it takes to adjudicate the DS-5504 (4.8 minutes) gives a total of \$3.50. Multiplying the projected number of respondents (138,000) by \$3.50 yields **\$483,000**.

We also consider 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

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

<sup>6</sup> 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>.

<sup>7</sup> 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](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/GS_h.aspx)

contractor labor, supplies, equipment, printing materials, delivery, overhead, support staff, etc.

The current cost is \$32.50 per 1000 forms<sup>8</sup>. 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	=	\$483,000
Cost to print the form	\$32.50 x 138	=	\$4,485
Cost of Two Federal Register Notices	\$795 x 2	=	\$1,590
<b>Total Cost to Federal Government</b>			<b>\$489,075</b>

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 FYs 2018 - 2020, the average total DS-5504 receipts amounted to 178,708 per year. Demand forecast projections, by their nature, will have some uncertainty in their accuracy, which can explain differences between actual and forecast.

In November 2019, Form DS-5504 received OMB approval renewing the continued use of this information collection for three years. This form has been amended based on a recent change in Department policy. The Department's new policy permits passport applicants to select the gender marker on their passport without presenting medical documentation. This policy change includes updating forms to add a third gender marker, "X," for applicants identifying as unspecified or another gender identity (in addition to the existing "M" and "F" gender markers).

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

- Instruction Page 1 –The section "IS THERE A FEE WITH THIS APPLICATION" the first sentence is updated to clarify the correct fee information to, *there is no fee to use this form unless expedited service is requested for a name change or limited passport replacement (see below). Note: A passport issued with a data error (e.g., name, gender, or place of birth) or printing error (e.g., data is missing on the biographical page, discoloration,*

<sup>8</sup> Source: Passport forms printing contractor Occam Solutions

*crooked printing, etc.) is corrected at no charge cost and no expedite fee if the passport is still valid.*

- Instruction Page 3 - More information is provided about field “3. Gender” (formerly titled “3. Sex”) on Page 1 and the gender marker options “M” (Male), “F” (Female), and “X” identifying as (Unspecified or Another Gender Identity) to be printed in a U.S. passport.
- Page 1 – Changed field “3. Sex” to “3. Gender” and provided the gender marker options “M” (for Male), “F” (for Female), and “X” identifying as (Unspecified or Another Gender Identity). Added a self-attestation statement that reads, “Changing Gender Marker?  Yes” to verify that the applicant is changing their gender marker from what they listed on a previously issued passport.

*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](http://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.