

**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT SUBMISSION**

**Statement of Exigent/Special Family Circumstances for Issuance  
of a U.S. Passport to a Child under Age 16  
OMB Control No. 1405-0216  
Form DS-5525**

**A. JUSTIFICATION**

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

The Statement of Exigent/Special Family Circumstances for Issuance of a U.S. Passport to a Child under Age 16 (DS-5525) is used in conjunction with the Application for a U.S. Passport (DS-11). This form is only for use if the notarized written consent of a parent with legal custody or legal guardian cannot be obtained. The statement must explain in detail the custodial parent's or guardian's unavailability, and recent efforts made to contact that parent or guardian. This form is not to be used if the non-applying parent or guardian refuses, or claims it is inconvenient, to provide notarized consent for the child applicant.

The DS-5525 form assists the U.S. Department of State to administer the regulations in 22 C.F.R. 51.28 requiring that both parents and/or any guardian consent to the issuance of a passport to a child under age 16, unless the applying parent has sole custody, or certain exceptions apply. This regulation was mandated by Section 236 of the Admiral James W. Nance and Meg Donovan Foreign Relations Authorization Act, Fiscal Year 2000 and 2001 (enacted by Public Law 106-113, Div. B, Section 1000 (a)(7)), and helps to prevent international parental child abduction, child trafficking, and other forms of passport fraud.

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

Form DS-5525 is used by Passport Services to establish a possible exigent/special family circumstance exception to Public Law 106-113, Section 236, requiring two-parent consent for a child's passport application.

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

The DS-5525 is intended to be submitted with the DS-11, which cannot be submitted electronically. As required by 22 C.F.R. Part 51, all DS-11 applicants (and applicants under 16) must appear in person for the execution of a passport application. However, the DS-5525 is on the Department's website, [travel.state.gov](http://travel.state.gov), available for printing in a PDF-fillable format.

*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.

*5. Describe any impacts on small business.*

The DS-5525 does not involve small businesses or other small entities.

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

The DS-5525 can serve as the statement describing exigent or special family circumstances, which is required if notarized written consent of a custodial parent or guardian cannot be obtained when the passport application is executed for a child under age 16. The statement must explain the reason for the request. The form is not to be used if the non-applying parent or guardian refuses, or claims it is inconvenient to provide notarized consent (using the DS-3053) for the child applicant. If the required statement is not submitted, or the circumstances do not meet the requirements, the child shall not receive a passport. Use of the DS-5525 is not mandatory. The required statement may be submitted in other formats provided they meet statutory and regulatory requirements.

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*

The Department of State published a 60-day notice in the Federal Register to solicit public comments on October 1, 2023 (Public Notice: 12181). No comments were received.

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. The Department provides no assurance of confidentiality.

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

The DS-5525 does not ask questions of a sensitive nature. In the course of using this form, the respondent might disclose information involving family matters.

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

The projected average number of DS-11 respondents from FY 2023-25 is 12,055,600. Through a Department-led frequency analysis, it was determined that 0.24% of DS-11s had a DS-5525 attached to it. Therefore, the projected number of respondents to the DS-5525 over the next 3 years is 28,933.

$12,055,600$  (DS-11 respondents)  $\times$   $0.0024$  = **28,933 annual respondents**

Passport Services estimates that the average time required for this information collection is 30 (minutes) per response. Therefore, the estimated total annual burden for the collection is:  
 $28,933$  (number of respondents)  $\times$   $30$  (minutes) /  $60$  = **14,467 hours per year.**

The estimated number of minutes 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 estimated cost to respondents is based on the civilian hourly wage from the Bureau of Labor Statistics website multiplied by the annual time burden (14,467 hours). The wage is estimated to be \$28.01. The Department used the Employer Costs for Employee Compensation released by the Bureau of Labor Statistics in 2021.<sup>i</sup>

14,467 (annual hours) x \$28.01 (average wage) = **\$405,221** (hour burden cost)

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

There is no cost to respondents.

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

To calculate the cost to the Federal Government, we take into account the hourly wage for a FY 2023 domestic Civil Service GS-11 Step 10 (the highest level of a passport adjudicator), which is \$36.95<sup>ii</sup>. Passports Services estimates that reviewing the DS-5525 requires 36 seconds of a passport adjudicator’s time, or 0.6 minutes. Dividing \$36.95/hr. by 60 minutes yields a processing time cost of \$0.62 per minute, and that cost multiplied by 0.6 minutes totals \$0.37. Multiply the projected number of respondents (28,933) by \$0.37 yields **\$10,705**. This total is added to the cost to the Federal Government to print the forms and publish the Federal Register Notices (FRNs).

The estimated amount to publish one Federal Register Notice (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**.

We also take into account the cost to print the forms. The DS-5525 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 \$30.63 per 1000 forms.<sup>iii</sup> Based on the projected number of 28,933 respondents per year for the next three years, at a cost of \$30.63 per thousand, the contractor printing cost to the Federal Government is **\$886**.

Cost to Print the form	\$30.63 x 28,933	=	\$886
Cost to publish two Federal Register Notices (FRNs)	\$795 x 2	=	\$1,590
Time and Expense to adjudicate form	28,933 x \$0.37	=	\$10,705
<b>Total Cost to Federal Government</b>			<b>\$13,181</b>

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

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

No substantive changes were made to the form

*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.

<sup>i</sup> Source: Bureau of Labor Statistics, “Employer Costs for Employee Compensation – May 2021,” [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

<sup>ii</sup> Source: Office of Personnel Management, “Pay & Leave,” <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/general-schedule>

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