

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Request for Authentications Service

OMB No. 1405-0254

DS-4194

A. JUSTIFICATION

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

The Request for Authentications Service (form DS-4194) is used by individuals, institutions, and government agencies to request the services provided by the Department of State's (Department) Office of Authentications within the Passport Services Directorate in the Bureau of Consular Affairs. The Office of Authentications 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 Department. 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 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 for one year for accountability and recordkeeping 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 can be downloaded from <https://eforms.state.gov/> and can be printed for manual signature and submission by mail or hand-delivery. The Office of Authentications certifies a variety of documents from commercial organizations, private citizens, and officials of federal and state governments. Documents include, but are not limited to, company bylaws, powers of attorney, trademark, diplomas, treaties, warrants, extraditions, agreements, certificates of good standing, and courier letters. The DS-4194 form is also used for Department official certificates that are issued for documents executed and/or records maintained by offices within the Department intended to be used in a foreign country. The DS-4194 form serves as a cover letter for the requested service.

For Apostille certificate requests, consistent with 22 CFR 131 and Department policy, an original signature with the raised or stamped seal of a federal agency must accompany the submitted document. Therefore, an Authentications Specialist must analyze the validity of the document prior to issuing certificates of authentication under the seal of the Department. Along with verifying the validity of the document, the Specialist's signature and embossed

seal of the Department confers Department approval. Specialists must physically examine the received document, then generate and affix the appropriate certificate prior to signing and sealing. Specialist signatures on the issued certification affixed to the document are examined by foreign governments to verify validity and meet foreign government requirements.

The Authentications Office complies with regulations directing international law and agreements pertaining to the authentication of documents for instrumentalities of the United States government, secretaries of state, federal officials, foreign diplomats, and private citizens. Electronic processing of the DS-4194 form is not an option. Submitting an online version of the DS-4194 would be counterproductive as the requestor would still need to submit the form along with the original documents for authentication. An online payment option is not feasible at this time.

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 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 documents from drop-off service, mail-in, and walk-in requests. For the front end of the process, it verifies that submitted documents were received by the Office of Authentications. For the back end of the process, it requires that every document be reconciled for delivery to the proper entity. This limits the chances of lost or misplaced documents. Lost application disputes may require several days to resolve and place a high demand on 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*

The Department published a 60-day notice in the Federal Register to solicit public comments on August 22, 2024 (Public Notice: 12503). 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. 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*

Respondent Hour Time Burden and Hour Cost Burden

The estimated number of respondents for this information collection is derived from the average number of applicants who submitted this form during the last three fiscal years.

	Respondents
FY 2021	60,463
FY 2022	56,781
FY 2023	64,958
Average	60,734

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.

Passport Services estimates that the average time required for this information collection is 10 minutes per response. Therefore, the estimated **total annual respondent hour time burden is: 10,122 hours.**

$$(60,734 \text{ annual respondents} \times 10 \text{ minutes} / 60 = 10,122)$$

The estimated cost to respondents is based on the civilian hourly wage listed in the Employer Costs for Employee Compensation released by the Bureau of Labor Statistics in 2023. The base hourly wage is estimated to be \$31.48ⁱ. We also incorporate a benefit multiplier of 1.3 and the total hourly wage is calculated to be \$40.92. The total hourly wage of \$40.92 is then multiplied by the annual time burden of 10,122 hours. Therefore, the estimated **total annual respondent hour cost burden is \$414,192.**

$$(\$40.92 \text{ total hourly wage} \times 10,122 \text{ annual hours} = \$414,192)$$

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

Respondents may submit the DS-4194 to the Office of Authentications by mail or via hand delivery. The estimated cost of printing the form, based on a quote from FedEx, is

approximately \$0.49 per copy.ⁱⁱ Based on a rate provided by the United States Postal Service, the postage cost of a flat envelope shipped via First-Class Mail is \$1.50.ⁱⁱⁱ Therefore, the total annual printing and postage cost for 60,734 respondents is approximately \$120,861, 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 (60,734 x \$0.49)	\$29,760
Postage (60,734 x \$1.50)	\$91,101
Total Cost to Respondents	\$120,861

The estimated **total annual respondent monetary burden is \$120,861**

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

Government Adjudication Cost

To calculate the cost to the Federal Government, we consider the average hourly rate for Authentication Specialists (\$91.26), plus benefit and overhead costs to include security, IT, rent, etc. The fully burdened rates are calculated using the Department’s Cost of Service Model and are based on FY 2023 costs.

Passport Services estimates that Authentication Specialists require 3.5 minutes to review the DS-4194. Multiplying \$91.26/hr. by 3.5 minutes yields a per application processing time cost of \$5.29. Multiplying the projected number of respondents (60,734) by \$5.29 yields \$321,280.

Total Government adjudication cost = \$321,280

Government Federal Register Notice Cost:

This number is added to the cost to the Federal Government to 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 of \$1,590.

Total Government Federal Register Notice cost = \$1,590

Therefore, the estimated annual cost to the Federal Government is \$322,870

(\$321,280 + \$1,590).

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

There are no substantive changes to the collection since the last renewal.

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

Quantitative summaries of Department passport and authentication activities are published periodically on the Department’s website at www.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 Department will display the OMB expiration date.

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.

ⁱSource: Bureau of Labor Statistics, “Employer Costs for Employee Compensation – May 2023,”

https://www.bls.gov/oes/current/oes_nat.htm#00-0000

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

ⁱⁱⁱ Source: USPS First Class Mail Pricing (https://pe.usps.com/text/dmm300/Notice123.htm#_c037)