

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Application for a U.S. Passport

OMB Number 1405-0004

Form DS-11

A. JUSTIFICATION

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

The *Application for a U.S. Passport* (form DS-11) is used by citizens and non-citizen nationals (hereinafter collectively referred to as “nationals”) of the United States who are applying for a U.S. passport and who must apply in person. The DS-11 solicits data necessary for the Department of State (Department) to issue a U.S. 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) for the issuance of passports to U.S. nationals.

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, and other applicable laws, as well as the implementing regulations of 22 C.F.R. Parts 50 and 51. Authority to collect the respondent’s Social Security number is also in 26 U.S.C. 6039E and 22 U.S.C. 2714a(f) (see response 11, below). The specific regulations pertaining to the Application for a U.S. Passport are in 22 C.F.R. 51.20 through 51.28.

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

The information collected on the DS-11 is used primarily to facilitate the issuance of passports to U.S. nationals. The primary purpose for soliciting the information is to establish identity, nationality, and entitlement to the issuance of a United States passport or related service, and to properly administer and enforce the laws pertaining to issuance thereof.

The DS-11 is retained in the files of the Department along with other documentation related to passport applications, adjudication, and issuance. Among other uses within the Department, 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 the passport bearer’s children. The records may also be consulted 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-11 may also be shared with certain parties outside of the Department, as permitted by the Privacy Act of 1974, as

amended, including as set forth in the Department's Prefatory Statement of Routine Uses, the Department's System of Records Notice (SORN) for Passport Records (STATE-26), and the SORN for 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-11 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-11 is currently available online at travel.state.gov. However, the DS-11 cannot be submitted electronically. As required by 22 U.S.C. 213 and 22 C.F.R. Part 51, all DS-11 applicants (including all applicants under the age of 16) must appear in person to execute their passport application. The form is posted on the Department's website where it can be filled out online and printed for manual signature and submission. With the completed application, a 2-D barcode is printed on each application. This barcode is scanned by the Department and automatically records the applicant's information. This process increases processing efficiency and reduces data 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 available elsewhere. The DS-11 is used by first-time applicants, applicants under the age of 16, and other individuals not eligible to apply for a U.S. passport book and/or passport card using the *U.S. Passport Renewal Application for Eligible Individuals* (form DS-82).

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-11 is crucial for documenting a U.S. citizen's request for a passport and for establishing the applicant's entitlement to a U.S. passport.

7. *Are there any special collection circumstances?*

The DS-11 is one of three information collections currently 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 collections will require simultaneous systems development and testing. Therefore, it is 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 on November 26, 2024 (89 FR 93389) to solicit public comments on this collection. The Department received no public comments, and is now soliciting comment on this collection for 30 days.

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 for the information collected can be found in the Department's Prefatory Statement of Routine Uses, the Department's System of Records Notice (SORN) for Passport Records (STATE-26), and the SORN for 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/>.

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

The DS-11 collects personally identifiable information from the applicant necessary to establish identity, nationality, and entitlement to the issuance of a U.S. Passport. The DS-11 requires the applicant's photograph which conveys biometric data required to validate the applicant's identity. The DS-11 also requests the applicant's Social Security number to help confirm the applicant's identity. 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. Consistent with E.O. 14168, "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government," the DS-11 also requests the applicant's biological sex at birth.

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 collection was calculated by taking the average (rounded) number of projected respondents for the next three fiscal years.

	DS-11 Projected Respondents
FY 2025	11,973,290
FY 2026	12,637,210
FY 2027	13,398,000
Average	12,669,500

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 85 minutes per response. Therefore, the estimated **total annual respondent hour time burden is 17,948,460 hours.**

(12,669,500 annual respondents x 85 minutes / 60 = **17,948,460**)

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 17,948,460 hours. Therefore, the estimated (rounded) **total annual respondent hour cost burden is \$734,451,000.**

(\$40.92 total hourly wage x 17,948,460 annual hours = \$734,451,000)

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

Respondent Monetary Burden

To properly complete and submit a DS-11 passport application, a respondent must provide proof of U.S. citizenship/nationality, proof of identity, and one passport photo. The estimated out of pocket cost associated with submitting the DS-11 includes the following:

- Print front and back copy of U.S. citizenship/nationality evidence (2 pages) and front and back copy of identification (2 pages) - Average copier print fee at \$0.40 (x 2 @ \$0.20/ea.) per black and white copy based on a quote from Staplesⁱⁱ
- Order passport photo - Photo fee of \$15.00 based on a quote from the United States Postal Service (USPS)ⁱⁱⁱ

The Department estimates that most respondents submit their application to a 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 applicants may need to travel to execute the form. To determine the travel cost to the respondent, the Department is factoring in the General Services Administration (GSA) reimbursement rate of \$0.67 per mile for privately owned vehicles (POV).^{iv}

A breakdown of respondent costs is outlined below:

U.S. Citizenship or Nationality Evidence (front and back copy)	12,669,500 respondents (2 pages @ \$0.20 each) x \$0.40 print fee	=	\$5,067,800
Identification (front and back copy)	12,669,500 respondents (2 pages @ \$0.20 each) x \$0.40 print fee	=	\$5,067,800
Passport Photograph	12,669,500 respondents x \$15.00 fee	=	\$190,042,500
Average Travel Cost	12,669,500 respondents x 6 miles x \$0.67 per mile	=	\$113,458,210
Total Cost to Respondent	\$313,636,310		

The estimated **total annual respondent monetary burden is \$313,636,310.**

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

Government Adjudication Cost

The estimated cost to the government, which is funded by Department fee collections, is calculated by multiplying the estimated number of annual respondents (12,669,500) by the unit cost for adjudication (\$134.67). The cost includes the full cost to the Federal Government for first time passport application, processing, and production. This cost includes the cost of producing the DS-11 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. Therefore, the **total Government adjudication cost is \$1,706,201,600.**

12,669,500 (number of respondents) x \$134.67 (unit cost for adjudication) =
\$1,706,201,600

Government Federal Register Notice Cost

The estimated amount to publish one Federal Register Notice (FRN) is \$795. A 30-day FRN and a 30-day FRN is published with a **total cost of \$1,590.**

Government Printing Cost

We also take into account the cost to print the form. The DS-11 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 \$44.78 per 1000 forms.^v Based on the projected number of

12,669,500 annual respondents per year, at a cost of \$44.78 per thousand, the contractor printing cost to the Federal Government is \$567,300.

Therefore, the estimated **total cost to the Federal Government is \$1,706,770,500.**

(\$1,706,201,600 + \$1,590 + \$567,300 = \$1,706,770,500)

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

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

The Acts or Conditions statement on the form was revised with the following language:

“The applicant agrees with the following statement:

I am not currently required to register under the sex offender registration program of any jurisdiction for a sex offense against a minor. I have not been convicted of a federal or state drug offense or convicted of a statutory "sex tourism" crime, and I am not the subject of an outstanding federal, state, or local warrant of arrest for a felony; a criminal court order forbidding my departure from the United States; or a subpoena received from the United States in a matter involving federal prosecution for, or grand jury investigation of, a felony.

If any of the above-mentioned acts or conditions have been performed by or apply to the applicant, a supplementary explanatory statement under oath (or affirmation) by the applicant is required to be attached and made part of this application.”

International Megan's Law to Prevent Child Exploitation and Other Sexual Crimes Through Advanced Notification of Traveling Sex Offenders (IML) was enacted in 2016 with the goal that government should identify the whereabouts of sex offenders, including when traveling internationally. See Public Law 114-119 (34 USC 21501-510). Title 22 was later updated to provide that the Secretary of State "shall not issue a passport to a covered sex offender unless the passport contains a unique identifier and may revoke a passport previously issued without such an identifier of a covered sex offender", reference 22 USC 212b(b). Further, it allows the Department to "require a passport applicant to disclose that they are a registered sex offender", reference 22 USC 212b(e).

The Department believes that modifying the Acts or Conditions section is an important step in furthering the 2023 U.S. National Strategy for Child Exploitation Prevention and Interdiction.

To comply with E.O. 14168, “*Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*,” the Department updated the form to replace the term “gender” with “sex.” The U.S. Passport conforms with the standards set by the E.O. and the International Civil Aviation Organization, which among other things determine the various fields on the passport’s biographical data page. Consistent with the E.O., the revised DS-11 will request the applicant’s biological sex at

birth, male “M” or female “F.” Amendments to the fields and instructions (section 3) have been made to reflect this.

To allow updates as the Department continues to modernize the passport process, including the use of online payment mechanisms, the Department has updated the fees section to direct applicants to travel.state.gov for more information on fees and methods of payment.”

The USCIS Registration A-Number (A-Number) field has been added to page 1 of the application section of the form. Adding the A-Number to the DS-11 is a critical part of the Department’s Transformation Project to fully achieve an electronic adjudication process. The A-Number would facilitate future electronic adjudication by eliminating the requirement that first-time applicants born outside the United States submit an original Certificate of Naturalization or Citizenship. Instead, adjudicators would be able to verify citizenship by searching by the A-Number in the Person Centric Query Service (PCQS), a USCIS database. The A-Number is the easiest and most efficient way for adjudicators to search in PCQS.

Question 21 - *Have you ever applied for or been issued a U.S. Passport Book or Passport Card?* has been revised to include additional space for applicants to provide a detailed explanation of the circumstances regarding the loss or theft of their card/book, consistent with the requirements of 22 C.F.R. Part 51.8. The applicant will be given a reasonable opportunity to provide a sufficient and credible explanation and to state whether a police report was filed.

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

Quantitative summaries of Department passport activities are published periodically on the Department 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.

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.

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

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

ⁱⁱSource: Staples, <https://www.staples.com/services/printing/copies-documents-printing/>

ⁱⁱⁱSource: U.S. Postal Service, <https://www.usps.com/international/passports.htm#>

^{iv}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>.

^vSource: Passport forms printing contractor Occam Solutions