

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Affidavit of Identifying Witness OMB Number 1405-0088 DS-71

A. JUSTIFICATION

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

The Affidavit of Identifying Witness (DS-71) is used in conjunction with the Application for a U.S. Passport (DS-11). It is used by Passport Agents, Passport Acceptance Agents, and Consular Officers of the Department of State to collect information for the purpose of establishing the identity of a passport applicant who has not submitted adequate evidence of identity with his/her passport application. This affidavit is executed by a witness who affirms that he/she can identify the applicant.

22 U.S.C. § 211a, et seq.: Authority to grant, issue, and verify passports

Executive Order 11295: Rules governing the granting, issuing, and verifying of United States passports

22 C.F.R. Part 51, Passports, including 22 C.F.R. 51.24, Affidavit of Identifying Witness

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

The DS-71 is issued by the Department of State, and when completed, is evidence of a passport applicant's identity. Lack of sufficient identity information may result in the denial of a passport application.

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

Department regulations at 22 C.F.R. 51.24 require the identifying witness to execute this document before the person who accepts the passport application. Therefore, an original signature is required, and thus a complete end-to-end electronic submission for this form is not possible. Form DS-71 is only available at acceptance facilities, passport agencies, and U.S. embassies and consulates. This form must be completed and signed in the presence of an authorized Passport Agent, Passport Acceptance Agent, or Consular Officer.

4. *Does this collection duplicate any other collection of information?*

The DS-71 is the sole Department of State form that is used when a passport applicant cannot furnish sufficient evidence of identity and seeks to submit a statement of an identifying witness in support of the application.

5. *Describe any impacts on small business.*

The collection of information does not involve small businesses or other small entities.

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

If the information solicited in the DS-71 were not collected, passport applicants who lack sufficient evidence of identity (such as government-issued photo IDs) would be unable to establish their identities and would be unable to obtain U.S. passports.

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 May 15, 2025 (Public Notice: 12721). One comment was received and determined to be non-substantive.

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*

The Department provides no promises of confidentiality, other than those included in the Privacy Act and other federal statutes. This form includes a Privacy Act Statement listing the legal authorities for requesting, and the authorized routine uses of, the information collected.

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

The DS-71 asks the identifying witness to provide a Social Security number if one is available, and if he/she wishes to disclose it. The DS-71 is used in rare circumstances when an applicant does not submit sufficient identity evidence for passport issuance. By obtaining the identifying witness' Social Security number, the Department of State can use the databases at its disposal to assist in confirming the identity of the witness.

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

Respondent Hour Time Burden

Passport Services estimates that the average time required for this information collection is 5 minutes per response (the respondent is only responsible for half of the fields - the other fields are completed by a Passport Agent, Passport Acceptance Agent, or Consular Officer). It has also determined, through a time and motion study, that 0.35% of DS-11s have a DS-71 associated with it. For the next three fiscal years, the projected average number of DS-11 respondents is 12,669,500 (rounded). Therefore, the estimated annual number of DS-71 respondents is 44,340 (12,669,500 x .0035). To determine the time burden, we multiply the number of respondents (44,340) by the response time (5 minutes) and divide by 60. As a result, the estimated **total annual respondent time burden for the collection is 3,695 hours.**

$(44,340 \times 5 \text{ (minutes)}) / 60 = 3,695 \text{ hours per year}$

Respondent Hour Cost Burden

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 2025. The base hourly wage is estimated to be \$32.52ⁱ. We also incorporate a benefit cost of \$14.68 and the total hourly wage is calculated to be \$47.20. The total hourly wage of \$47.20 is then multiplied by the annual time burden of 3,695 hours. Therefore, the estimated (rounded) **total annual respondent hour cost burden is \$174,400.**

$(\$47.20 \text{ total hourly wage} \times 3,695 \text{ annual hours}) = \$174,400$

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

There is no cost to the respondent associated with this form.

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 use the hourly wage for CY 2025 for a domestic Civil Service GS-11 step 10 (the highest level of a passport adjudicator), which is \$38.69. Passports Services estimates that reviewing the DS-71 requires 1 minute of a passport adjudicator's time. Dividing \$38.69/hr. by 60 minutes yields a processing time cost of \$0.65 per minute. Multiplying the projected number of respondents (44,340) by \$0.65 yields \$28,820. Therefore, the **estimated total Government adjudication cost is \$28,820.**

Government Federal Register Notice Cost

The estimated amount to publish one Federal Register Notice (FRN) is \$795. A 60-day FRN and a 30-day FRN is published with a **total cost of \$1,590.**

Government Printing Cost

We also include the cost to print the form. (This form is only available at an acceptance facility, passport agency, or U.S. embassy/consulate. The applicant cannot print this form at home). The form 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 \$38.54 per 1000 forms. Based on the projected number of 44,340 respondents per year for the next three years, at a cost of \$38.54 per thousand, **the printing cost to the Federal Government is \$1,710.**

Therefore, the estimated **total cost to the Federal Government is \$32,120.**

$(\$28,820 + \$1,590 + \$1,710 = \$32,120)$

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

There are no substantive changes to the collection since the previous submission.

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

The data gathered in this collection of information will not be published.

17. *If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.*

Expiration date for OMB approval will be displayed.

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

No exceptions to the OMB certification statement are being requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

iSource: Bureau of Labor Statistics, “Employer Costs for Employee Compensation – December 2024,”
<https://www.bls.gov/news.release/pdf/ecec.pdf>