

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Statement Regarding a Lost or Stolen U.S. Passport Book and/or Card OMB Number 1405-0014, DS-64

A. JUSTIFICATION

1. A passport applicant must submit a form DS-64, Statement Regarding a Lost or Stolen U.S. Passport Book and/or Card, with an application for a new U.S. passport book or card when a previously issued valid or potentially valid U.S. passport book or card cannot be presented. To assist in protection against identity theft, a passport bearer shall also submit a form DS-64, after a loss or theft has taken place even if the bearer does not apply for a new U.S. passport. The statement must detail the circumstances of the loss or theft, as required in federal regulation 22 C.F.R. § 51.8(b), and any efforts made to recover it.

Entering a report of a loss or theft of a U.S. passport book or card in the passport data system, as mandated by 8 U.S.C. § 1737, requires accurate verification of the reported passport. Collection of the social security number on form DS-64 is included to assist in correctly identifying the passport that needs invalidation.

The legal authorities under which the information is requested include, but are not limited to the following:

22 U.S.C. § 211a et seq.;

Executive Order 11295;

22 C.F.R. Part 51, including 22 C.F.R. 51.8 & 51.2;

8 U.S.C. § 1737;

18 U.S.C. § 1028; and

18 U.S.C. § 1544.

2. The Department uses the information obtained from the DS-64 to record a report of a lost or stolen passport, to invalidate the lost or stolen passport, and as part of the adjudication of an application for a new U.S. passport. This helps the Department to ensure that no person shall bear more than one fully valid or potentially valid U.S. passport book and/or passport card at any one time, except as authorized by the Department. The information is also used to combat passport fraud and misuse.
3. Currently, the DS-64 is available on the Department's website, (<http://www.state.gov/m/a/dir/forms/index.htm>) where applicants can print it for completion, signature and submission.

In pursuit of the goals of the Government Paperwork Elimination Act and Executive Order 13571, The Department is also developing a new submission option for the DS-64 that is fully electronic. Once this electronic submission option is available, the DS-64 can be completed, signed, and submitted electronically. The public will still have the option to call the National Passport Information Center (NPIC) or mail in a hard copy of the DS-64 form.

As per prior OMB guidance on the subject, the Department has assessed the risks associated with the fully electronic submission of DS-64 forms. Following this assessment, the Department concluded that the proposed online process provides sufficient protections. Use of the online tool will be limited to adults. For the lost or stolen passports of a minor, or when the electronic report of a lost or stolen passport is insufficient, the Department will still require that a paper copy of the DS-64 be submitted with the hand signature of the person submitting the form. Under the existing lost or stolen passport book or card reporting process, regardless of whether the signed DS-64 form is submitted, the passport is cancelled within 24 hours of a received report to limit potential misuse. The online process would follow the same 24-hour cancellation policy.

The Department expects the online submission option to be ready when the DS-64 is renewed in 2015.

4. The DS-64 is the form used solely by the U.S. Department of State for the purpose outlined in item 2. The information collected does not duplicate information gathered elsewhere.
5. The collection of information does not involve small businesses or other small entities.
6. If the information were not collected, the Department would have difficulty determining whether to issue a new U.S. passport book or card to persons whose U.S. passport books or cards have been lost or stolen, and would also have difficulty in combating passport fraud. Elimination of the form would significantly increase the Department's costs by necessitating more labor-intensive methods of collecting the information, and could have serious consequences for national security and law enforcement.
7. No such special circumstances exist.
8. The Department published a 60-day notice in the *Federal Register* to solicit public comments on this collection. See 80 FR 6566, dated February 5, 2015. The sole comment received proposed charging a \$2,000 fine for lost passports and proposed that each passport showcase a fingerprint. Regarding the fine, any fee change must be proposed under a rulemaking process and is therefore outside of the scope of this information collection. Fingerprints have been previously considered as a second biometric for passports in addition to the photograph biometric. The initial collection of fingerprints would require a live enrollment process in which customers will have to appear in-person at an acceptance facility. A fingerprint requirement will also require customers to appear in person for renewals of their passports

since the fingerprint images, which may have changed slightly over time, will have to be re-collected. The convenient renewal process by mail would therefore be seriously impacted. Cost analysis provided from the Government Accountability Office estimated the cost to the government would be as much as \$6.6 billion dollars in initial costs and \$1.96 billion in recurring costs to implement a fingerprint enrollment infrastructure. Therefore, adding fingerprints as second biometric in U.S. passports was determined to have far-reaching operational and resource implications for the Department and great inconvenience to the public, with little benefit.

9. This information collection does not provide any payment or gift to respondents.
10. The Department makes no promise of confidentiality, other than those contained in statutes. The form includes a Privacy Act Statement explaining the routine use exceptions to the Act. (5 U.S.C. § 552a)
11. The DS-64 collection of information asks the respondent to provide a Social Security number to identify and confirm that the person completing the form is also the same person who held the lost or stolen passport book and/or card. Moreover, the applicant's Social Security number helps the Department accurately identify the passport being reported lost or stolen so that the correct passport can be invalidated.
12. Passport Services estimates that the average time required for this information collection is 10 (minutes) or 0.16 (hours) per response. Therefore, the estimated total annual burden for this collection is:

$527,334$ (estimated average number of respondents for FY16 – FY18) \times 10 (minutes) / 60 = 87,889 hours per year.

The estimated number of minutes required per response is based on counting the time required to search existing data sources, collect and provide the necessary information, make photocopies of the front and back of the respondent's identification document, review the final information, and submit to Passport Services for processing. Passport Services ascertained the estimated time required to complete the respondent's portion of the form through consultation with a small group of Consular Affairs employees. In addition, Passport Services has increased the estimated number of minutes per response from the previous 5 minutes to 10 minutes to allow for travel time for the respondents that require travel to a local business to make photocopies of their identification document.

To estimate the cost to respondents for this form based on the hourly wage and weighted wage multiplier, the Department calculated the following:

\$22.61 (mean hourly earnings based on estimated income per hour from the Bureau of Labor Statistics <http://www.bls.gov/ncs/ocs/sp/nctb1475.pdf>) x 1.4 (weighted wage OMB multiplier) = **\$31.65** weighted wage

87,889 (annual hours) x \$31.65 (weighted wage) = **\$2,781,687** (yearly hour burden cost)

13. The DS-64 may be submitted in conjunction with a DS-11, "Application for a U.S. Passport", or on its own by mail at an estimated cost of \$0.49 per mailing. The Department estimates that about 58,000 respondents choose to submit the DS-64 on its own by mail. In order to properly complete and submit a DS-64 on its own, an applicant must submit a photocopy of government issued identification containing his/her photograph as specified in the How To Report a Lost Or Stolen U.S. Passport Book and/or Card section on page 1 of the form. The cost of a black and white photocopy of an identification card is \$0.22 (front only) based on a quote from a local copier business.

58,000 respondents x (\$0.22 per photocopy + \$0.49 per mailing) = **\$41,180 cost burden**

The Department also estimates that 50% of the total 58,000 respondents/year who submit the DS-64 on its own do not have access to free copies available at Acceptance Facilities and Department field offices worldwide. Again, the average cost of to print the form is \$0.22.

(0.5 of 58,000 respondents) x \$0.22 (1 form) = **6,380 additional cost burden**

\$41,180 + 6,380 therefore equals a total cost burden of **\$47,560** to respondents per year for a three year period.

14. The Department pays a contractor for materials and/or supplies to produce the DS-64 form. The estimate provided to the Department by the contractor includes cost for contractor labor, supplies, equipment, printing, materials, delivery, overhead, support staff, etc. Using the estimated projection of 527,334 respondents (rounded up to **528,000**) per year for FYs 2016–2018 at a cost of **\$15 per thousand**, the contractor cost to the Federal Government is **\$7,920**.

Also, the Department is providing the passport specialist time and salary cost, which was derived using 2013 Time and Motion (T&M) Study numbers that measured processes conducted by passport specialists. This includes time spent to adjudicate specific forms. These average times were then used to calculate a weighted average of the number of respondents (application receipts) for each form to account for differing amounts of time required to adjudicate a particular form. For forms that were not measured during the T&M study, no adjudication time multiplier was applied to the estimated number of respondents (hence the 1.0 value assigned to the multiplier). The weighted averages were then converted into percentages and multiplied by the total estimated salary and total number of hours spent on adjudication tasks for passport specialists to arrive at the cost and time required to process each form. The total estimated salary is based on the existing ratio of grade levels at each passport agency and locality pay; the total number of hours is adjusted to reflect time spent only on adjudicative tasks.

Therefore, the DS-64 passport specialist adjudication cost is calculated as follows:

1.0 (adjudication time multiplier) x 527,334 (respondents) / 22,643,194 (total weighted average of respondents, all PPT forms) x \$85,483,755 (total passport specialist salary) = **\$1,990,819**

Or using numbers only,

$[(1.0 \times 527,334) / (22,643,194)] \times \$85,483,755 = \mathbf{\$1,990,819}$

With regard to the material costs (use of office supplies, printing, overhead, etc.) incurred by the passport specialist when adjudicating the DS-11, the Department has determined these costs to be negligible.

Therefore, the total cost to the Government is:

\$7,920 (contractor) + **\$1,990,819** (passport specialist adjudication) = **\$1,998,739**

15. The yearly projected numbers of DS-64 respondents are based on demand forecast numbers from statistical models and historical trends of form usage. The primary driver for form usage is the demand forecast for each fiscal year. DS-64 use is expected to increase steadily in correlation with the number of passport applications received estimate through FY 2018 as shown in the Projections table below.

Fiscal Year	Projections*		
	FY16	FY17	FY18
Total Projected Passport Applications	16,000,000	20,000,000	20,000,000
DS-64	452,000	565,000	565,000

*(estimates as of May, 2015)

The following changes have been made to the form (no questions were removed or added, content was rearranged for better flow and instructions were modified for clarity):

Item 1 – The color of the form was changed from blue to purple.

Item 2 – The “How To Report a Lost/Stolen Passport Book and/or Card” section was completely revamped in an attempt to simplify and call the applicant’s attention to the more pressing matters.

Item 3 – The “Important Notice” section was revised in an attempt to simplify the language and include a warning that multiple losses may lead to a limited validity replacement passport.

Item 4 – The “2. Lost or Stolen Passport Book/Card Information” was rearranged in an attempt to put questions that the applicant would have an easier time answering up front thereby making the form easier for the applicant to fill out.

The Department estimates that these few changes will not result in an increase in the current burden time of 10 minutes.

The decrease in respondent costs is due to the decrease in number of respondents.

16. This collection of information will not be published for statistical use.

17. The expiration date for OMB approval will be displayed.

18. No exceptions to the certification statement are being requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.