

## July 2014 Department of State Retrospective Review of Rules Supplement

As required by Executive Order 13610, *Identifying and Reducing Regulatory Burdens*, the Department of State publishes a semiannual report on the status of its retrospective regulatory review efforts. This report describes progress, anticipated accomplishments and proposed timelines for relevant actions, with an emphasis on the following:

1. those initiatives that will produce significant quantifiable monetary savings or significant quantifiable reductions in paperwork burdens while protecting public health, welfare, safety, and our environment;
2. initiatives that would reduce unjustified regulatory burdens, or simplify or harmonize regulatory requirements imposed on small businesses; and
3. the cumulative effects of Department regulations.

In March 2014, the Government Accountability Office (GAO) released a report (GAO-14-268) suggesting certain improvements to strengthen linkages to performance goals and to make information more useful to the public, among other things. In response to that report, one step the Department of State has taken is to publish this supplement as a companion to the semiannual report required by Executive Order 13610. The purpose of this supplement is to fill in information gaps, making the reported information more useful to the public by providing the detail and background that the public would need in order to have a more complete understanding of the action being taken. Each of the below items directly correspond with the items on the semiannual report.

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**RIN:** 1400-AC90

**Title** Revision of USML Category I (Firearms)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President's Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule, and will likely fall approximately six months after the publication date.

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**RIN:** 1400-AD05

**Title:** Revision of USML Category II (Guns and Armament)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President’s Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry’s reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule, and will likely fall approximately six months after the publication date.

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**RIN:** 1400-AD04

**Title:** Revision of USML Category III (Ammunition and Ordnance)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President’s Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry’s reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule, and will likely fall approximately six months after the publication date.

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**RIN:** 1400-AD25

**Title:** Revision of USML Category XI (Military Electronics)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President’s Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** This rule will be effective on December 30, 2014.

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**RIN:** 1400-AD32

**Title:** Revision of USML Category XII (Fire Control Equipment, etc.)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President's Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule, and will likely fall approximately six months after the publication date.

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**RIN:** 1400-AD03

**Title:** Revision of USML Category XIV (Toxicological Agents, etc.)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President's Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule, and will likely fall approximately six months after the publication date.

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**RIN:** 1400-AD35

**Title:** Revision of USML Category XV (Spacecraft Systems)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President's Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** This rule will be effective November 10, 2014, except for § 121-1, Category XV(d), which became effective June 27, 2014.

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**RIN:** 1400-AD35

**Title:** Revision of USML Category XVIII (Directed Energy Weapons)

**Summary:** This rule updates the referenced category of the U.S. Munitions List to implement revised control text pursuant to the President's Export Control Reform (ECR) initiative.

**Background:** The primary impact of this rule, consistent with the objectives of ECR, is to migrate certain items and technology from the U.S. Munitions List to the Commerce Control List maintained by the Bureau of Industry and Security at the Department of Commerce.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for items over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule, and will likely fall approximately six months after the publication date.

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**RIN:** 1400-AC80

**Title:** Revision to definition for defense service

**Summary:** This rule updates the referenced definition in the International Traffic in Arms Regulations.

**Background:** The primary impact of this rule is to make clearer the activities and scenarios that constitute defense services and give rise to the need to prepare an agreement under Part 124 of the ITAR.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for activities over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule.

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**RIN:** 1400-AD41; 1400-AD62

**Title:** Central African Republic Policy Update

**Summary:** These rules update the referenced policy provision in the International Traffic in Arms Regulations.

**Background:** The primary impact of these rules is to bring the policy set forth in the ITAR into alignment with recent UN Security Council resolutions affecting defense trade with the Central African Republic.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing these rules. The rules are required pursuant to obligations as a member of the United Nations.

**Implementation Benchmarks/Timelines:** The first rule became effective April 17, 2014. The publication date for the second rule is TBD. The effective date will be set forth in the published rule.

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**RIN:** TBD

**Title:** Movement of definitions

**Summary:** This rule reorganizes certain definitions found in the International Traffic in Arms Regulations.

**Background:** The primary impact of this rule is to migrate certain definitions from Part 121 of the ITAR to Part 120. The intent is to make the ITAR more user-friendly by containing definitions within one part of the ITAR, to the extent possible.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through consolidation of definitional language into one part of

the ITAR, thus providing ease of use for industry as well as reducing the risk of unintended violations of the ITAR as well as the fines and penalties that ensue.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule.

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**RIN:** TBD

**Title:** Revisions of definitions of technical data, public domain, and export

**Summary:** This rule reorganizes certain definitions found in the International Traffic in Arms Regulations.

**Summary:** This rule updates the referenced definitions in the International Traffic in Arms Regulations.

**Background:** The primary impact of this rule is to make clearer the forms of information that are covered by the above-referenced definitions. This has ramifications for industry in that technical data is controlled by the export control provisions of the ITAR, whereas public domain information is not.

**Methodology:** The Department did not employ cost-saving estimate methodology in preparing this rule. Cost savings will accrue through industry's reduced need to request export licenses from the Department for information over which we no longer exercise control.

**Implementation Benchmarks/Timelines:** The publication date for this rule is TBD. The effective date will be set forth in the published rule.

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**RIN:** 1400-AC82

**Title:** Subpart A

**Summary:** The rule amends the general administrative provisions governing the Exchange Visitor Program implemented by the Bureau of Educational and Cultural Affairs.

**Background:** The rule makes a number of technical changes to the general requirements for Exchange Visitor Programs, including providing more specific filing requirements for entities seeking to become designated sponsors, consolidating the previous Subpart F on SEVIS into Subpart A, and removing the former Appendices A-D, thereby collecting that information in a shorter manner through Forms DS-3036, DS-3037 and DS-3097.

**Methodology:** In response to public comments, the Department removed the requirement for sponsors to collect a Dun & Bradstreet number on the organization and all affiliated third parties, which would have been a substantial cost to private sector program sponsors.

**Implementation Benchmarks/Timelines:** Subpart A has been under consideration by the OMB and changes have been made to the text based on OMB comments. We hope to promulgate Subpart A as a Final Rule by Fall 2014.

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**RIN:** 1400-AC60

**Title:** Teacher Rule

**Summary:** The Department amends in final form existing regulations governing the teacher category of the Exchange Visitor Program.

**Background:** The Department of State strengthened the cultural component of the teacher program, changed teacher eligibility requirements, strengthened English language screening, provided for improved fee transparency, and made more precise required sponsor recordkeeping and reporting requirements.

**Methodology:** Obtained public comment on provisions in the rule in order to limit the administrative burden on sponsors.

**Implementation Benchmarks/Timelines:** Proposed rule was published in spring 2013; Final rule is expected to be published by early fall 2014.

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**RIN:** 1400-AC82

**Title:** Au Pair Rule

**Summary:** The Department is seeking to amend existing regulations governing the au pair category of the Exchange Visitor program.

**Background:** The Department of State currently requires families hosting an exchange visitor as an au pair to facilitate the au pair's requirement to enroll in and attend a post-secondary school while working as an au pair. The Department is proposing to redefine the educational component of the au pair program and provide a wider option of methods in meeting the educational requirement.

**Methodology:** The Department will seek public comment on how to minimize the burden of the revised regulation on the sponsors implementing the program.

**Implementation Benchmarks/Timelines:** The NPRM is expected to be published by fall 2014.

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**RIN:** 1400-AD54

**Title:** Procedures for Review of Certain Denials and Revocations

**Summary:** This proposed rule provides various changes and updates to 22 CFR Part 51. The proposed rule incorporates statutory passport denial and revocation requirements for certain convicted sex offenders as codified at 22 U.S.C. 212a. It clarifies that, notwithstanding the legal bases for denial or revocation of a passport, the Department may issue a passport for direct return to the United States. It confirms the Department’s authority to revoke Consular Reports of Birth Abroad. Finally, the proposed rule clarifies the rules relating to the conduct of hearings.

**Background:** A person whose passport has been denied or revoked under certain provisions of 22 CFR Part 51 is entitled to an administrative hearing to review the basis for the denial or revocation. The proposed rule simplifies and clarifies the administrative hearing process.

**Methodology:** N/A

**Implementation Benchmarks/Timelines:** Based on recent legal guidance, the proposed rule will be revised and resubmitted for Department of State review, with a target date for publication of April 2015.

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**RIN:** 1400-AC44

**Title:** 22 CFR Part 71 - Protection and Welfare of Citizens and Their Property

**Summary:** The proposed rule would reorganize, restructure, and update the consular regulations at 22 CFR Part 71 regarding the protection and welfare of U.S nationals abroad, would incorporate basic principles and practices regarding emergency financial assistance programs for U.S. citizens abroad, and would define eligibility for such programs, for Overseas Citizens Services “Trust” deposits, and for emergency evacuation loans.

**Background:** Most of the current consular protection regulations in 22 CFR Part 71 were issued in 1957 and in 1977. The Department believes that it would be beneficial for the regulations to be modernized and restructured to make them easier for users to access the information, to better reflect changes in statutory authority and current practice, to remove outdated provisions, and to clarify eligibility for Departmental loan programs, in particular emergency financial assistance programs for U.S. citizen prisoners abroad and for destitute U.S. citizens abroad seeking repatriation to the United States.

**Methodology:** Once the proposed rule is redrafted and finalized, the Bureau of Consular Affairs would then be able to calculate potential cost savings.

**Implementation Benchmarks/Timelines:** This rule is pending full re-clearance and final Department of State review with the goal of publishing the rule by December 2015.

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**RIN:** 1400-AD31

**Title:** 22 CFR Part 193 - Benefits for Hostages in Iraq, Kuwait, or Lebanon

**Summary:** In accordance with Executive Order 13563 of January 18, 2011, which addresses agency review of existing regulations, including those that may be outmoded or ineffective, the Bureau of Consular Affairs is repealing the regulations benefits for hostages in Iraq, Kuwait, or Lebanon. The current regulations, which relate to hostage benefits for U.S. nationals in Iraq, Kuwait, or Lebanon, were established in 1990; these regulations are outdated, as the program funding has been eliminated.

**Background:** The Department of State is working to repeal 22 CFR Part 102 because authorization to obligate funds under Section 599C of Public Law 101-513 expired on May 5, 1991.

**Methodology:** The Department of State does not anticipate any cost savings associated with this rule. The current regulations at 22 CFR Part 193 do not impose a financial burden on the Department.

**Implementation Benchmarks/Timelines:** This rule is pending internal Department of State review.

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**RIN:** 1400-AD55

**Title:** 22 CFR Part 102 - Civil Aviation United States Aircraft Accidents Abroad

**Summary:** In accordance with Executive Order 13563 of January 18, 2011, which addresses agency review of existing regulations, including those that may be outmoded or ineffective, the Bureau of Consular Affairs is repealing the regulations on civil aviation. The current regulations, which relate to civil aircraft accidents abroad and were promulgated in 1957, are highly outdated and duplicative of other authorities, including subsequent statutes, regulations, and Department of State guidance that specify detailed, modern, comprehensive, and effective procedures for dealing with foreign civil aircraft disasters.

**Background:** The Department of State is working to repeal 22 CFR Part 102 because it is outdated and duplicative of other federal laws, regulations, and guidelines that provide modern, comprehensive, and detailed instructions and information for consular officers dealing with civil aviation disasters abroad involving U.S. citizens, in particular the Aviation Security Improvement Act of 1990, Public Law 101-604; 22 CFR part 72 on Deaths and Estates; 7 Foreign Affairs Manual (FAM) 1800 on Consular Crisis Management, 7 FAM 1830 on Aviation and Other Transportation Disasters, and 7 FAM 1880 titled At the Focal Point of a Disaster.

**Methodology:** The Department of State does not anticipate any cost savings associated with this rule. The current regulations at 22 CFR Part 102 do not impose a financial burden on the Department.

**Implementation Benchmarks/Timelines:** This rule is pending internal Department of State review. The State Department will also ask FAA and NTSB to review this rule before it is sent to OMB on or around December 2014.

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**RIN:** 1400-AD30

**Title:** 22 CFR 41.2 - Exemption or waiver by Secretary of State and Secretary of Homeland Security of passport and/or visa requirements for certain categories of nonimmigrants – Individual cases of unforeseen emergencies

**Summary:** This Notice of Proposed Rulemaking revises an existing regulation to comply with a court decision in *United Airlines, Inc. v. Brien*, 588 F.3d 158 (2d Cir. 2009), requiring joint action between the Department of Homeland Security and the Department of State in promulgating a rule that allows for waiver of the visa and passport requirement for nonimmigrants in unforeseen emergencies.

**Background:** The Second Circuit’s decision in *United Airlines, Inc. v. Brien* found that the Department of Homeland Security and the Department of State had failed to act jointly in promulgating separate rules allowing for waiver of the visa and passport requirements for nonimmigrants in cases of unforeseen emergencies. This rule corrects a procedural aspect of State’s promulgation of 22 CFR 41.2(j) by State and DHS publishing a rule in parallel that clearly establishes the necessary joint action.

**Methodology:** The Department did not calculate savings estimates as it is not responsible for admitting foreign nationals under this provision, an exclusive authority of the Department of Homeland Security.

**Implementation Benchmarks/Timelines:** Publication of Notice of Proposed Rulemaking targeted for September 1, 2014, pending completion of DHS parallel rule.

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**RIN:** 1400-AD29

**Title:** 22 CFR 41.59 - Professionals under the North American Free Trade Agreement

**Summary:** This rule amends an existing Department regulation 22 CFR 41.59 to incorporate current policy by eliminating the numerical limit of Mexican nationals who may enter the United States as professionals through the North American Free Trade Agreement (NAFTA). Additionally, the rule revises current regulations for consistency with those promulgated by DHS to remove the requirement that these applicants submit a petition to U.S. Citizenship and Immigration Services (USCIS) before applying for a visa. These revisions implement commitments made by the United States through NAFTA and a subsequent exercise of authority by the Secretary of Homeland Security in 2004 to eliminate the annual limitation and petition requirement.

**Background:** These revisions implemented by this rule reflect commitments made by the United States through NAFTA and a subsequent exercise of authority by the Secretary of Homeland Security in 2004 to eliminate the annual limitation and petition requirement.

**Methodology:** Although the Department did not calculate savings estimates, this amendment benefits citizens of Mexico seeking temporary entry to engage in professional business activity

by streamlining the visa application process, thereby facilitating legitimate travel to the United States and benefiting the U.S. economy in the spirit of the agreement.

**Implementation Benchmarks/Timelines:** Final rule published in the *Federal Register* on February 10, 2014.

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**RIN:** 1400-AD52

**Title:** 22 CFR 42.11 - Classification symbols

**Summary:** This final rule amends the immigrant visa classification table listed in Department regulations to add a symbol for an immigrant visa issued to an alien who: is the parent of a current U.S. citizen, or the parent of a former U.S. citizen who, within the two-year period prior to filing the petition, lost or renounced U.S. citizenship status related to an incident of domestic violence or died; is a person of good moral character; is eligible to be classified as an immediate relative under the Immigration and Nationality Act; resides, or has resided, with the U.S. citizen daughter or son; demonstrates that he or she has been battered or subject to extreme cruelty by the U.S. citizen daughter or son; and has an approved petition from the Department of Homeland Security.

**Background:** Section 204(a)(1)(A)(vii) authorizes this immigrant visa status, which the Department previously identified such applicants using the “IR5” symbol, an existing symbol used for parents of U.S. citizens who are at least 21 years old.

**Methodology:** Although the Department did not calculate savings estimates, creating the unique “IB5” symbol clarifies the visa classification for the public and allows the Department to more readily and efficiently identify applicants for such status in various immigrant visa information databases.

**Implementation Benchmarks/Timelines:** Final rule published in the *Federal Register* on June 5, 2014.

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**RIN:** 1400-AD61

**Title:** Repeal of 22 CFR 13.3 -- Liability for neglect of duty or for malfeasance generally; action on bond; penalty

**Summary:** The Department of State is repealing the regulation that provides for personal liability for Consular Officers in cases of malfeasance. The current regulation, which was promulgated in 1957 and last amended in 1984, is no longer authorized by statute.

**Background:** This rule removes 22 CFR 13.3 from the Code of Federal Regulations. 22 CFR 13.3 provides that consular officers who willfully neglect or fail to perform any duty imposed on them by law shall be found liable to all persons injured by any such neglect, or omission, malfeasance, abuse, or corrupt conduct. 22 CFR 13.3 also provides for criminal penalties for consular officers found guilty for malfeasance and corrupt conduct in office. The Department is removing 22 CFR 13.3 because the rule’s authorizing statute has been repealed.

**Methodology:** There is no estimated cost savings to the Department. Currently, 22 CFR 13.3 does not impose a financial burden on the Department.

**Implementation Benchmarks/Timelines:** Initial review by OMB determined that the rule was non-significant. This rule is pending final Department of State review with the goal of publishing the rule by September 2014.

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**RIN:** 1405-0020

**Title:** Bureau of Consular Affairs – U.S Passport Renewal Application for Eligible Individuals

**Summary:** The Bureau is in the process of establishing a long term vision for future consular services, of which an online renewals process for U.S. passports is a key element. The Bureau, taking the lessons learned from the online Application for Passport Card (OAPC) pilot, will establish an online application for passports and cards. The online renewal process would allow an applicant to:

- select service type (routine or expedite service);
- pay for service (credit card or debit card);
- provide application data and photograph;
- provide identity and citizenship proof;
- select delivery (priority mail or overnight delivery service);
- provide electronic signature;
- submit application; and
- receive processing notifications via email.

**Background:** Renewals represent approximately 28 percent of the Bureau of Consular Affairs, Passport Services' (CA/PPT) total workload each year, and lockbox applications account for 88 percent of renewals each year. Based on historical analysis, 76 percent of applicants renew their passports between 10 and 13 years after their previous passport was issued. The Department expects renewal rates to increase significantly by FY 2017 to 5.6 million passports; however, from FY 2013 through FY 2016, the Department also projects a renewal range of 3.9 to 4.5 million a year.

**Methodology:** Public reporting burden for the current collection of information (paper DS 82) is estimated to average 40 minutes per response, including the time required for searching existing data sources, gathering the necessary data, providing the information and documentation required, and reviewing the final collection. Based on the simplified electronic submission, it is estimated that the public reporting burden could be reduced by 10 minutes.

- Current Public Burden (40 minutes) based on 4 million respondents equals 2.7 million hours.
- Estimated Public Burden (30 minutes/submission) based on 4 million respondents equals 2.0 million hours.
- **Estimated Public Burden reduced by 25%.**

**Implementation Benchmarks/Timelines:** Substantial work within the technical, policy, and administrative arenas are necessary, but if the needed resources were allocated, the Department would have the capability by the end of CY 2015 to meet and process the increased DS 82 receipts effectively.

Duration: 15-21 months

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**RIN:** 1405-0014

**Title:** Consular Affairs - Statement Regarding a Lost or Stolen Passport

**Summary:** A passport bearer is required to submit a Statement Regarding a Lost or Stolen Passport, form DS-0064, after a loss or theft has taken place even if the bearer does not apply for a new passport. This initiative will make the option of reporting a passport loss or theft more convenient for the public and make processing the reports more efficient through the implementation of an electronic form submission.

**Background:** Currently, U.S. citizens only have the ability to submit a DS-0064 by mail. Providing an electronic option to submit the DS-0064 saves both the customer and the Department time. Once the electronic form is submitted online, it is transmitted directly to the Department's Consular Lost and Stolen Passport (CLASP) Unit so that the passport can be invalidated immediately. The CLASP clerk only needs to verify the data received and process the request- instead of having to enter the complete record.

**Methodology:** Formula:  $122,500 \text{ respondents} \times (3/60) = 6,125 \text{ hours}$ , which is a reduction of 4,083 hours from the current 10,208. Note: The burden per respondent was reduced from 5 minutes to 3 minutes. This is an estimate. 122,500 was the estimated number of users at the time.

Savings for customers: \$30,625 per year.

Formula: If 25% of 122,500 respondents use the online version, at a savings of \$1-2 per form, the savings would be in the range of \$30,625-\$61,000. This is an estimate.

**Implementation Benchmarks/Timelines:** The implementation of a pilot for this new electronic process has a target date of January 2015.