

**Author Full Name :** Anonymous**Received Date :** 02/19/2025 10:44 PM**Comments Received :**

I worry this change to the State Department Passport Renewal form will have a variety of effects on the ability of the Department of State to facilitate commerce, conduct diplomacy with foreign nations, and provide efficient services to the taxpayer. Furthermore, I fear this change is made in contravention of several court rulings, federal laws, and other federal regulations.

This change will deny transgender, intersex, or other gender ambiguous or non-conforming Americans the ability to appropriately participate in foreign commerce that may be of benefit to the United States and may Serve DoS or USG interests.

The inability of certain classes of law abiding Americans may harm the U.S.'s ability to conduct diplomacy, especial in the areas of cyber security and information technology where specialists will be unable to receive passports based on their updated birth certificates to travel and conduct USG business. Furthermore, this may expose the Administration to sanctions from liberal democratic regimes that seek to upload the liberties of individuals for self expression that would be hindered by this form change.

This form change will cost taxpayers dearly in man hours, paperwork reviews, frivolous investigations, and unnecessary lawsuits as the practice of determining sex can be an expensive and difficult one, especially as the biomarkers for sex can change over an individuals lifetime, are not always accurately recorded, may be recorded fraudulently to harm individuals, or may otherwise be muddled.

I fear these changes run afoul of the paperwork reduction act and are not clear to the tax payer. The potentially have extensive privacy act implications regarding PII and PHI which DoS systems are not prepared to handle.

Additional investigations should be made as to whether these changes might endanger covers of intelligence officers and foreign service officers acting abroad, whether these changes may adversely impact the process for obtaining suitability and clearance for access to national security information (which frequently requires a passport), and how the DoS intends to mitigate those impacts. Report should likely be written at the TS/SCI level and be appropriately circulated within the intelligence community to ensure IC buy in.

This form change fails to consider the potential downstream impacts on federal contracts already bound and executed that rely on processing information on the current DoS passport form. Efforts should be made to deconflict this change with CORs across the government and ensure this will not impact this contracts.

This form change has the potential to alter SORN notices for systems that rely on passport data. Appropriate investigation should be conducted to ensure this does not invalidate existing SORNs and update SORNs before conducting the change. Finally, these changes violate the implied rights guaranteed to all Americans in Title VII of the Civil Rights Act as held in *Bostock v. Clayton County* (2020, SCOTUS).