



NATIONAL FEDERATION OF FEDERAL EMPLOYEES

Affiliated with the International Association of Machinists and Aerospace Workers, AFL-CIO
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December 17, 2008

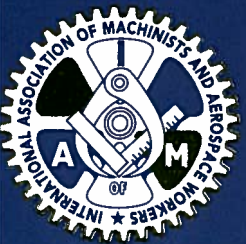
Ambassador Joe Huggins
Presidential Transition Team
United States Department of State
2201 C Street, NW
Room 1210A
Washington, D.C. 20520

Dear Sir:

On behalf of the National Federation of Federal Employees (NFFE), the certified exclusive representative of over 100,000 men and women working in the federal sector, and NFFE Local 1998, representing 1,400 bargaining unit employees of Passport Services, which is part of the Department of State's Bureau of Consular Affairs, we submit the following issues of concern facing our membership. This letter highlights two issues relating to the integrity of the passport issuance process for the Presidential Transition Team's consideration: 1) production quotas for the adjudication of passport applications and 2) the use of contractors to perform the passport application acceptance/execution function.

Regarding numerical standards and production quotas, due to high hourly production quotas unilaterally imposed by management, NFFE and our members have had the longstanding concern that Passport Specialists have insufficient time to diligently and fully adjudicate passport applications in order to detect and prevent passport fraud. Stressing production quantity over quality risks erroneous issuance of passports to criminals who commit passport fraud, and who may be connected to other crimes. This vulnerability results from insufficient time and focus on fraud prevention in the passport adjudication process. In surveys of Passport Specialists by NFFE, 94% indicated they do not have enough time to detect passport fraud while processing applications and 97% stated that the focus in their jobs is on the quantity of passport issued rather than the quality of our work.

Regarding the use of contractors to perform the passport application/execution function, we find that this practice creates a significant vulnerability that jeopardizes the application process. The person accepting the passport application is, literally, the eyes and ears of the Department of State. Thus when the Secretary of State certifies, in a passport, that the bearer is who he/she claims to be, that identification springs directly from the



functions of the accepting official. The State Department has traditionally considered the acceptance of passport applications inherently governmental, only allowing this function to be performed by city, county and federal government workers. However, due to the Department's inability to manage its workload in 2007, it unilaterally changed this classification and 22 CFR 51.22(a)(4) without warning and potentially contrary to law.

Additionally, we attach a copy of 2005 Government Accountability Office (GAO) report 05-477, "Improvements Needed to Strengthen U.S. Passport Fraud Detection Efforts," which underscores the need to strengthen our practice in preventing passport fraud. We draw your attention in particular to the Report's recommendations for Executive Action on pages 32 and 33. The Report proposes to increase training in fraud detection, and to assess the effect of workload transfers on fraud detection as well as to increase staffing for the specific function of fraud prevention. This report resulted from an investigation spurred by NFFE's repeated efforts and complaints regarding the fraud detection process.

We thank you for the opportunity to present our view. We remain available to you to respond to your comments or questions.

Very truly yours,



Richard N. Brown
National President
NFFE



Colin Patrick Walle
Local President
NFFE Local 1998