

SUPPORTING STATEMENT

Registration for Classification as Refugee

(Form I-590)

OMB No. 1615-0068

A. JUSTIFICATION:

1. Section 207 of the Immigration and Nationality Act (Act) provides for the admission of refugees into the United States. Procedures for admission of refugees into the United States are contained in 8 CFR 207.2(a). The annual refugee admission ceiling is set by the President in consultation with Congress. A refugee is defined in section 101(a)(42) of the Act.
2. Form I-590 provides a uniform method for applicants to apply for refugee status and contains the information necessary to adjudicate such applications. Without the use of this form, processing of refugees would be delayed and could result in non-compliance with the Act.
3. ~~3. —~~The use of this form provides the most efficient means for collecting and processing the required data. In this case U.S. Citizenship and Immigration Services (USCIS) ~~doesn't not~~ employ the use of information technology in collecting and processing information. This form has been scheduled for e-filing as part of the Business Transformation Project. The use of this form provides the most efficient means for collecting and processing the required data. ~~In this case U.S. Citizenship and Immigration Services (USCIS) doesn't employ the use of information technology in collecting and processing information. This form has been scheduled for e-filing as part of the Business Transformation Project.~~—USCIS is embarking on an enterprise-wide

“Transformation Program” that will transition the agency from a fragmented, paper-based operational environment to a centralized and consolidated environment, utilizing electronic adjudication. The Program is a large-scale, complex undertaking that will form the foundation of USCIS-wide business processes and Information Technology (IT) enabled re-engineering. The new operational environment will employ the types of online customer accounts used in the private sector in order to facilitate transactions, track activities, and reduce identity fraud. The revised processes will also help the agency to meet customer expectations for on-demand information and immediate real-time electronic service over the Internet. Assumptions are defined as future situations beyond the control of the Transformation Program, whose outcomes affect the development and operation of the new or modified system. The TPO has identified the following assumptions:

- A. Congress will continue to support the agency in its transformation efforts.
- B. The Office of Management and Budget (OMB) will endorse the USCIS requirement for exclusive electronic filing and submission of documents. Otherwise, USCIS must provide for data entry, document imaging, and payment processing facilities, reducing functionality only possible with online transactions.
- C. Temporary Worker Program (TWP) legislation will pass within two years. The system is being designed to accommodate a TWP as another product line whose functions will be in keeping with the components of other processes.
- D. Statutory, regulatory, and procedural changes will continually be made to immigration benefits, such as changes being made for orphans, religious workers, and naturalization applicants, and new categories for trafficking victims.

- E. DHS will impose standards for enumeration and support for biometric verification under the Unique Identity Initiative.
- F. USCIS will have the network capacity and technology infrastructure to deploy a publicly accessible web-centric environment.
- G. USCIS will complete a web portal project, including a module by which an online customer can be directed to the appropriate customer transaction type. Once the customer has selected a transaction type, the Transformation web tools will then take the customer through the remaining process.
- H. Private entities are willing to make a business of facilitating, for USCIS customers, the gathering and uploading of customer electronic data, images and payment for upload to USCIS systems using publicized USCIS standards published.
- I. Services for the intake of biometrics, for the background checks, and for production and delivery of secure identity documents will be provided by other components of USCIS, whether directly, through contract, or through privatized arrangements. The new operational concept must accommodate existing and more privatized delivery systems for such services and must ensure that background checks and biometric enrollment are secure through validation and government involvement.
- J. Partner agencies will be able to access USCIS customer account data using web enabled tools as needed.

Constraints

Constraints are defined as impositions on the future operational concept, because of conditions beyond the control of the Transformation Program. The TPO has identified the following constraints:

- A. Government regulations relating to the submission of information, Systems of Records Notice, Privacy Act, and Paperwork Reduction Act.
- B. Funding levels to support incremental development and deployment.
- C. Implementation of IT infrastructure upgrade and enhancements within USCIS.
- D. The volume beneficiaries under the TWP may require new channels of enrollment ranging from expansion of Application Support Centers, to the addition of privatized enrollment options or some combination.
- E. The solution must be able to interface with both internal and external systems including:
 - USCIS and DHS legacy systems, including:
 - Computer Linked Application Information Management System 3 (CLAIMS 3)
 - Computer Linked Application Information Management System 4 (CLAIMS 4)
 - Central Index System (CIS)
 - Reengineered Naturalization Application Casework System (RNACS)
 - Service Request Management Tool (SRMT)
 - Fraud Detection National Security (FDNS)
 - Marriage Fraud Amendment System (MFAS)
 - Refugee Asylum Processing System (RAPS)
 - Deportable Alien Control System (DACs)
 - Freedom of Information Processing System (FIPS)
 - Verification Information System
 - Treasury Enforcement Computer System (TECS)
 - Interagency Border Inspection System (IBIS)
 - Student and Exchange Visitor Information System (SEVIS)

- o Treasury Enforcement Computer System (TECS)
- Partner Agency Systems (DOJ, DOS, DOL, etc.)

4. A review of USCIS Forms Inventory Report revealed no duplication of efforts. There is no similar information currently available that can be used for this purpose.
5. This collection of information does not have an impact on small businesses or other small entities.
6. Section 101(a)(42) of the Act defines a refugee as a person having a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. Form I-590 provides the information necessary to determine an applicant's claim as a refugee. If the collection of information is not conducted, USCIS could not identify those refugees eligible for admission to the U.S. pursuant to section 207 of the Act. Furthermore, it could result in non-compliance with the Act.
7. There are no special circumstances applicable to this information collection.
8. USCIS published a notice on August 4, 2006 at 71 FR 44305. The notice allowed 60 days for public review and comment. USCIS received no public comments on this proposed information collection.
9. USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.

- 10. There is no assurance of confidentiality.
- 11. There are no questions of a sensitive nature.

12. Annual Reporting Burden:

a.	Number of Respondents	140,000
b.	Number of Responses per Respondent	1
c.	Total Annual Responses	140,000
d.	Hours per Response	.583
e.	Total Annual Reporting Burden	81,620

Annual Reporting Burden

The total annual reporting burden hours are **81,620**. This figure was derived by multiplying the number of respondents (140,000) x frequency of response (1) x 35 minutes per response (.583). This estimate is based on prior USCIS experience with the program.

- 13. There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this information collection are identified in Item 14. *Additionally, there are no fee charges associated with the collection of this information.*

14. Annualized Cost Analysis:

a.	Printing Cost	\$ 25,200
b.	Collection and Processing Cost	\$ 4,200,000

c.	Total Cost to Program	\$ 4,225,200
d.	Fee Charge	0
e.	Total Cost to Government	\$ 4,225,200

Government Cost

The estimated cost to the Government is **\$4,225,200**. This figure is calculated by using the estimated number of respondents 140,000 x 45 Minutes (.75) (Time required to collect and process information) x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). In addition, this figure includes the estimated overhead cost for printing, stocking, and distributing the form, which is \$25,200.

Public Cost

The estimated annual public cost is **\$816,200**. This is based on the number of respondents 140,000 x 35 Minutes (.583) per response x \$10 (Average hourly rate).

- 15. There has been no increase or decrease in the number of burden hours previously reported for this information collection.
- 16. USCIS does not intend to employ the use of statistics or the publication thereof for this information collection.
- 17. USCIS will display the expiration date of OMB approval of this information collection.
- 18. USCIS does not request an exception to the certification of this information collection. See attached Item 19 of Form OMB 83-I.

B. Collection of Information Employing Statistical Methods.

Not Applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Richard A. Sloan
Director,
Regulatory Management Division,
U.S. Citizenship and Immigration Services,
Department of Homeland Security.

Date