

SUPPORTING STATEMENT

Sponsor's Notice of Change of Address, Form I-865

OMB No. 1615-0076

A. JUSTIFICATION:

1. The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 created section 213A of the Immigration and Nationality Act (Act). Section 213A(d)(1) of the Act requires every sponsor to notify the U.S. Citizenship and Immigration Services (USCIS) of his or her new address within thirty (30) days of any change of address. The sponsor will meet this obligation by filing this form with the USCIS.
2. The data collected on Form I-865 will be used by an entity that has provided any means-tested public benefit to a sponsored alien to locate and require reimbursement from the sponsor for an amount equal to the unreimbursed costs of the provided benefits.
3. The use of Form I-865 provides the most efficient means for collecting and processing the required data. In this case the USCIS does not employ the use of information technology in collecting and processing information. Currently, the USCIS does not have the automated capability in place to accept electronic submission of applications. However, this form has been designated for e-filing under the Business Transformation Project.
4. A review of the USCIS Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available which can be used for this specific purpose.

5. This collection of information does not have an impact on small businesses or other small entities.
6. If the information is not collected, providers would not have information on sponsors of aliens that may receive means-tested public benefits, and it may prove difficult to pursue the reimbursement of unreimbursed costs from sponsors.
7. There are no special circumstances associated with this information collection.
8. On February 5, 2007, USCIS published a 60-Day Notice at 72 FR 5300 allowing for public comment. No comments were received on this information collection.
9. The 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:**

No. of respondents	100,000
No. of responses per respondent	1
Total Annual Responses	100,000
Hours per response	.25
Total Annual Reporting Burden	25,000

The projected hours per response for this collection were derived by breaking the process into three basic components:

Learning about the law and form	5 Minutes
Completing the form	5 Minutes
Submitting the form	5 Minutes
Total Hours per Response	15 Minutes (.25 hours)

Annual Reporting

The total annual reporting burden hours are 25,000. This figure was derived by multiplying the number of respondents (100,000) x the frequency of response (1) x the hours per response (15 minutes or .25 hours).

13. There are no capital or start-up costs associated with this information collection. Any cost burden to respondents as a result of this collection is identified in item 14. There are no fee charges associated with the collection of this information.

14. **Annualized Cost Analysis:**

Printing Cost	\$ 18,000
Collecting and Processing	\$ 1,000,000
Total Cost to Program	\$ 1,018,000
Fee Charge	0
Total Annual Cost to Government	\$ 1,018,000

Government Cost

The estimated cost to the Government for the information collection is \$1,018,000.

This figure is calculated by using the estimated number of respondents (100,000) x government response time of

15 minutes (.25) x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). This figure also includes the estimated overhead cost for printing, stocking, and distributing the forms which is \$18,000.

Public Cost

The estimated annual public cost of this information collection is \$250,000. This figure is based on the number of respondents (100,000) x the response time of 15 minutes (.25 hours per response) x \$10 (average hourly rate).

15. There has been a decrease of 75,000 reporting burden hours for this collection of information. This can be attributed to USCIS mistakenly listing 1-hour for the time to complete the form rather than the actual 15 minutes to complete.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. USCIS will display the expiration date for this information collection.

USCIS does not request an exception to the certification of this information collection.

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,

Chief,

Regulatory Management Division,

U.S. Citizenship and Immigration Services.

Date