

SUPPORTING STATEMENT

Document Verification Request and Supplement

(Form G-845, Form G-845S and Supplement)

OMB No. 1615-0101

A. Justification.

1. Section 121 of the Immigration Reform and Control Act (IRCA), Public Law 99-603, provides authority for U.S. Citizenship and Immigration Services (USCIS), to maintain an automated system for verifying the immigration status of non-citizen applicants of certain types of federally-funded benefits, such as Food Stamps, Temporary Assistance to Needy Families, Unemployment Insurance, Medicaid, Housing Assistance, Education Grants, Loans and Work Study. The IRCA-mandated system must be accessible to federal, state and local benefit-issuing agencies and institutions that administer those federally-funded benefits.

Section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Public Law 104-208, requires USCIS to respond to inquiries by federal, state, and local benefit-issuing agencies and institutions seeking to verify or determine the citizenship or immigration status of any individual within the jurisdiction of the agency for any lawful purpose.

2. In the verification process, a participating agency validates an applicant's immigration status by inputting identifying information into the Verification Information System (VIS), which executes immigration status queries against a range of data sources (See attached screen shots). If VIS returns an immigration status and the benefit-issuing agency does not find a material discrepancy with the response and the documents provided by the applicant, the verification process is complete. Then, the agency may use that immigration status information in determining whether or not to issue the benefit.

If VIS does not have a record pertaining to the applicant, or if a material discrepancy between the data return from VIS in response to an initial verification and the data on the non-citizen's immigration document is noted by the benefit-issuing agency, a Form G-845 must be completed by the agency.

In some cases, agencies that do not access the automated verification system may query USCIS by filing Form G-845. There is also a document called the Form G-845S that was developed for use by only the agencies that administered the benefits mandated by IRCA. These agencies are the U.S. Department of Health and Human Services, U.S. Department of Labor, U.S. Department of Education, and U.S. Department of Housing and Urban Development. The distinction between the two forms is found at Section A.8 of each form. The Form G-845 has a blank space at Section A.8 for the requesting agency to identify the organization specific benefit(s). The Form G-845S has a list of the mandated

benefits from which the requesting agency may select and a blank for other benefits to be specified. Although neither the Form G-845 nor the Form G-845S requires it, if needed certain agencies may also file the Supplement with the Form G-845 or Form G-845S, with copies of immigration documents to receive additional information necessary to make their benefit determinations. These forms were developed to facilitate communication between all benefit-granting agencies and USCIS to ensure that basic information required to assess status verification requests is provided. USCIS is making minor revisions to the Form G-845 and Form G-845S and extending the Supplement with no changes. (See attached table of changes for the Form G-845 and Form G-845S).

3. Currently, USCIS allows for the electronic verification of the immigration status of non-citizen applicants of certain types of federally-funded benefits through the VIS (<https://www.vis-dhs.com/WebOne>). However, if a material discrepancy is noted by the benefit-issuing agency, then the Form G-845 (or Form G-845S) and possibly the Supplement is submitted in hard copy (along with the documents) to USCIS for verification.
4. A review of the 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. This information collection allows USCIS to quickly and uniformly respond to benefit-issuing agencies nationwide with a document that can be used as a record of the transaction. This process assists agencies in identifying applicants without immigration status and potentially those utilizing counterfeit documentation, to avoid granting benefits to those ineligible. Additionally, USCIS is provided an opportunity to update its database when the applicants produce appropriate documents that are not reflected in the database.
7. There are no special circumstances applicable to this information collection.
8. On March 4, 2008, USCIS published a 60-day notice in the Federal Register at 73 FR 11654. USCIS did not receive any comments for this 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:	G-845 and (S)	Supplement	VIS Query
a. Number of Respondents	260,026	128,072	9,850,134
b. Number of Responses per Respondent	1	1	1
c. Total Annual Responses	260,026	128,072	9,850,134
d. Hours per Response	.083	.083	.083
e. Total Annual Reporting Burden	21,582	10,630	817,561

Total annual reporting burden hours is 849,773. This total figure was derived as follows:

Form G-845 and G-845S. This figure was derived by multiplying the number of respondents (260,026) x frequency of response (1) x 5 minutes per response (.083).

Supplement. This figure was derived by multiplying the number of respondents (128,072) x frequency of response (1) x 5 minutes per response (.083).

VIS Query. This figure was derived by multiplying the number of respondents (9,850,134) x frequency of response (1) x 5 minutes per response (.083).

13. There are no capital or start-up costs associated with this information collection for Form G-845, Form G-845S or Supplement. However, there is a fee of \$.183 for conducting queries using the VIS. Any cost burdens to respondents as a result of this information collection are identified in Item 14.

14. <u>Annualized Cost Analysis:</u>	G-845 and S	Supplement	VIS Query
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a.	Printing Cost	\$ 15,602	23,053	0
b.	Collection and Processing Cost	\$ 2,600,260	2,561,440	1,800,000
c.	Total Cost to Program	\$ 2,615,862	2,584,493	1,800,000
d.	Fee Charge	\$ 0	0	1,800,000
e.	Total Cost to Government	\$ 2,615,862	2,584,493	0

Government Cost

The estimated cost to the Government is \$5,200,355. This figure was derived as follows:

Form G-845 and G-845S. This figure is calculated by multiplying the estimated number of respondents 260,026 x 15 minutes (.25) (USCIS 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 \$15,602.

Supplement. This figure is calculated by using the estimated number of respondents 128,072 x 30 minutes (.50) (USCIS 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 \$23,053.

Public Cost

The estimated annual public cost is \$10,300,305. This figure was derived as follows:

Form G-845. This figure is based on the number of respondents (260,026) x number of responses (1) x 5 minutes (.083) per response x \$10 (Average hourly rate).

Supplement. This figure is based on the number of respondents (128,072) x number of responses (1) x 5 minutes (.083) per response x \$10 (Average hourly rate).

VIS Query. This figure is based on the number of queries 9,850,134 x number of responses (1) x 5 minutes (.083) x \$10 (Average hourly rate); plus the number of queries 9,850,134 x the average fee per query of approximately \$.183.

15. Burden Hours: There has been an increase of 808,273 in the burden hours associated with this information collection. In previous submissions, USCIS would always report the number of respondents submitting the G-845, G-845S and the Supplement, but USCIS never reported the number of electronic queries conducted by the respondent prior to submitting the G-845, G-845S and Supplement for verification. USCIS previously submitted the screen shots of the Verification Information System for OMB approval along with the G-845, G-845S and Supplement but never accounted for the number of electronic queries. This submission corrects that oversight.

Costs: USCIS previously reported an annual cost to the public of \$20,045,000. This figure mistakenly included the Government cost and not the cost to the respondent. The cost of this information collection to the respondent is \$1,802,574 (9,850,134 queries x \$.183 per query). Accordingly, there has been a decrease in the cost to the public of \$18,242,426.

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 for this information collection.
18. 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.

Stephen Tarragon,

Acting Chief,

Regulatory Management Division.

U.S. Citizenship and Immigration Services,

Department of Homeland Security.

Date