

SUPPORTING STATEMENT

Generic Clearance of Customer Service Surveys

(File No. OMB-9)

OMB No. 1615-0077

A. Justification:

1. As mandated by Executive Order (E.O.) 12862 and in response to the requirements of the Government Performance and Results Act (GPRA), U.S. Citizenship and Immigration Services (USCIS) will conduct a number of surveys (both qualitative and quantitative) designed to determine the kind and quality of services our customers want and expect, their level of satisfaction with our existing services, and the type of services which they project may be required within a 3 to 5 year time frame. According to instructions from the Office of Management and Budget (OMB), these surveys will be limited to data collections that solicit strictly voluntary opinions, and will not collect information that is required or regulated.

2. USCIS will conduct various customer satisfaction activities to meet the requirements of E.O. 12862, to provide improved services, and to enhance our strategic planning capabilities. The information collected will be used by USCIS to determine where and to what extent services need to be improved or developed. These surveys may lead to policy changes to enhance or streamline the overall operations of USCIS and to modify its strategic planning objectives and/or customer service standards.

The USCIS will conduct various surveys, focus groups, and stakeholder sessions of customers, primarily at ports of entry, Headquarters or field offices, business locations, on the telephone, or through Web surveys and mailings. USCIS will be seeking customer feedback on issues, which include:

- Information and forms for immigration benefits and publications distributed by USCIS related to incorporation of new immigrants;

- Applications for USCIS employment;
- Applications for temporary or permanent residency, adjustment of status, waivers, entry/reentry, refugee travel documents, or naturalization; customers who seek information telephonically; persons who are verified electronically through USCIS programs
- Activities related to Federal, state or local agency verification of citizenship and immigration status, adjudicative, legislative, or benefit related responsibilities as they pertain to immigration matters;
- Large and small business concerns regarding adjudications of applications for workers and verification of status and participation in USCIS electronic employment verification programs;
- Activities within USCIS processing centers, Headquarters, regional, district, or specialized USCIS offices, and temporary or permanent posts of duty; and
- Service provided by staff of the USCIS, including those involved in verification, adjudicative, or administrative services.

Information contained thus far under the Generic Clearance Request has been used to identify areas of operation in need of procedural improvement, to re-engineer program efforts, and to initiate and assess customer satisfaction and effectiveness of pilot and new program endeavors to aid in improving overall performance.

3. Efforts to incorporate the use of electronic, automated, or other mechanical collection of information will be considered for each survey conducted under this generic clearance in order to reduce burden on the public.
4. USCIS has a central review and approval process for all surveys, which prevents duplication. A review of USCIS Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available that can be used for these purposes.

5. This collection does not have an impact on small businesses or other small entities.
6. This is the only way the USCIS has of carrying out the requirements of the E.O. 12862 aimed at improving services and ensuring that customer input is part of our Strategic Planning effort (GPRA).

These activities will provide our baseline and follow-up data to assist in identifying problem areas and services. They will also allow USCIS to better identify and assess key areas in which to make customer service improvements, and the degree to which improvements are needed. This request will also allow USCIS to conduct the appropriate type and number of surveys to make the necessary determinations of the quality of our customer service delivery.

The consequences of doing less would most probably equate to non-compliance with E.O. 12862 and result in USCIS' inability to most effectively perform its strategic planning effort under GPRA, including efforts that will allow us to address customer concerns related to both current immigration activities as well as emerging trends.

7. It is expected that there will be situations under this Generic Clearance Request in which respondents will be asked to return survey instruments within 30 days of receipt. The purpose of such requests would be to ensure that all responses are obtained in a timely fashion, thus allowing USCIS or its contractor(s) to assess the survey results and provide complete and timely analysis of the data. Responses to all collections under this generic clearance are voluntary, thus any individual who is not able to provide a response within the requested time period is not obligated to do so.
8. On September 18, 2007, OMB approved the Generic Clearance for 3 years until September 30, 2010. Since USCIS is only adding a survey instrument to this clearance USCIS did not publish a 60-day notice requesting comments from the public.

9. USCIS does not usually provide payments or gifts to respondents in exchange for responding to a survey under this generic clearance. However, on occasion, USCIS, through a contractor may offer a small remuneration to survey respondents to maximize response rates and defray the cost of participation when the survey requires significant time to complete.

10. Individuals and organizations contacted will be assured of the confidentiality of their replies under 42 U.S.C.1306, 20 CFR 401 and 422, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act) and OMB Circular No. A-130. The respondent is informed that their responses are voluntary and will be kept confidential and not shared with persons other than those working on the survey, and that their information will be used or published only with aggregate information from other respondents.

11. The USCIS does not anticipate including any questions of a sensitive nature in any of the surveys conducted under this generic clearance. The only exception that may be made regarding persons applying for USCIS employment is that involving a general question concerning the identification of one's status relative to a disability. In such a case, it would be necessary to solicit this information in order to assess and improve the DHS' human resources or service delivery efforts. Such questions would be in accordance with those allowed under 5 U.S.C. 7201.

12. Estimated Annual Reporting Burden:

(a) The following Customer Satisfaction Survey has been approved by OMB.

Customer Service Survey

a. Number of Respondents	15,000
b. Number of Responses per Respondent	1
c. Total Annual Response	15,000
d. Hours per Response	.50
e. Total Annual Reporting Burden	7,500

(b) The following E-Verify employment eligibility verification program survey for non users is new. See attached document.

a. Number of Respondents	2,500
b. Number of Responses per Respondent	1
c. Total Annual Response	2,500
d. Hours per Response	.333
e. Total Annual Reporting Burden	833

(c) The following E-Verify employment eligibility verification program survey for employers in Arizona is new. See attached document.

a. Number of Respondents	100
b. Number of Responses per Respondent	1
c. Total Annual Response	100
d. Hours per Response	2
e. Total Annual Reporting Burden	200

(d) The following E-Verify employment eligibility verification program survey for Employees of employers using E-Verify in Arizona is new. See attached document.

a. Number of Respondents	450
b. Number of Responses per Respondent	1
c. Total Annual Response	450
d. Hours per Response	1
e. Total Annual Reporting Burden	450

(e) The following Survey of Recently Naturalized Citizens is new. See attached survey questionnaire document.

a. Number of Respondents	7,500
b. Number of Responses per Respondent	1
c. Total Annual Response	7,500
d. Hours per Response	0.50
e. Total Annual Reporting Burden	3,750

Annual Reporting Burden

Total annual reporting burden hours are 12,733.

(a) Customer Service Survey: This figure was derived by multiplying the number of respondents (15,000) x frequency of response (1) x hours per response 30 minutes (.50).

(b) E-Verify Customer Service Surveys (nonusers): This figure was derived by multiplying the number of employers completing the survey electronically (2,500) x frequency of response (1) x hours per response (20 minutes).

(c) E-Verify Customer Service Surveys of Employers using E-Verify in Arizona, This figure was derived by multiplying the number of employers being interviewed (100) x the frequency of response (1) x hours per response (2 hours).

(d) E-Verify Customer Service Surveys of Employees of Employers using E-Verify in Arizona. This figure was derived by multiplying the number of employees being interviewed (450) x the frequency of response (1) x hours per response (1 hours).

(e) Survey of Recently Naturalized Citizens: This figure was derived by multiplying the number of employers completing the survey over the phone (7,500) x frequency of response (1) x hours per response for 30 minutes (.50).

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

14. **Annualized Cost Analysis:**

(a) Customer Service Survey

Printing Cost	\$	13,410
Collecting and Processing		586,590
Total Cost to Program		600,000
Fee Charge		0
Total Annual Cost to Government	\$	600,000

(b), (c), (d) E-Verify Customer Surveys

Contract Cost	\$	3,800,000
Federal Salaries and Expenses		100,000
Total Cost to Program		3,900,000
Fee Charge		0
Total Annual Cost to Government	\$	3,900,000

(e) Survey of Recently Naturalized Citizens

Contract Cost	\$	1,420,000
Federal Salaries and Expenses		40,000
Total Cost to Program		1,460,000
Fee Charge		0
Total Annual Cost to Government	\$	1,460,000

The estimated cost of the program to the Government is \$5,960,000.

(a) Customer Service Survey: This figure is calculated by multiplying the estimated number of respondents (15,000) multiplied by number of responses (1) multiplied by 1

hour per response (Time required to collect and process the information) multiplied by \$40 (suggested average hourly rate for clerical, officer, and managerial time with benefits). In addition, this figure includes the estimated overhead cost for printing, stocking, and distributing the survey which is \$13,410.

(b), (c), (d) E-Verify Customer Service Surveys: The base year study cost for Contract HSSCCG-08-F-00606 to Westat is estimated to cost the Federal government about \$3.8 million for contractual services. This includes labor costs and operational expenses, such as designing the studies, sample design and selection, recruiting participants, printing materials, programming the Web survey and the computer-assisted personal interviewing (CAPI) employer and employee interviews, training field interviewers, conducting interviews with employees and employers, coding responses, overhead, support staff, travel for site visits, costs for data processing, compiling secondary data, performing software tests, interviewing Federal and state officials, analysis, and preparing reports. In addition, an estimated cost of \$100,000 a year is required for Federal salaries and related expenses, making the total annualized project cost \$3.9 million.

(e) Survey of Recently Naturalized Citizens: The study cost for Contract HSSCCG-08-F-00636 to Abt/SRBI is estimated to cost the Federal government about \$1.42 million for contractual services. This includes labor costs and operational expenses, such as designing the study, sample design and selection, printing materials, programming the phone survey, conducting interviews, coding responses, overhead, support staff, travel for meetings, costs for data processing, performing software tests, data analysis, and preparing reports. In addition, an estimated cost of \$40,000 a year is required for Federal salaries and related expenses, making the total annualized project cost \$1.46 million.

The estimated cost to the Public is \$112,500.

(a) Customer Service Survey: This figure is calculated by multiplying the number of respondents 15,000 x the number of responses (1) x 30 minutes to complete (.50) x \$10

an hour, for a total of \$75,000.

(b)) E-Verify Customer Service Surveys (nonusers):

On average, respondents will need approximately 0.33 hours (20 minutes) to respond to the web survey of nonusers. Thus, assuming a response rate of 70 percent, the overall burden for the survey is computed to be:

2,500 respondents @ 20 minutes/respondent = 833 hours

Assuming an average salary rate of \$23.00 per hour, the cost to respondents for the overall burden would be:

833 hours @ \$23.00/hour = \$19,167

The incentive of \$40 per respondent (\$100,000 for 2,500 respondents) will cover this cost, so there will be no net cost to the respondents. There are no other costs to respondents.

(c) E-Verify Customer Service Surveys Employers using E-Verify in Arizona

The employer site visits include an interview with employers and a review of about 20 employee records for each employer. On average, employers will need approximately 2 hours (120 minutes) to respond to the Computer-Assisted Personal Interview (CAPI). Thus, assuming approximately 100 completed employer interviews, the overall burden for the survey is computed to be:

100 respondents @ 120 minutes/respondent = 200 hours

Assuming an average salary rate of \$23.00 per hour, the cost to respondents for the interview burden would be: 200 hours @ \$23.00/hour = \$4,600

There will be additional costs for employers to pull up to 20 employee files, which will be reviewed by the research team. We estimate it will cost each employer, on average, approximately 1 hour to pull employee files. This additional hour is computed to be:

2,000 records @ 60 minutes/20 records = 100 hours

Assuming an average salary rate of \$23.00 per hour, the cost to employers for the record review burden would be: 100 hours @ \$23.00/hour = \$2,300

Total overall burden to employers is: \$4,700 + \$2,300 = \$7,000. The incentive of \$100 per employer/respondent (\$10,000 for 100 employers) will cover this cost, so there will be no net cost to the employers.

(d) E-Verify Customer Service Surveys of Employees of Employers using E-Verify in Arizona

On average, employee/respondents will need approximately 1 hour (60 minutes) to respond to the CAPI interview. Thus, assuming approximately 450 completed employer interviews, the overall burden for the survey is computed to be:

450 respondents @ 60 minutes/respondent = 450 hours x \$10 = \$4,500

However, the incentive of \$25 per respondent (\$11,250 per employee/respondent) will cover this cost, so there will be no net cost to respondents. There are no other costs to employee/respondents.

(e) Survey of Recently Naturalized Citizens: This figure was derived by multiplying the number of respondents (7,500) x number of response 1 x 30 minutes (.5) per response x \$10 an hour for a total of a \$37,500.

15. There has been an increase of 9,583 hours in the estimated burden hours previously reported for this information collection. This can be attributed to the collection of

information the addition of four surveys. The three new surveys have increased the number of respondents to 25, 550.

16. The USCIS expects to publish the results of any new survey findings insofar as this data will be used in the conduct of the agency's Strategic Planning exercises or provide input for larger program improvements. Contractor support will be employed to collect and tabulate the results of surveys conducted. The USCIS does not release raw data but does release consolidated tabulations of statistical data showing survey results and further uses this aggregated information in the formulation of recommendations for planning and program improvement purposes. As new surveys are developed which will use statistical methods, responses to questions 1 through 5 of this section will be provided, along with specific information for that particular activity, including survey instruments. Upon completion of the analysis of data, results of the survey activities will be provided.
17. All surveys conducted under this generic clearance will display the OMB Clearance Number. Those surveys conducted telephonically will include a reference to OMB approval of the survey.
18. The USCIS does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

The USCIS or its designated contractor(s), may employ statistical methods with this Generic Clearance. As new surveys are developed which will use statistical methods, responses to questions 1 through 5 of this section will be provided, along with specific information for that particular activity, including survey instruments. Upon

completion of the analysis of data, results of the survey activities will be provided.

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.

Sunday Aigbe
Chief,
Regulatory Management Division,
U.S. Citizenship and Immigration Services.

Date