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## 1248 - QUESTION 1

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Also, can you please explain to me how the estimates of 200 annual responses and 30 minutes per response were derived? I see that DOS identifies having 50 Department of State contractors, grantees and cooperative agreement partners. Since the new statute requires reporting of "information that can be used to verify the employment of Iraqi citizens and nationals by such contractor, grantee or cooperative agreement partner" since March 20, 2003, it seems there would be many more than 200 Iraqi employees on whom this information must be submitted to DOS. I would, therefore, either expect: (1) many more than 200 responses or (2) if each respondent is submitting information on all its Iraqi employees, a greater time burden than 30 minutes in order to submit separate forms for each of its prior Iraqi employees.

Thanks for your help. Please let me know if you have any questions.

-Alex

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## RESPONSE

### 1. Estimated Number of Responses

The approximate number of responses for this collection is based on 2008 -2009 historical data derived from the Department of Defense's Synchronized Predeployment and Operational Tracker (SPOT) system. SPOT was queried for:

"TOTAL NUMBER OF IRAQI CITIZENS" in SPOT that work under DOS contracts OVER \$25,000 only as far back as the system will go.

If the \$25K only cannot be done, then just "TOTAL NUMBER OF IRAQI CITIZENS" as far back as the system will go.

The SPOT number was 187 which was rounded to 200. SPOT was initiated in 2007 becoming fully operational in 2008. Therefore, any pre-2008 numbers are considered unreliable. As stated in the Supporting Statement, the number of responses is an **estimate** of annual number of responses. There is no reliable historical accounting of the actual number of Iraqis employed under Federal contract, grant or cooperative agreement. The accuracy of the number of Iraqis, currently or formerly employed under a Department of State contract, grant or cooperative agreement, is uncertain due the security issues associated with collecting the personal information of Iraqi's supporting the Department of State's efforts in Iraq. In general, contractors, grantees and cooperative agreement partners are and have been very hesitant to provide personal

information regarding their respective Iraqi employees. It is, however, possible there will be more than 200 responses, or less.

## **2. Estimated Time Burden per Response**

The estimated time burden in this scenario is “per Response” and not per respondent.

The estimated time burden to complete the response is based on the burden estimate for the Bureau for Population, Refugees and Migration’s Special Immigrant Visa Biodata Form (DS-0234 / OMB Approval No. 1405-0015) which has an estimated burden of 20 minutes. The estimated burden for the DS-7655, the form for this collection, is 30 minutes to allow for additional research time for the respondent.