

**Supporting Statement
Survey of Recently Naturalized Citizens
(File No. OMB-52)
OMB No. 16515-NEW**

A. Justification:

- 1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirements that necessitate the collection.**

The decision to naturalize has important implications for workload at USCIS offices. For each applicant, USCIS must process, interview, administer civics and language tests, and run a security check. USCIS needs to know more about the characteristics of newly naturalized citizens, changes since they first immigrated, and their motivations for naturalizing. If the agency is able to better predict demand for naturalization it will assist in planning for future workflow for both naturalization and immigration petitions of family members outside the United States. Ultimately, better workflow planning can help prepare for future application surges and prevent front logs and backlogs, improving the agency's customer service.

Accordingly, USCIS designed a survey to inform the government on characteristics of recently naturalized citizens, their timing and motivation for naturalizing. This study will provide the type of information about naturalized citizens requested by Congress during hearings in 2008. For example, Congress wanted to know the average number of years that applicants wait before they apply for citizenship. While some basic information on naturalization is available, little is empirically known about naturalization timing and any policy or operational changes that could be made to encourage immigrants to naturalize. The information provided by this survey would answer these Congressional questions and could also be used by the USCIS Chief Financial Officer to determine future application fees during the next biannual review of the agency fee structure.

Authority: Section 103(a) of the Immigration and Nationality Act.

- 2. Explain how, by whom, and for what purpose the information is to be used. For revised or extended collections, explain how the DHS has used the information on the current collection.**

The purpose and use of this information is to inform the government on characteristics of naturalized immigrants and improve projections of when immigrants can be expected to naturalize and the motivations behind that timing. This study will provide the type of information about naturalized citizens requested of the USCIS Director in Congressional hearings on January 2008 when he was asked for information on the average number of years that applicants wait before they apply for citizenship. The information provided by this survey would answer these Congressional questions and could also be used by the

USCIS Chief Financial Officer to determine future application fees during the next biannual review of the agency fee structure.

While very basic information is available, little is empirically known about why immigrants naturalize when they do and whether there are policy or operational changes that might be made that would encourage immigrants to naturalize more quickly. This study should provide the answer to these and many other policy questions with greater precision, including:

- Why do permanent residents naturalize?
- What factors affect the timing of naturalization, and which are most important in making the decision to naturalize?
- What are the perceived impediments to naturalization and how do they vary by such factors as age, nationality, and years in the United States?
- How have new citizens' lives changed since their admission as permanent residents? Since they naturalized?
- What is the educational attainment of naturalized citizens and where did they obtain their education?
- To what extent are new citizens engaged in their communities? ... in their sending countries?
- How do new citizens rate their ability to read, write, and understand English?
- To what extent do new citizens plan on bringing their immediate relatives to the United States?
- To what extent have and do new citizens support relatives in their sending countries?

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, eg. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce the burden on the public.

In order to increase efficiency and consequently decrease respondent burden, survey participants will be interviewed using Computer Assisted Telephone Interview (CATI) technology. The telephone survey will be administered by a contractor. Only those items which are essential in determining motivations to naturalize of the interviewee or to validate the responses are included.

If all phone attempts have failed, but the contractor has verified addresses, the contractor will mail an abridged questionnaire to the respondent. This often lends authenticity to a project and demonstrates the type of professional data collection being conducted. The

goal of this mail effort is to increase the response rate and to encourage participation in the survey via CATI to decrease burden. On the last page of the short mail questionnaire the respondent is asked to consider conducting the telephone survey and they are provided with a toll-free number to call to complete the survey. They are also asked to include their phone number. The contractor will call those who provide their phone number and attempt to complete the telephone interview. For those who do not wish to conduct the interview by phone we will use their information for non-response bias analysis.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in question 2 above.

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. If the information collection impacts small businesses or other small entities, describe any methods used to minimize the burden.

This collection of information does not have an impact on small businesses or other small entities.

6. Describe the consequences to the Federal program or policy activities if the collection of information is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden to the public.

This study is essential to the improvement of USCIS programs and services. If this study is not conducted, knowledge regarding naturalization motivations and immigration petitions will be limited and USCIS will not be able to implement policy or operational changes that would encourage more immigrants to naturalize more quickly. If this information is not collected, it will hinder USCIS's ability to predict future demand for naturalization and to plan for future workflow for both naturalization and the resulting immigration petitions filed for the future immigration of family members outside the United States. This survey is a one-time data collection event. There are no legal obstacles to reducing the burden to the public.

7. Explain any of the 7 special circumstances that would cause an information collection to be conducted in a manner that requires more than one submission:

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to the notice and describe actions taken by the agency in response to these comments.**

Also, describe any efforts to consult with persons outside the agency to obtain their views.

On April 8, 2009, USCIS published a 60-day notice in the Federal Register at 74 FR 15999. USCIS did not receive any comments for this information collection.

Consultants with various areas of expertise have been used to refine the survey questionnaire. The consultants include distinguished academic scholars in the fields of political science, survey (including sampling) methodology, sociology and public policy. These consultants have provided scientific review of the study methods and survey instruments. A list of the consultants who have provided assistance regarding this study is provided in Appendix A of the supplemental statement.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

The contractor will offer \$15 to respondents whose only telephone is a cell phone to compensate respondents for minutes used while participating in the survey. This type of compensation has become increasingly necessary as more households move to a cell phone as the only telephone connection. The contractor will also offer a **\$20 incentive** payment for hard-to-reach respondents whose participation in the survey comes about through the face-to-face contact with a field interviewer who lends the respondent a cell phone to use to complete the survey.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The respondent is informed that the response is voluntary, that their names will never be associated with the data collected and they can end the survey at any time. The contractor has a Federal-Wide Assurance and complies with all Internal Review Board protocols for privacy and the ethical treatment of human subjects in research.

Respondents are assigned a unique identification number that is associated with survey data, rather than using names, addresses, or telephone numbers. The information will be used for this purpose only and will be deleted upon completion of the interview. Neither the names nor any other information by which respondents could be individually identified will be recorded with survey answers. Therefore, answers cannot be linked to individual respondents.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The survey questionnaire contains no questions of a sensitive nature

- 12. Provide estimates of the hour burden of collection of information.**

Form Name	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Introductory Call/Screening	7,150	1	2 minutes (.033)	236
Questionnaire	5,000	1	25 minutes (.416)	2,080

Total annual reporting burden is 2,316 hours. This figure was derived by multiplying number of respondents to the introductory screening (7,150) by the length of the introductory section of the survey (2 minutes); and by multiplying the number of total number of completed survey cases (5,000) by the length of the questionnaire, which has been tested to time at 25 minutes.

- 13. This question involves the requirement of a respondent to expend monies for a capitalized item to support recordkeeping requirements necessitated by the collection of information.**

There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this collection are identified in question 14.

- 14. Provide estimates of annualized cost to the Federal government and to the public.**

Printing Cost	\$	0
Contract Cost	\$	1,420,000
Collecting and Processing	\$	3,200
Total Cost to Program	\$	1,423,200
Fee Charge	\$	0
Total Annual Cost to Government	\$	1,423,200

Cost to the Government is \$1,423,200.

The contracting cost to conduct the survey is \$1.42 million. 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, it will take USCIS 80 hours to process the results (80 hrs multiplied by \$40 average hourly rate) equaling an estimated cost of \$3,200 a year is required for Federal salaries and related expenses, making the total annualized project cost \$1.42 million.

Cost to the public is \$23,160. This figure was derived by multiplying the number of (5,000) x number of responses 1 x 25 minutes (.416) per response x \$10 an hour for a total of \$ 20,800; and by multiplying the number of respondents 7,150 x number of responses 1 x 2 minutes (.033) per response x \$10 and hour for a total of \$2,360.

15. Provide the reasons for any changes in the burden hours (increase or decrease) and whether it is a result of an (adjustment or program change).

Since this is a new information collection, there is an increase of 2,316 annual burden hours previously reported on the OMB inventory.

16. For collections of information whose results will be published, outline plans for tabulation, and publication.

The Analysis plan includes analysis tables of the independent variables and outcome variables outlined below. We will also use multivariate analysis (linear regression) of the independent variables impact on outcome variables controlling for demographic characteristics.

Classes of Variables

1. *Dependent variables or outcomes to be explained:*

- Number of applications (Question (Q)4)
- Main motivation for applying for citizenship (Q28 A-J)
- Timing of citizenship application (Q 29, Q30)
- Future petitions for relatives to come to the US (Q36)
- Political and civic engagement (Q40-Q43)
- Experience of discrimination (Q44-45) (will also be an independent variable)
- Impact of naturalization (Q47)
- American Identity (Q48-51)

2. *Classifying variables:*

- National origin (Q1a)
- Race/Ethnicity (Q59-60)

- Income (Q61)
- Sex (From sample file)
- Age (From sample file)
- Education (Q55)
- Time in the US (Q18)
- Length of LPR status (Q29)
- Family form and sequencing of arrival, LPR (Q21a)
- Religion (Q80-82)

3. *Mediating variables:*

- English abilities (Q14-Q16)
- Help with application (Q5)
- Classes to learn/improve English (Q19 A,B)
- Help with exam (Q8)
- Prep time for exam (Q8)
- Ties to home country (Q24-Q28)
- Factors influencing citizenship application (Q28 – could also be outcomes)
- Factors influencing timing of application (Q30)
- Work Status (Q31)

A.16 - 1 Project Time Schedule	
Activity	Time Schedule
Letters sent to respondents	1-2 weeks after OMB approval
Field telephone questionnaire	3-4 weeks after OMB approval
Complete field work	3 months after OMB approval
Analyses	4 months after OMB approval
Presentation	5 months after OMB approval

17. If seeking to not display the expiration date for OMB approval of the information collection, explain the reasons that the display would be inappropriate.

USCIS will display the OMB expiration date for this information collection.

18. Explain each exception to the certification statement identified in item 19.

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

B. Collection of Information Employing Statistical Methods.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results.

See separate Supporting Statement B for description of statistical methods to be used.

C. Certification and Signatures

PAPERWORK CERTIFICATIONS

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 Products Division,
U.S. Citizenship and Immigration Services.

Date

Appendix A

Outside Scholars Consulted on Survey Questionnaire Design and Content

Professor Michael Jones Correa
Government Department
Cornell University

Professor Jane Junn
Political Science Department
Rutgers University

Professor Louis DeSipio
Department of Political Science
University of California, Irvine

Professor Irene Bloemraad
Department of Sociology
University of California, Berkeley

Professor Jennifer Hochschild
Department of Government
Harvard University

Professor John Mollenkopf
Center for Urban Research
CUNY Graduate Center

Professor Taeku Lee
Department of Political Science
University of California, Berkeley

Beverly Weidmer
Survey Director
RAND Corporation

Mike Battaglia
Sampling Statistician
Abt Associates

Allison Ackerman
Survey Methodologist
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