

## **SUPPORTING STATEMENT**

### **Freedom of Information/Privacy Act Request**

**(Form G-639)**

**OMB No. 1615-0102**

#### **A. JUSTIFICATION:**

1. Title 5 U.S.C. 552 allows requestors to have access to U.S. Citizenship and Immigration Service (USCIS) records under the Freedom of Information Act, except those that have been exempted by the Act. Title 5 U.S.C. 552a, with certain exceptions allows individuals to gain access to information pertaining to themselves in USCIS records. 8 CFR 103.10 provides procedures for accessing USCIS records.
2. Form G-639 is provided as a convenient means for persons to provide data necessary for identification of a particular record desired under the Freedom of Information/Privacy Act (FOIA/PA). However, requests may be submitted in any written form. Form G-639 provides rapid identification of such requests and ensures expeditious handling.
3. The use of this form 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. 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 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 form was created to facilitate an accurate and timely response to an information request. If the information is not collected, a response to an information request may be unduly delayed.
7. There are no special circumstances applicable to this information collection.
8. On March 23, 2009, USCIS published a 60-day notice in the Federal Register at 74 FR 12145. 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:

a.	Number of Respondents	100,000
b.	Number of Responses per Respondent	1
c.	Total Annual Responses	100,000
d.	Hours per Response	.25
e.	Total Annual Reporting Burden	25,000

**Annual Reporting Burden**

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

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

14. **Annualized Federal Cost Analysis:**

a.	Printing Cost	\$	18,000
b.	Collection and Processing Cost		4,000,000
c.	Total Cost to Program		4,018,000
d.	Fee Charge		0
e.	Total Cost to Government	\$	4,018,000

**Government Cost**

The estimated cost to the Government is **\$4,018,000**. This figure is calculated by multiplying the estimated number of respondents 100,000 x 1 hour (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 \$18,000.

**Public Cost**

The estimated annual public cost is **\$250,000**. This is based on the number of respondents 100,000 x 15 minutes (.25) per response x \$10 (Average hourly rate).

- 15. There has been no increase or decrease in the number of burden hours previously reported for this information collection.
- 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 of OMB approval of 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.

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**Stephen Tarragon,**  
Deputy Chief,  
Regulatory Products Division  
U.S. Citizenship and Immigration Services.

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**Date**