

SUPPORTING STATEMENT

Notice of Naturalization Oath Ceremony

Form N-445

(OMB No. 1615-0054)

A. JUSTIFICATION.

1. U.S. Citizenship and Immigration Services (USCIS) requires that immediately prior to commencement of an oath ceremony, each applicant for naturalization complete the questionnaire on Form N-445 (8CFR 337.2(c)).
2. The information furnished on Form N-445 refers to events that may have occurred since the applicant's initial interview and prior to the administration of the oath of allegiance. Several months may elapse between these dates and the information that is provided assists the officer in rendering an appropriate decision on the application.
3. The use of Form N-445 provides the most efficient means for collecting and processing the required data. In this case, U.S. Citizenship and Immigration Services (USCIS) does not employ the use of information technology in collecting and processing information. This form is provided to USCIS by the applicant in person at the location when the oath ceremony is conducted, therefore it is not necessary to have e-filing capability on this form.
4. A search of USCIS automated forms tracking system was accomplished and revealed no duplication. There is no similar data collected.
5. This collection of information does not have an impact on small businesses or other small entities.

6. If this information is not collected and presented to the USCIS officer at the time of the ceremony, there is no mechanism for USCIS to retrieve this information and allow for an appropriate decision to be made on the applicant for administration of the oath of allegiance.
7. There are no special circumstances applicable to this information collection.
8. On October 22, 2009, USCIS published a 60-day notice in the Federal Register at 74 FR 54591. USCIS did not receive any comments. On December 29, 2009, USCIS published a 30-day notice in the Federal Register at 74 FR 68854.
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	650,000
b.	Number of Responses per each Respondent	1
c.	Total Annual Responses	650,000
d.	Hours per Response	.166
e.	Total Annual Reporting Burden	107,900

Annual Burden Hours

Total annual reporting burden hours is **107,900**. This number is calculated by multiplying the number of respondents (650,000) x frequency of response (1) x .166 hours (10 minutes) per response.

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 this information collection.

14. **Annualized Cost Analysis:**

a.	Printing Cost	\$	117,000
b.	Collection and Processing Cost	\$	2,158,000
c.	Total Cost to Program	\$	2,275,000
d.	Fee Charge	\$	0
e.	Total Cost to Government	\$	2,275,000

Government Cost

The estimated cost of the program to the Government is \$2,275,000. This figure is calculated by using the estimated number of respondents (650,000) multiplied (x) by .083 (5 minutes) (time required to collect and process information) x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). In addition, it is estimated that overhead cost for printing, stocking, distributing, and processing of this form will be \$117,000.

Public Cost

The estimated annual public cost is \$ 1,079,000. This is based on the number of respondents 650,000 x number of responses (1) x .166 (5 minutes) per response x \$10 (average hourly rate).

15. There has been an increase of 53,950 in the estimated annual burden hours for this information collection . USCIS indicated in the last supporting statement that the estimated time per response is 5 minutes. However, it should have been reported as 10 minutes.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. USCIS will not display the expiration date for this information collection on the form.

- a. Displaying the expiration date serves no useful purpose for USCIS information collections, confuses the public, and requires USCIS to expend scarce fee revenue to re-program automated systems in order to change the expiration date.
- b. At any given time there are numerous forms on the USCIS Web site that have dates on them that indicate that the form has “expired.”
- c. The public, which is mostly unfamiliar with the Paperwork Reduction Act, does not know what that date means. Our experience indicates that much of the public interprets that date as meaning that the form has actually expired and thus there must be a current version available elsewhere.
- d. USCIS call centers receive numerous unnecessary inquiries about the “new” form when the version on the Web site has “expired” while USCIS awaits OMB approval of a revision or extension of the currently approved information collection.
- e. USCIS has recently posted a notice on its Web site informing the public that a form on that site that indicates that it has expired is still valid and accepted, which renders the expiration date meaningless.
- f. In the case of a request for an extension of an approved information collection, many of which USCIS must provide annually, the only change on the form may be the expiration date. In that case, the USCIS centralized Lockbox intake facility still must re-program its software to update it for the current version of the form at a cost of \$1,000. More extensive changes are more costly.
- g. Not displaying the expiration date on the form would allow USCIS to forego reprogramming costs in the case of a simple extension.

Accordingly, USCIS requests permission to not display the expiration date of this information collection because displaying the expiration date confuses the public, serves no purpose, and may require inefficient expenditure of fee revenue collected from those who have requested immigration benefits.

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.

Sunday Aigbe
Chief,
Regulatory Products Division,
U.S. Citizenship and Immigration Services,
Department of Homeland Security.

Date