

## SUPPORTING STATEMENT

### Sworn Statement of Refugee Applying for Admission into the United States

Form G-646

OMB No. 1615-0097

#### A. Justification.

1. Section 207 of the Immigration and Nationality Act (INA) authorizes the Secretary, Department of Homeland Security (DHS) to admit refugees that are admissible. The information collection required on Form G-646, Sworn Statement of Refugee Applying for Admission into the United States, is necessary in order for U.S. Citizenship and Immigration Services (USCIS) to make a determination that the admissibility grounds and conditions are met by the applicant. Upon approval of the application for refugee status the applicant is eligible for admission to the United States as a refugee.

**Authority:** Section 207 of the INA.

2. The data collected on this form is used by the USCIS to determine eligibility for the admission of applicants to the United States as refugees. The form serves the purpose of ensuring that basic information required to assess eligibility is provided to petitioners, and standardizing requests for the benefit.
3. The use of this form provides the most efficient means for collecting and processing the required data. In this case the DHS does not employ the use of information technology in collecting and processing information. The DHS does not have the automated capability in

place to accept the electronic submission of applications. In addition, most refugee processing occurs in remote areas without access to such information technology.

4. A review of the USCIS Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available, which can be used for this purpose.
5. This collection of information does not have an impact on small business or other small entities.
6. Without this information collection, USCIS will not be able to determine the admissibility of refugees.
7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.
8. On November 10, 2009, USCIS published a 60-day notice in the Federal Register at 74 FR 58037. On February 1, 2010, USCIS published a 30-day notice in the Federal Register at 75 FR 5097. 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. The questions of a sensitive nature regarding particular behavior, health conditions and particular beliefs are required to determine admissibility to the United States. This information is used to determine the applicant's admissibility.

12. **Annual Reporting Burden:**

- |  |        |
|--|--------|
| a. Number of Respondents                   | 75,000 |
| b. Number of responses per each Respondent | 1      |

|                                  |        |
|----------------------------------|--------|
| c. Total Annual Responses        | 75,000 |
| d. Hours per Response            | .333   |
| e. Total Annual Reporting Burden | 24,975 |

**Annual Reporting Burden**

**The total annual reporting burden hours is 24,975.** This figure was derived by multiplying the number of respondents (75,000) x frequency of response (1) x .333 hours (20 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 collection are identified in item 14. Additionally, there is no fee charge for this information collection.

14. **Annualized Cost Analysis:**

|                                   |              |
|-----------------------------------|--------------|
| a. Printing Cost                  | \$ 13,500    |
| b. Collection and Processing Cost | \$ 1,500,000 |
| c. Total Cost to Program          | \$ 1,513,500 |
| d. Fee Charge                     | \$ 0         |
| e. Total Cost to Government       | \$ 1,513,500 |

**Government Cost**

**The estimated cost to the Government is \$1,513,500.** This figure is calculated by using the estimated number of respondents 75,000 x .50 (30 minutes) (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 that is \$13,500.

### **Public Cost**

**The estimated annual public cost is \$ 249,750.** This estimate is based on the number of respondents 75,000 x number of response (1) x .333 (20 minutes) per response x \$10 (average hourly rate).

15. There is no increase or decrease in the 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 collection of information.
17. DHS 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 inquires 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.

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**Sunday Aigbe,**

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**Dated:**

Chief,

Regulatory Products Division,

U.S. Citizenship and Immigration Services.