

SUPPORTING STATEMENT

Application for Replacement Naturalization/Citizenship Document

(Form N-565)

OMB No. 1615-0091

A. Justification.

1. Section 343(a) of the Immigration and Nationality Act (Act) provides that if any certificate of naturalization or citizenship issued to any citizen or any declaration of intention furnished to any declarant is lost, mutilated, or destroyed, the citizen or declarant may make application to the Secretary of Homeland Security for a new certificate or declaration. The Form N-565 is used to apply for a replacement of a Declaration of Intention, Naturalization Certificate, Certificate of Citizenship or Repatriation Certificate, or to apply for a special certificate of naturalization as a United States citizen to be recognized by a foreign country.
2. The form is provided by U.S. Citizenship and Immigration Services (USCIS) to determine the applicant's eligibility for a replacement document. An applicant may file for a replacement if he or she was issued one of the documents described above that was lost, mutilated or destroyed, or if the applicant's name was changed by a marriage or by court order after the document was issued and now seeks a document in the new name. If the applicant is a naturalized citizen who desires to obtain recognition as a citizen of the United States by a foreign country, he or she may apply for a special certificate for

that purpose. There are some minor edits to the form and instructions (see table of changes).

3. The use of this form currently provides the most efficient means for collecting and processing the required data. This form can be completed electronically but cannot be e-filed. This form has been designated for e-filing as part of the Business Transformation Project.
4. A review of USCIS's Forms Inventory Report revealed no duplication of efforts. There is no other 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. Without the Form N-565, USCIS could not provide applicants with a replacement of a Declaration of Intention, Naturalization Certificate, Certificate of Citizenship or Repatriation Certificate, or provide a special certificate of naturalization as a U.S. citizen to be recognized by a foreign country. If an applicant cannot show he or she is a U.S. citizen, they could be denied employment, the ability to petition for other relatives to immigrate to the U.S., and could be denied benefits under Welfare Reform due to their inability to provide evidence of their citizenship. Additionally, a citizen would be denied a U.S. passport for lack of a certificate of citizenship or naturalization.
7. There are no special circumstances 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 5098.

USCIS did not receive any comments.

- 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	22,567
b.	Number of Responses per each request	1
c.	Total Annual Responses	22,567
d.	Hours per Response	.916
e.	Total Annual Reporting Burden	20,671

Annual Reporting Burden

Total annual reporting burden is 20,671. This figure was derived by multiplying the number of respondents (22,567) x frequency of response (1) x .916 hours (55 minutes) per response. The estimate is based on prior USCIS experience with the program.

- 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. There is a fee charge of \$380 associated with the filing of this information collection.

14. **Annualized Cost Analysis:**

Printing Cost	\$	8,124
Collecting and Processing	\$	8,567,336

Total Cost to Program	\$ 8,575,460
Fee Charge	\$ 8,575,460
Total Annual Cost to Government	\$ 0

Government Cost

The estimated cost of the program to the Government is calculated by using the estimated number of respondents (22,567) multiplied by the suggested \$380 fee charge (which includes the suggested average hourly rate for clerical, officer, and managerial time with benefits). In addition, this figure includes the estimated overhead cost for printing, stocking, distributing and processing of this form).

Annual Public Cost

The estimated annual public cost is \$ 8,782,173. This estimate is based on the number of respondents (22,567) x number of responses (1) x .916 hours (55 minutes) per response x \$10 (average hourly rate), plus the number of respondents (22,567) x fee charge of \$380.

15. There has been no increase in the estimated burden hours reported for this collection of information.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this information collection.
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 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

Date

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

