

SUPPORTING STATEMENT

Registration for Classification as Refugee

(Form I-590)

OMB No. 1615-0068

A. JUSTIFICATION:

1. Section 207 of the Immigration and Nationality Act (Act) provides for the admission of refugees into the United States. Procedures for admission of refugees into the United States are contained in 8 CFR 207.2(a). The annual refugee admission ceiling is set by the President in consultation with Congress. A refugee is defined in section 101(a)(42) of the Act.
2. Form I-590 provides a uniform method for applicants to apply for refugee status and contains the information necessary to adjudicate such applications. Without the use of this form, processing of refugees would be delayed and could result in non-compliance with the Act.
3. The use of this form 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 has been scheduled for e-filing as part of the Business Transformation Project.
4. A review of 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. Section 101(a)(42) of the Act defines a refugee as a person having a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. Form I-590 provides the information necessary to determine

an applicant's claim as a refugee. If the collection of information is not conducted, USCIS could not identify those refugees eligible for admission to the U.S. pursuant to section 207 of the Act. Furthermore, it could result in non-compliance with the Act.

7. There are no special circumstances applicable to this information collection.
8. On October 16, 2009, USCIS published a 60-day notice in the Federal Register at 74 FR 53285. On February 1, 2010, USCIS published a 30-day notice in the Federal Register at 75 FR 5101. 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	140,000
b.	Number of Responses per Respondent	1
c.	Total Annual Responses	140,000
d.	Hours per Response	.583
e.	Total Annual Reporting Burden	81,620

Annual Reporting

The total annual reporting burden hours are **81,620**. This figure was derived by multiplying the number of respondents (140,000) x frequency of response (1) x .583 (35 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. Additionally, there are no fee charges associated with the collection of this information.

14. **Annualized Cost Analysis:**

a.	Printing Cost	\$	25,200
b.	Collection and Processing Cost	\$	4,200,000
c.	Total Cost to Program	\$	4,225,200
d.	Fee Charge		0
e.	Total Cost to Government	\$	4,225,200

Government Cost

The estimated cost to the Government is \$4,225,200. This figure is calculated by multiplying the estimated number of respondents 140,000 x .75 (45 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, which is \$25,200.

Public Cost

The estimated annual public cost is \$816,200. This is based on the number of respondents 140,000 x .583 (35) minutes 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. 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,
Chief,
Regulatory Products Division,
U.S. Citizenship and Immigration Services,
Department of Homeland Security.

Date