

SUPPORTING STATEMENT

Sponsor's Notice of Change of Address, Form I-865

OMB No. 1615-0076

A. JUSTIFICATION:

1. The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 created section 213A of the Immigration and Nationality Act (Act). Section 213A(d)(1) of the Act requires every sponsor to notify the U.S. Citizenship and Immigration Services (USCIS) of his or her new address within 30 days of any change of address. The sponsor will meet this obligation by filing this form with the USCIS.
2. The data collected on Form I-865 will be used by an entity that has provided any means-tested public benefit to a sponsored alien to locate and require reimbursement from the sponsor for an amount equal to the unreimbursed costs of the provided benefits.
3. The use of Form I-865 provides the most efficient means for collecting and processing the required data. This form can be completed electronically on the USCIS Web site but cannot be e-filed. 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 effort, and there is no other similar information currently available which can be used for this specific purpose.
5. This collection of information does not have an impact on small businesses or other small entities.
6. If the information is not collected, providers would not have information on sponsors of aliens that may receive means-tested public benefits, and it may prove difficult to pursue the reimbursement of unreimbursed costs from sponsors.

7. There are no special circumstances associated with this information collection.
8. On June 9, 2010, USCIS published a 60-day notice in the Federal Register at 75 FR 32801. On August 26, 2010, USCIS published a 30-day notice in the Federal register at 75 FR 52541. USCIS did not receive any comments.
9. The 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:**

No. of respondents	100,000
No. of responses per respondent	1
Total Annual Responses	100,000
Hours per response	.25
Total Annual Reporting Burden	25,000

Annual Reporting

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

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

14. **Annualized Cost Analysis:**

Printing Cost	\$ 18,000
Collecting and Processing	\$ 1,000,000
Total Cost to Program	\$ 1,018,000
Fee Charge	0
Total Annual Cost to Government	\$ 1,018,000

Government Cost

The estimated cost to the Government for the information collection is \$1,018,000. This figure is calculated by multiplying the estimated number of respondents (100,000) x (1) number of responses x (.25) (15 minutes) government response time x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). This figure also includes the estimated overhead cost for printing, stocking, and distributing the forms which is \$18,000.

Public Cost

The estimated annual public cost of this information collection is \$747,250. This figure is based on the number of respondents (100,000) x (1) frequency of response x (.25) (15 minutes) per response) x \$29.89 (average hourly rate).

15. There has been no increase or decrease in the reporting burden hours for this collection of information.
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 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.

Date