

## **Supporting Statement**

### **Application for Citizenship and Issuance of Certificate under Section 322**

**(Form N-600K)**

**OMB No. 1615-0087**

#### **A. Justification:**

1. The U.S. Citizenship and Immigration Services (USCIS) requires the information collected on the Form N-600K, Application for Citizenship and Issuance of Certificate Under Section 322, in order to make a determination whether the applicant has met the citizenship eligibility requirements under section 322 of the Immigration Nationality Act (Act). Upon approval of the application, the child is declared to be a citizen of the United States and is issued a certificate of citizenship by USCIS.
2. The data collected on this form is used by USCIS to determine eligibility for the requested immigration benefit of citizenship. The form serves the purpose of standardizing requests for the benefit, and will ensure that the basic information required to assess eligibility is provided by the applicants.
3. The use of this form currently provides the most efficient means for collecting and processing the required data. To enhance customer service, this form currently resides on USCIS.gov Web site and is fillable and savable to a local

- desktop. This form has been designated for e-filing under the business transformation initiative.
4. A review of 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 businesses or other small entities.
  6. Section 322 of the Act provides for the issuance of a Certificate of Citizenship to minor adopted or biological children who regularly reside outside the United States and whose United States citizen parent(s) wish to have them acquire United States citizenship. The Form N-600K is used to demonstrate that the child meets certain eligibility conditions while under the age of 18 years. Since Form N-600K provides an organized framework for establishing the authenticity of such eligibility, it is essential for providing prompt, consistent and correct processing of such applications for citizenship. If the information is not collected, the applicant cannot show that he or she has met all of the eligibility requirements for acquisition of citizenship and receipt of a certificate of citizenship.
  7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

8. By notice in the Federal Register on June 29, 2011, at 76 FR 38197, USCIS notified the public that it was revising this information collection. The notice allowed for a 60-day public comment period on the proposed revisions, and USCIS received one comment. USCIS appreciates the comment, however, the comment dealt with changes that were proposed, and USCIS is postponing the planned revisions until the end of 2012. USCIS requests to extend the current information collection without revision at this time. USCIS will consider and address the public comment and any additional comments that are received when it issues the revised form.

For reasons described above, USCIS published a 30-day notice in the Federal Register on September 19, 2011, at 76 FR 58029 extending the current information collection without revision, and USCIS has not received any comments on the extension to date.

9. USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.
10. There is no assurance of confidentiality. The system of record notice associated with this information collection is DHS/USCIS-005 Inter-Country Adoptions which was published in the Federal Register on June 5, 2007, at 72 FR 31086. The privacy impact assessment associated with this information collection is the

U.S. Citizenship and Immigration Services Secure Information Management Service (SIMS) Pilot with Inter-Country Adoptions.

11. There are no questions of a sensitive nature.

12. Annual Reporting Burden:

a.	Number of Respondents	2,950
b.	Number of Responses per each Respondent	1
c.	Total Annual Responses	2,950
d.	Hours per Response	1.583
e.	Total Annual Reporting Burden	4,670

**Annual Reporting Burden**

**Total annual reporting burden hours is 4,670.** This figure was derived by multiplying the number of annual respondents (2,950) x (1) frequency of response x (1.583) (1 hour and 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 collection are identified in question 14. There is a \$600 fee for a biological child (or a \$550 fee for an adopted child) associated with this information collection.

14. Annualized Cost Analysis:

a.	Printing Cost	\$ 2,755
b.	Collecting and Processing	\$ 1,767,245
c.	Total Cost to Program	\$ 1,770,000
d.	Fee Charge	\$ 1,770,000
e.	Total Annual (Net) Cost to Government	\$ 0

**Government Cost**

The estimated cost of the program to the Government is calculated by using the estimated number of respondents (2,950) x (1) frequency of response x (\$600) fee charge. The fee charges include the average hourly rate for clerical, officer, and managerial time with benefits, plus a percent for the estimated overhead cost for printing, stocking, distributing and processing of this form.

**Public Cost**

**The estimated annual public burden cost is 143,551.** This estimate is based on the number of respondents (2,950) x (1.583 hours) (1 hour 35 minutes) per response x (\$30.74) average hourly rate.

**The estimated annual fee cost is \$1,770,000.** This estimate is based on the number of respondents (2,950) x (\$600) fee charge.

15. There has been an increase of 3,237 burden hours previously reported for this information collection. This change can be attributed an increase in the number of respondents from 906 respondents to 2,950. The increase in the number of respondents is based on updated FY 2010 statistical data and the resulting adjustment in agency estimates. There is no change in the information being collection.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. USCIS will display the expiration date for OMB approval of this information collection.
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 A Aigbe**  
Chief,  
Regulatory Products Division,  
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Department of Homeland Security.

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**Date**