

SUPPORTING STATEMENT
Interagency Record of Request
A, G, or NATO Dependent Employment Authorization or
Change/Adjustment To/From A, G, or NATO Status
Form I-566
OMB Control No. 1615-0027

A. JUSTIFICATION:

1. U.S. Citizenship and Immigration Services (USCIS) requires eligible dependents of A-1, A-2, G-1, G-3, G-4 or NATO 1-7 nonimmigrants to use this form in connection with their applications for employment authorization. (Definitions and eligibility requirements may be found in 8 CFR 214.2(a), 214.2(g) and 214.2(s). Foreign government diplomats and officials and their personal employees (classified as A-1, A-2 and A-3), representatives of international organizations and their personal employees (classified as G-1 through G-5), and officials or employees of the North Atlantic Treaty Organization (NATO) and their personal employees (classified as NATO-1 through NATO-7) use this form in connection with their own or their family member's request to change to another nonimmigrant classification or to adjust their nonimmigrant status to lawful permanent resident status.
2. The data on this form is used by Department of State (DOS) to certify to USCIS eligibility of dependents of A or G principals requesting employment authorization, as well as for NATO/Headquarters, Supreme Allied Commander Transformation (NATO/HQ SACT) to certify to USCIS similar eligibility for dependents of NATO principals. DOS also uses this form to certify to USCIS

that certain A, G or NATO nonimmigrants may change their status to another nonimmigrant status. USCIS, on the other hand, uses data on this form in the adjudication of change or adjustment of status applications from aliens in A, G, or NATO classifications, and following any such adjudication informs DOS of the results by use of this form.

The information provided on this form continues to ensure effective interagency communication among the three governmental departments – the Department of Homeland Security (DHS), DOS, and the Department of Defense (DOD) – as well as with NATO/HQ SACT. These departments and organizations utilize this form to facilitate the uniform collection and review of information necessary to determine an alien’s eligibility for the requested immigration benefit. This form also ensures that the information collected is communicated among DHS, DOS, DOD, and NATO/HQ SACT regarding each other’s findings or actions.

3. The use of this form provides the most efficient means for collecting and processing the required data. In this case, USCIS does not employ the use of information technology in collecting and processing information. This form is posted on USCIS’s Web site and can be completed and saved electronically. This form has been designated for e-filing under USCIS’s business transformation initiative.
4. A search of USCIS automated forms tracking system was accomplished and revealed no duplication. There is no similar data collected.
5. This collection of information does not have an impact on small businesses or other small entities.

6. If this information is not collected, USCIS would not be able to adjudicate requests for work authorization and change/adjustment of status from dependents of A, G, or NATO principals, because receipt of this form from DOS and NATO/HQ SACT certifying eligibility in accordance with bilateral or *de facto* employment agreements to seek these benefits is required prior to USCIS adjudication. In addition, information that aliens in these classifications have adjusted their status to lawful permanent residents would not be communicated to DOS and NATO/HQ SACT, and thereby not allowing DOS and NATO/HQ SACT the required information to remove such aliens from their respective databases and take other appropriate actions.
7. There are no special circumstances applicable to this information collection
8. By notice in the Federal Register on August 18, 2011, at 76 FR 51382, USCIS notified the public that it was extending this information collection. The notice allowed for a 60-day public comment period, and USCIS did not receive any comments. USCIS published a 30-day notice in the Federal Register on November 16, 2011, at 76 FR 71056, and USCIS has not received any comments 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. Information collected from Form I-566 is not entered into an electronic system; therefore a Privacy Impact Assessment (PIA) is not required. The system of record associated with this information

collection is United States Citizenship and Immigration Services Benefits Information System (DHS/USCIS-007).

If the Form I-566 is approved, USCIS may process the Application for Employment Authorization, Form I-765. The PIA associated with Form I-765 is Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3).

11. There are no questions of a sensitive nature.

12. **Annual Reporting Burden:**

a. Number of Respondents	5,800
b. Number of Annual Responses per Respondent	1
c. Total Annual Responses	5,800
d. Hours per Response	0.25
e. Total Annual Reporting Burden	1,450

Annual Burden Hours

The total annual reporting burden hours are 1,450. This number is calculated by multiplying the number of annual respondents (5,800) x (1) frequency of annual responses x (0.25 hours) (15 minutes) per responses.

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 are identified in item

14. (There is no fee charge associated with this information collection.)

14. **Annualized Cost Analysis:**

a. Printing Cost	\$ 5,200
b. Collecting and Processing	\$ 226,800

c. Total Cost to Program	\$ 232,000
d. Fee Charge	\$ 0
e. Total Cost to Government	\$ 232,000

Government Cost

The estimated annual cost to the Government is \$ 232,000. This figure is calculated by using the estimated number of annual respondents (5,800) x (1) frequency of annual responses x (1 hour) (time required to collect and process information) x \$ 40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). This figure includes the estimated overhead cost for printing, stocking, and distributing the form which is \$ 5,200.

Public Cost

The estimated annual public cost is \$44,573. This estimate is based on the number of annual respondents (5,800) x (1) frequency of annual responses x (0.25 hours) (15 minutes) per response x \$30.74 (average hourly rate).

15. There has been no increase or decrease in the estimated burden hours previously reported for this collection of information. There is no change to the information being collected.
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 the paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Sunday Aigbe
Chief,
Regulatory Products Division,
Office of the Executive Secretariat,
U.S. Citizenship and Immigration Services,
Department of Homeland Security.

Date