

**SUPPORTING STATEMENT FOR  
Registration for Classification as a Refugee  
OMB Control No.: 1615-0068  
COLLECTION INSTRUMENT(S): I-590, Registration for Classification as a Refugee**

**A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

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). A refugee is defined in section 8 U.S.C. 1101(a) (42) and Section 101(a)(42) of the Act.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Form I-590 is the primary document in all refugee case files and becomes part of the applicant's A-file. It is the application form by which a person seeks refugee classification and resettlement in the United States. It documents an applicant's legal testimony (under oath) as to his or her identity and claim to refugee status, as well as other pertinent information including marital status, number of children, military service, organizational memberships, and violations of law (if any). The I-590 is the document that demonstrates an applicant was interviewed by United States Citizenship and Immigration Services (USCIS) and records the decision made by the USCIS Officer as to whether the applicant should or should not be classified as a refugee for purposes of admission to the U.S. pursuant to INA Sec. 207. Each person included in the case must have his or her own I-590 form, regardless of age.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The Department of State is responsible for determining who has access to the U.S. Refugee Admissions Program (USRAP). Representatives from Resettlement Support Centers (RSCs), who are Department of State contractors serving overseas, help persons with access to the USRAP fill out the I-590. The completed form is presented to a

USCIS officer who reviews the form while interviewing the applicant to determine eligibility for classification as a refugee. The process does not lend itself to automation because the respondent must present the document in person for verification purposes. USCIS respectfully requests an exemption to the requirement for compliance to GPEA and asks for a three-year approval. USCIS is making an effort to upgrade all forms to full automation through the Transformation process, and will review the I-590 to determine if any parts of it are found to be amendable to electronic submission as other forms are converted.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information required to process the application for refugee status is not duplicated by any other USCIS collections.

5. **If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

There is no impact to businesses or other small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Section 101(a)(42) of the Act defines a refugee as a person who has suffered past persecution or has a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. Form I-590 requests the information necessary to determine an applicant's refugee claim. If the information on the Form is not collected, DHS will not be able to identify refugees eligible for admission to the United States pursuant to section 207 of the Act.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

On March 12, 2012, USCIS published a 60-day information collection notice in the Federal Register at 77 FR 14535. USCIS received no comments on the 60-day information collection notice. On June 8, 2012, USCIS published a 30-day information collection notice in the Federal Register at 77 FR 34053.

After publishing the 30-day information collection notice, USCIS received one comment from one individual regarding our request to extend Form I-590, Registration for Classification as a Refugee. The comment calls on the U.S. government to close down the U.S. Refugee Admissions Program (USRAP), citing the high cost of the program and the burden it places on U.S. taxpayers. The commenter also argues that refugees are leading to divisiveness in American society. The comment did not recommend any changes to Form I-590; rather, it simply recommends shutting down refugee processing.

The public comments will not result in any changes to Form I-590, Registration for

Classification as a Refugee. The decision to extend the I-590 is not related to any potential decision to suspend the USRAP. Under the Immigration and Nationality Act, Executive Branch officials review the worldwide refugee situation each year and project the extent of possible U.S. participation in the resettlement of refugees. Following consultations with cabinet representatives and Congress, a determination is drafted for signature by the President. The Presidential Determination establishes overall admissions levels and regional allocations for the upcoming fiscal year.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.**

There is no assurance of confidentiality. The information provided on the I-590, however, is not disclosed to the authorities in the country the applicant fled. The applicant is asked to sign a Release of Information Consent Form to facilitate the sharing of information with UNHCR, other U.S. Government agencies, and other resettlement countries. The decision to sign the consent form is voluntary. The system of records notice associated with this information collection is the Alien File, Index, and National File Tracking System of Records published on June 13, 2011 at 76 FR 34233. The associated privacy impact assessment is the Integrated Digitization Document Management Program (Dated January 5, 2007).

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to person's from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour**

burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or households	I-590 / Registration for Classification as a Refugee	100,000	1	.583 (35 mins)	58,300	\$30.74	\$1,792,142
<b>Total</b>		<b>100,000</b>			<b>58,300</b>		<b>\$1,792,142</b>

The wage rate category of “All Occupations” is used to determine the Average Hourly Wage Rate. The information is taken from the Bureau of Labor Statistics table, and the average hourly wage is \$21.96 x 1.4 (wage rate multiplier for benefits) totals \$30.74

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).
  - The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software;

monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.

There are no capital, start-up, operation or maintenance costs associated with this collection of information.

*For informational purposes, there are no fees associated with this collection of information.*

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

**Annualized Cost Analysis:**

a.	Printing Cost	\$	25,200
b.	Collection and Processing Cost	\$	2,332,000
c.	<b>Total Cost to the Government</b>	<b>\$</b>	<b>2,357,200</b>

**Government Cost**

**The estimated cost to the Government is \$2,357,200.** This figure is calculated by

multiplying the estimated number of respondents 100,000 x .583 hours (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.

**15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.**

There has been a decrease in the burden hours associated with this collection of information. This decrease of 23,320 burden hours is due to a lower figure of estimated number of respondents reported by USCIS at the present moment. USCIS previously reported an estimated figure of 140,000, while it now reports 100,000 estimated number of respondents. There are no changes to the information being collected.

**16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

This information collection will not be published for statistical purposes.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

USCIS will display the expiration date for OMB approval of this information collection.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.**

USCIS does not request an exception to the certification of this information collection.

**B. Collections of Information Employing Statistical Methods.**

There is no statistical methodology involved with this collection.