

**Supporting Statement**  
**Application for Citizenship and Issuance of Certificate Under Section 322**  
**(Form N-600K)**  
**OMB No. 1615-0087**

**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.**

The U.S. Citizenship and Immigration Services (USCIS) requires the information collected on the Application for Citizenship and Issuance of Certificate of Citizenship Under Section 322, Form N-600K to make a determination on whether the applicant has met the citizenship eligibility requirements under section 322 of the Immigration Nationality Act (INA). The general eligibility requirements are: age of the child of less than 18 years old, U.S. citizen parents or grandparents physical presence in the United States, proof of overseas residence of the child, and maintaining lawful admission to the United States while completing N-600K application process. The collected social security number may be used to match income tax returns, military service records, school records, and any other benefits that prove required physical presence in the United States. Upon approval of the application and taking of the Oath of Allegiance administration, if applicable, the child is declared to be a citizen of the United States and is issued a Certificate of Citizenship by USCIS.

USCIS's general legal authority to collect the social security number under INA sections 101 et. seq. (requires background checks be conducted for immigration benefits), 103(a)(1) and (3) (generally charges the Secretary of Homeland Security [Secretary] with the administration and enforcement of all laws relating to the immigration and naturalization of aliens and authorizes the Secretary to issue regulations, forms, and instructions and to perform such other acts as the Secretary deems necessary to exercise her INA authorities) and 264(f) (authorization to require any alien to provide the alien's social security number).

- 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 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. 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.**

Form N-600K is available at [www.uscis.gov/n-600k](http://www.uscis.gov/n-600k) and has partial Government Paperwork Elimination Act (GPEA) compliance as they can be accessed, completed and saved electronically. Supporting documents and/or fees must be submitted with the form and cannot currently be submitted electronically. USCIS is in the process of converting forms to be electronically accessed, completed and submitted by the respondent. At this time, there is no finalized timeframe for the form being submitted to be converted to the electronic environment but USCIS will provide an update when the information becomes available.

- 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.**

This collection of information is unique to USCIS and is not conducted elsewhere.

- 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.**

This collection of information does not have an impact on small 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 322 of the INA provides for the issuance of a Certificate of Citizenship to adopted minors 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 citizenship and receipt of a certificate of citizenship.

- 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.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

- 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.**

By notice in the Federal Register on December 3, 2012, at 77 FR 71609, USCIS notified the public that it was revising this information collection and allowed for a 60-day public comment period on the proposed revisions. USCIS received two comment submissions.

One public commenter expressed concerns about illegal immigration and foreign labor, which are beyond the scope of the notice. No changes were made to the form as a result of this comment.

The other public commenter stated that the form should include provisions for sons and daughters of World War II Filipino veterans who became US citizens. USCIS appreciates the comment. Applicants submitting this form must meet the

requirements at the time of filing and up to the administration of the Oath of Allegiance and issuance of the Citizenship Certificate. The effective date of the regulation particular to this form is not retroactive and, therefore, will not encompass any previous provision regarding citizenship.

By notice in the Federal Register on February 14, 2013 at 78 FR 10630, USCIS allowed for a 30-day public comment period on the proposed revisions. USCIS has not received any comments on the proposed revisions to date.

As part of the previous information collection request, USCIS had published a notice in the Federal Register on June 29, 2011, at 76 FR 38197, notifying the public that it was revising this information collection and allowing for a 60-day comment period. USCIS, then, had to postpone the implementation of the proposed revisions until the end of 2012 operationally, and as a result had converted the previous information collection request to extend without change the currently approved information collection request when it published the 30-day notice on September 19, 2011, at 76 FR 58029. USCIS is now moving forward with the planned revisions. USCIS addresses the public comments received in response to the 60-day revision notice published in the Federal Register at 76 FR 38197, on June 29, 2011, as follows:

Comment Summary By Issue (Date)	USCIS Response
<p>Commenter stated the form has added a section to ask an applicant where the applicant would like to be interviewed. However, the instructions do not emphasize that an applicant must chose an office apply before the age of 18 years of age when an applicant is no longer eligible for the Form N-600K benefit. Commenter also states that USCIS could charge an additional fee if the application needs to be expedited due to an applicant possibly “ageing out” and no longer being eligible for the Form N-600K benefit. (Date: June 29, 2011)</p>	<p>USCIS emphasizes in the Form N-600K instructions that USCIS must oath an applicant before he or she is 18 years of age. In fact, USCIS included a section called “When to File” highlighting the urgency that applicants must be under 18 years of age. USCIS reviews N-600K applications on a case by case basis and will endeavor to assist applicants who are close to “ageing out” and no longer being eligible for the Form N-600K benefit. Due to costs associated with modifying systems to support receipt of Form N-600K USCIS did not include that language in the form. However, USCIS will consider making this change to the form in future revisions.</p>
<p>Commenter notes USCIS added a section in Form N-600K requesting where an applicant would like to be interviewed and when yet the instructions do not provide information to assist an applicant to understand why USCIS is asking those questions. (Date: June 30, 2011)</p>	<p>USCIS has clarified Form N-600K instructions to explain to the applicant why USCIS is requesting this information. The revised Form N-600K also contains a section providing reason to an applicant for the interview location and date request.</p>
<p>Commenter provides Pub. L. 110-181</p>	<p>USCIS appreciates the public commenters</p>

<p>National Defense Authorization Act for Fiscal Year 2008 allowing USCIS to adjudicate Form N-600K for military dependents residing overseas who are on a parent's official military orders. (Date: June 30, 2011)</p>	<p>knowledge about the N-600K eligibility criteria as well as other aspects of the adjudication process. USCIS incorporated the public law into its processes by adjudicating Form N-600K applications for military dependents residing overseas who are on a parent's official military orders.</p>
<p>Based upon what USCIS can clearly understand, the commenter stated that the commenter's daughter filed a Form N-600K for her daughter based upon the commenter's status as the grandfather. However, the Department of State requires that the commenter's daughter provide proof that she does not intend to abandon her residence. Therefore, USCIS should draft a special entry form to allow for Form N-600K applicants to enter the United States. (Date: October 27, 2011)</p>	<p>It appears that the public commenter's daughter experienced difficulty when striving to obtain a visa to enter the United States. Unfortunately, USCIS and the Department of State do not currently have a process specific to Form N-600K applicants who require a visa to enter the United States. USCIS and the Department of State may consider this process in the future.</p>

**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 System of Record Notices associated with this information collection are [DHS-USCIS-007 - Benefits Information System September 29, 2008 73 FR 56596](#) and [DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records June 13, 2011, 76 FR 34233](#). The associated Privacy Impact Assessment is [DHS/USCIS/PIA-015 USCIS Computer Linked Application Information Management System \(CLAIMS 4\), September 5, 2008](#).

**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 persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information collection contains questions that are of a sensitive nature. Respondents also must provide SSNs. It is the law that a child (as an LPR) and his parents (either biological or adoptive) should have unique social security numbers (SSNs). The SSN functions as a unique numeric identifier that can be used by USCIS officers in ways that are more efficient and effective than other number identifiers, including the alien registration number (A-number). First, a subject can have more than one A-number. Often, a situation occurs in which a complete list of all A-numbers assigned to a subject is not provided. In such a scenario, reliance on A-numbers as the sole unique identifier can lead to false negatives regarding identity matching. Second, not all federal agencies are either aware of the meaning of an A-number or use it as a unique identifying trait. All federal agencies, however, recognize a SSN and the significant role it has come to play as a unique identifier. In addition, the parents or grandparents may be U.S. citizens and have no other unique identification number to use for verification within USCIS or outside systems. These records will help confirm the required physical presence in the U.S. of the qualifying relative to transmit U.S. citizenship.

In order to adjudicate an application, USCIS officers ascertain that the identity of the applicant is established in the record. They must verify the identity of the applicant and ensure that he or she has the relationship necessary to ensure benefit eligibility, and that there are no grounds of ineligibility. One critical means of accomplishing these functions remains the comparison of information provided by the applicant to public records and information within other government agency databases. Data fields used for comparison commonly include name, date of birth, and address. However, USCIS Officers frequently encounter common data among applicants, such as common family names or year-only birthdays. The SSN can be a critical field for such data comparison - especially useful in combination with other data points to either confirm the identity of the applicant where there are concerns or doubts. Or, it can be used to distinguish the identity of the applicant and prevent the co-mingling of data of two or more otherwise-unconnected people. This is especially important in cases where adjudications are performed without an interview of the applicant.

Once a subject receives naturalization, the burden for denaturalization shifts to the government, making the cost of mistakes high both in terms of integrity-based cost to the system as well as costs incurred during the federal litigation necessary to remove the illegitimately-acquired status. These costs can more easily be avoided through the inclusion of this data set. The SSN can be especially important when identity management is in play with national security based non-biometric identity and information management.

USCIS Immigration Officers and analysts perform checks to identify potential national security concerns. USCIS is called on to determine, sometimes without the benefit of firm biometric matches, whether an individual referenced in other government agency systems is in fact a match with the applicant before them.

The addition of the SSN could be quite helpful as a data point collected by the law enforcement and related communities for exactly these purposes. It is recognized and collected widely by law enforcement and is collected in national counterterrorism repositories of data.

For the same reasons, in cases involving screening of past or current and on-going criminal activity, and fraudulent activity relating to immigration benefits the SSN can be helpful. Utilizing the SSN to confirm or disprove a subject's identity is an integral part of the USCIS integrity assurance process in a select and limited but meaningful numbers of cases. Preventing a false positive match (i.e., improperly matching two individual subjects as the same individual) is just as important to the integrity of the immigration process as matching true hits. It is through the uniqueness of the SSN that USCIS is able to perform its identity resolution to a high level of precision whether performing this work within DHS systems or through inter-agency programs.

USCIS also serves as the custodian and record owner of the immigration history and status for all immigrants and former immigrants. Having the SSN on file for naturalized citizens and those who have derived citizenship allows USCIS to quickly and easily confirm that a USCIS record matches law enforcement or intelligence community request or request from state or local governments (the Systematic Alien Verification of Entitlements or SAVE Program) or employers (E-Verify), which can help us quickly confirm a subject's citizenship and immigration status, and helps ensure that a U.S. citizen subject is afforded all rights and protections provided by the law and the Constitution.

**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	Application for Citizenship and Issuance of Certificate Under Section 322 (N-600K)	3,242	1	1.583 (1 hour 35 minutes)	5,132	\$30.44	\$156,218.08
Individuals and Households	Passport-style Photographs	3,242	1	0.50	1,621	\$30.44	\$49,343.24
<b>Total</b>		<b>3,242</b>		<b>2.083 (2 hours 5 minutes)</b>	<b>6,753</b>		<b>\$205,561.32</b>

\* The above Average Hourly Wage Rate is the [May 2011 Bureau of Labor Statistics](#) average wage for “All Occupations” of \$21.74 times the wage rate benefit multiplier of 1.4 (to account for fringe benefits) equaling \$30.44. The selection of “All Occupations” (for example) was chosen as the expected respondents for this collection could be expected to be from any occupation.

**NOTES ON BURDEN:**

USCIS has sought comments in conjunction with other information collection requests on how the burden of the following information collection requirements affects respondents. USCIS will revise its burden estimates based on the public comments received, its own expert analysis, and informational resources.

1. Translations. Respondents might incur burden for translations of documents in foreign languages. USCIS will evaluate the burden associated with requiring translations of supporting documents.

2. Records. Respondents might need to provide records related to obtaining certificate of citizenship include photograph, birth certificate, evidence of lawful admission and maintenance of such lawful status, proof of required physical presence in the United States to demonstrate eligibility. There may be a burden associated with having to gather the required documentation.

**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 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. In addition, USCIS estimates that respondents will incur an estimated cost of \$10 to obtain the required passport-style photographs. Total cost to the respondent equals 3,242 respondents times \$10 equals \$32,420.

This information collection may impose some out-of-pocket costs on respondents in addition to the time burden for the form's preparation. USCIS has sought public comments on these subjects in connection with other information collections and will provide estimates in future submissions to OMB based on the results of public comments received and information that can be found from other resources on the following costs:

Translations. Respondents might incur expenses for translations of foreign documents or documents prepared or issued in foreign languages. USCIS is currently evaluating the estimated cost associated with this activity in connection with other information collections.

Preparers. Some respondents may hire third parties to assist in the request process and may incur costs to hire paid preparers for the preparation and submission of this form. USCIS is currently evaluating the estimated cost associated with this activity in connection with other information collections.

- 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	\$ 3,580
b.	Collecting and Processing	\$ 1,917,320
c.	Total Cost to the Government	\$ 1,920,900

**Government Cost**

USCIS establishes its fees using an activity-based costing model to assign costs to an adjudication based on its relative adjudication burden and use of USCIS resources. Fees are established at an amount that is necessary to recover these assigned costs, plus an amount to recover unassigned overhead (which includes the clerical, officer, and managerial time with benefits) and immigration benefits provided for free. As a consequence of USCIS immigration fees being based on resource expenditures related to the benefit in question, USCIS uses the fee associated with an information collection as a reasonable measure of the collection’s costs to USCIS. USCIS has established the fee for Form N-600K at \$600 for a biological child and \$550 for an adopted child.

The estimated cost of the program to USCIS is calculated by multiplying the estimated number of respondents (2,756 for biological children and 486 for adopted children) x (1) frequency of response x (\$600 for biological children and \$550 for adopted children) fee charge, to calculate the total estimated cost to USCIS (\$1,920,900). The fee charges include the average hourly rate for clerical, officer, and managerial time with benefits, and the estimated annual overhead cost for printing, stocking, distributing and processing of this form (\$3,242).

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

Data collection Activity/ Instrument	Program Change (hours currently on OMB	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
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	<b>Inventory)</b>					
N-600K				4,670	6,753	2,083
Passport-Style Photos				0	1,621	1,621
<b>Total(s)</b>				<b>4,670</b>	<b>8,374</b>	<b>3,704</b>

There has been an increase of 2,083 burden hours previously reported for this information collection from 4,670 to 6,753. This change can be attributed to the increase in the estimated number of respondents from 2,950 respondents to 3,242 based on updated statistical projection data for FY 2013 and the resulting adjustment in agency estimates. In addition, USCIS has added 30 minutes (0.5 hours) to account for the time burden to acquire passport-style photographs, resulting in an increase in the total estimated time burden from 1 hour 35 minutes for 2 hours and 5 minutes.

USCIS is revising the formatting of the form to make it more user-friendly and easier to complete and to accommodate enhancements to USCIS intake systems processing. USCIS is also revising the form to collect telephone numbers; e-mail addresses; and, for the qualifying relative or guardian, the social security number, Certificate of Citizenship number, and alien number, as applicable; U.S. Armed Forces membership information; and the foreign address of the preparer if applicable,

USCIS is revising the instructions to make it more user-friendly and clearer to applicants and to reflect current regulations. In the past, applicants' feedback indicated the instructions were difficult to understand thereby making the form difficult to complete. The effort to revise the form and instructions has been taken to respond to such feedback. This also will enhance USCIS's adjudication capabilities and its support to applicants. USCIS does not anticipate that these revisions overall will not result in any increase in time burden to complete the form as the main focus was reformatting to provide clarity and to make it easier for the applicants to complete.

<b>Data collection Activity/ Instrument</b>	<b>Program Change (cost currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (cost currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
N-600K				1,770,000	0	-1,770,000
Passport-Style Photos				\$0	\$32,420	32,420
<b>Total(s)</b>				<b>\$1,770,000</b>	<b>\$32,420</b>	<b>-1,737,580</b>

There is a change to the total public cost burden for this information collection based on an adjustment in agency estimates. The adjustment in public cost

burden for Form N-600K is based on a technical adjustment of excluding USCIS fees from public cost estimates because USCIS fees are more properly classified as transfers. The public cost burden for obtaining passport-style photos had not been previously accounted for but it is now being accounted resulting in the adjustment.

- 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.**

USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.

- 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.