

**SUPPORTING STATEMENT FOR
USCIS Electronic Immigration System (USCIS ELIS)
OMB Control No.: 1615-0122
COLLECTION INSTRUMENT(S): No Form**

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 Government Paperwork Elimination Act (GPEA), Public Law 105-277, 44 U.S.C. 3504 (1998) requires federal agencies to use and accept electronic signatures, where practicable, when conducting official business with the public. In addition, Congress passed the E-Government Act of 2002, [Public Law 107-347](#), 44 U.S.C. §§ 101, 3501, 3541, and 3601 notes (2002), to promote the use of the Internet and emerging technologies within and across Government agencies, provide citizen-centric Government information and services, reduce costs and burdens for businesses and other Government entities, promote access to high quality Government information and services across multiple channels, and transform agency operations by utilizing, where appropriate, best practices from public and private sector organizations.

As part of its ongoing effort to comply with GPEA and the E-Government Act of 2002, USCIS is transforming its business processes. USCIS continues to evaluate its data collection practices to improve the consistency and timeliness of its adjudications, as well as to support identity management, evaluate benefit eligibility, promote customer service, and manage national security and benefit risk. USCIS ELIS is one effort to achieve this improvement in the areas identified.

- 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.**

USCIS ELIS is one of the methods that USCIS uses to collect information from applicants, petitioners, representatives and others. The basic biographical questions for the respondent such as name, address, etc. is combined with data elements collected specifically to allow for an action to occur per the respondent's request. The use of the information, how it is used, and the purpose for it is explained within the individual collections that can be completed within ELIS. This submission only seeks to obtain approval for the shared biographical data elements; the remaining data requirements are approved for collection, and can be reviewed, by reviewing the OMB Control Number detail for the form in question.

The screenshots submitted with this collection are as follows:

Process Screenshots – These represent the process that I-539 and I-526 respondents utilize to complete the electronic versions of these forms.

New Process Screenshots – These represent the process that I-90 (and future form releases in USCIS ELIS) respondents will utilize to complete the electronic version of this form.

Current (USCIS) ELIS Account Setup – This represents the process that I-539 and I-526 respondents utilize to create an account that allows for access to complete the forms.

Alternate (USCIS) ELIS Account Setup for Identity and Credentialing Management – This represents the process for the I-90 (and future form releases in USCIS ELIS) respondents to set up an account that will allow them access to complete the form.

The combination of the Process Screenshots and Current (USCIS) ELIS Account Setup will have the same questions and time burden as that of the combination of the New Process Screenshots and Alternate (USCIS) ELIS Account Setup. The only difference is the point at which the respondent will encounter the data elements in the overall process; for example the Alternate (USCIS) ELIS Account Setup (also known as ICAM) will be limited to the Name, email address, and mobile phone number data elements along with the security questions to allow for future access if account name and/or password are forgotten. The I-90 is the first form to employ this variation and future forms made available in USCIS ELIS will also follow this format. The I-539 and the I-526 will eventually share this process as well when updates are made to the backend collection procedure.

The Immigrant Visa Payment process remains unchanged.

- 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 use of this electronic information collection system provides for compliance with the Acts cited above. To the fullest extent possible when not required by statute or due to limitations of the information required, USCIS will allow for online data entry as well as for electronic submission of supporting documentation.

- 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 entered within USCIS ELIS will be unique to the application, petition or request submitted by the respondent and as each form has its own OMB Control Number, the response to any duplication can be found in that associated control number collection.

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.

The information entered within USCIS ELIS will be unique to the application, petition or request submitted by the respondent and as each form has its own OMB Control Number, the response to any impact to small businesses or other small entities can be found in that associated control number collection.

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.

The information entered within USCIS ELIS will be unique to the application, petition or request submitted by the respondent and as each form has its own OMB Control Number, the response to any consequence to Federal Program can be found in that associated control number collection.

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.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

No public comment has been solicited as this request is a non-substantial change to the existing collection.

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

USCIS does not provide any payment for 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 provided to the respondents. The information collected is covered in the associated published system of record notices [DHS-ALL-037-E-Authentication System of Records, DHS-USCIS-007 - Benefits Information System, and DHS-USCIS-001 – Alien File (A-File) and Central Index System (CIS),

which can be found at www.dhs.gov/privacy]. Additional System of Records Notices associated with this information collection are DHS/USCIS/PIA-041 – ELIS-1 Temporary Accounts and Draft Benefit Requests dated May 16th, 2012, DHS/USCIS/PIA-042 – ELIS-2 Account and Case Management dated May 16th, 2012, and DHS/USCIS/PIA-043 – ELIS-3 Automated Background Functions dated May 16th, 2012. The associated Privacy Impact Assessment are DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records June 13, 2011, 76 FR 34233, DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596, and DHS/USCIS-015 - Electronic Immigration System-2 Account and Case Management System of Records, November 15, 2011, 76 FR 70739.

- 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.**

There are no questions of a sensitive nature within this collection.

- 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	Form	No. of	No. of	Avg.	Total	Avg.	Total
---------	------	--------	--------	------	-------	------	-------

Respondent	Name / Form Number	Respondents	Responses per Respondent	Burden per Response (in hours)	Annual Burden (in hours)	Hourly Wage Rate*	Annual Respondent Cost
Individuals or Households	USCIS ELIS / No Form	58,500	1	2.25	131,625	\$31.26	\$4,114,598
Individuals or Households	USCIS Intake Page for Pay.gov	500,000	1	.167	83,333	\$31.26	\$2,604,990
Total		558,500			131,625		\$6,719,588

* The above Average Hourly Wage Rate is derived from the May 2013 Bureau of Labor Statistics Mean Hourly Wage for "All Occupations". The wage rate of \$31.26 is calculated from the base average wage rate of \$22.33 times the wage rate benefit multiplier of 1.4. The selection of "All Occupations" represents the possibility that respondents can be employed in any type of work; the collection is not targeting any specific category of employment.

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 costs to the respondents associated with this collection. Any costs are captured within the OMB Controlled collections that can be filed through USCIS ELIS.

- 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.**

Any costs to the Federal Government are captured within the OMB Controlled collections that can be responded to within USCIS ELIS.

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

There are no changes to items reported in Questions 13 or 14 of the OMB Form 83-I.

- 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.