

## **SUPPORTING STATEMENT**

### **Civics and Citizenship Toolkit/Teacher Training Registration**

#### **Forms G-1190 and OMB-58**

OMB Control No. 1615-0120

#### **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 312 of the Immigration and Nationality Act requires immigrants aspiring for U.S. citizenship to have a “knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States.”

Section 451 of the Homeland Security Act of 2002 (Public Law 107–296) requires U.S. Citizenship and Immigration Services (USCIS), to promote instruction and training on citizenship rights and responsibilities, including the development of educational materials.

To comply with these requirements, USCIS developed a citizenship toolkit and training seminars.

- 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 toolkit is provided free to organizations that serve, or that are interested in serving, immigrants. The toolkit includes immigration and civics publications, handbooks, multimedia tools and guidance on how to use these products to help legal permanent residents integrate into their local communities and American society.

Adult educators and volunteers who work with immigrants may use the publications, videos and curriculum in the toolkit to teach American history, civics and citizenship in a classroom setting. Immigrants may also use the toolkit as a self-study resource to learn more about the United States and prepare for the naturalization process.

In addition, USCIS provides free training seminars and conferences for:

- Adult English as a Second Language (ESL),
- Civics and citizenship teachers, volunteers, and immigrant-serving organizations to enhance their skills in teaching U.S. history, civics, and the naturalization process to immigrant students.

These training opportunities will include sessions on the new naturalization test, the naturalization process, instructional methods and activities for teachers, and an overview of the Office of Citizenship's resources and materials.

Individuals and organizations wishing to obtain a toolkit or training must complete and submit a registration form to USCIS.

- 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 registration form for the toolkit resides on the USCIS Web site at

[www.uscis.gov/citizenshiptoolkit](http://www.uscis.gov/citizenshiptoolkit). The electronic form is hosted by the U.S.

Government Printing Office and can be completed and submitted electronically to

USCIS. The electronic form resides at

<http://www.citizenshiptoolkit.gpo.gov/Registration>.

To register for training an applicant can complete the form on the USCIS Website at [http://www.uscis.gov/sites/default/files/USCIS/Teacher\\_Training/G-1190](http://www.uscis.gov/sites/default/files/USCIS/Teacher_Training/G-1190), print the completed form, and fax/email to USCIS.

- 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.**

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. 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.**

If the information is not collected USCIS will not be able to enroll an applicant or organization for training or distribute the toolkit.

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.**

On June 4, 2014, USCIS published a 60-day notice in the Federal Register at 79 FR 32306. USCIS receive one comment on the 60-day notice. On August 13, 2014, USCIS published a 30-day notice in the Federal Register at 79 FR 47472. USCIS did/ did not receive any comments on the 30-day notice.

Below is a summary of the comment received on the 60-day notice and USCIS response:

USCIS acknowledges the receipt of the comment. The comment was not germane to teacher training, or Form G-1190. It expressed the commenter's view of illegal immigrants and admission of immigrants to the United States.

The commenter stated that USCIS should charge a fee for illegal immigrants to attend the training.

USCIS notes that teacher training workshops and seminars are for adult education teachers and program administrators who prepare Legal Permanent Residents for their citizenship test and interview. The teacher trainings assist teachers in developing effective curricula, lesson plans, and activities as well as learning about the legal process of naturalization.

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 records notices associated with this information collection is Department of Homeland Security Mailing and Other Lists System of Records, published at 73 FR 71659 on November 25, 2008.

The associated privacy impact assessment is Department of Homeland Security General Contact List, June 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 Projected 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	Toolkit Registration	1,200	1	10 mins. (.166 hrs.)	200	\$31.2669	\$6,227
Individuals or households	Teacher Training Seminars Registration	1,100	1	10 mins. (.166 hrs.)	183	\$31.26	\$5,708
Total		<b>2,300</b>			<b>383</b>		<b>\$11,935</b>

*The above Average Hourly Wage Rate is the [May 2013 Bureau of Labor Statistics](#) average wage for “All Occupations” of \$22.33 times the wage rate benefit multiplier of 1.4 (to account for fringe benefits) equaling \$31.26. The selection of “All Occupations” (for example) was chosen as the expected respondents for this collection could be expected to be from any occupation.*

**Total annual reporting burden hours for Toolkit Registration is 200.** This figure is based on multiplying the number of respondents (1,200) x (1) frequency or response x .166 (10 minutes) per response.

The projected hours per response for this collection of information were derived by first breaking the process into two basic components:

Learning how to order the toolkit: 8 minutes

Completion of the form: 2 minutes

Total hours per response: 10 minutes

**Total annual reporting burden hours for Training Seminars Registration is 183.** This figure is based on multiplying the number of respondents (1,100) x (1) frequency or response x .166 (10 minutes) per response.

The projected hours per response for this collection of information were derived by first breaking the process into three basic components:

Reading instructions:	2 minutes
Completion of the form:	3 minutes
Faxing/emailing the completed form	5 minutes
Total hours per response:	10 minutes

**Total annual reporting burden is 383.**

**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.

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	\$	0
b.	Collecting and Processing	\$	7,636
c.	Total Cost to Program	\$	7,636
d.	Fee Charge, if any	\$	0
e.	Total Annual Cost to Government	\$	7,636

**Government Cost**

**The estimated cost of the program to the Government is \$7,636.** This figure is calculated by multiplying:

- The number of respondents applying for the toolkit (1,200) x (1) number of responses x .083 (5 minutes) x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits); plus
- The number of respondents applying for training (1,100) x (1) number of responses x .083 (5 minutes) x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits).

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 Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
G-1190, OMB-58				1,345	383	(962)
<b>Total(s)</b>				<b>1,345</b>	<b>383</b>	<b>(962)</b>

The annual burden hours has decreased from 1,344 annual burden hours to 382.

This is as a result of an adjustment in the agency estimate of the number of registrants for the Toolkit from 7,000 to 1,200.

A few words were changed on Form G-1190 to stay consistent with the Office of Citizenship’s teacher training description on the Citizenship Resource Center website. The words did not change the meaning of the description of the form.

The word “workshops” was changed to “seminars”, and the word “Special” was inserted to specify the type of accommodation that participants can request.

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 OMB expiration date for 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. Collection of Information Employing Statistical Methods**

There is no statistical methodology involved with this collection.