

**SUPPORTING STATEMENT FOR  
Alien's Change of Address  
OMB Control No.: 1615-0007  
COLLECTION INSTRUMENT(S): Form AR-11**

**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 265(a) of the Immigration and Nationality Act (INA) requires all aliens within the United States who are subject to registration requirements at INA §§ 221(b), 262 or 263 to notify U.S. Citizenship and Immigration Services (USCIS), in writing, of each change of address, within 10 days from the date of change.

- 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 AR-11, Alien's Change of Address Card, provides a standardized format for compliance with section 265(a) of the INA. The Form AR-11SR, Alien's Change of Address Card, has been used to report changes of address of aliens subject to "special registration" requirements contained in INA 263 and 8 CFR 264.1(f). USCIS is now proposing to eliminate Form AR-11SR. (Please see response under question 15 below for more information).

- 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 these forms provides the most efficient means for collecting and processing the required data. These forms reside on the USCIS Web site and can be completed electronically and can be e-filed. The url for e-filing is <https://egov.uscis.gov/crisgwi/go?action=coa.Terms>.

- 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 the USCIS Forms Inventory Report revealed no duplication of efforts. There is no similar information currently available that 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, aliens will not be able to comply with the requirement of section 265(a) of the INA to submit their change of address to USCIS within 10 days from the date of change.

- 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.**

On October 28, 2014 USCIS published a 60-day notice in the *Federal Register* at 79 FR 64208. USCIS received a comment after publishing that notice.

The commenter is of the opinion that “there are a couple of questions on the form that are either irrelevant or could confuse the people who need to provide notice of an address change to USCIS.” Specifically, the commenter states that the question regarding an alien’s immigration status “is not relevant to a change of address and could deter individuals from reporting a new address...” USCIS believes this question is relevant as an alien’s immigration status in the United States dictates whether they are subject to registration requirements, and change of address obligations.

The same commenter suggested that whether an applicant is subject to special registration at INA § 263 is not relevant because the change of address obligation for an

alien subject to special registration is the same as that for any alien required to be registered by INA §§ 201(b) and 262. USCIS agrees with this comment and will delete this question. If, in the future, the Secretary designates a certain group(s) for special registration, the AR-11 may be revised to capture the additional reporting requirements at 8 CFR 264.1(f)(5), i.e. any change in address, place of employment or educational institution.

On December 30, 2014, USCIS published a 30-day notice in the *Federal Register* at 79 FR 78464. USCIS has not received comments on that notice to the date.

**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. The system of record notice associated with this information collection is United States Citizenship and Immigration Services Benefits Information System, which was published in the *Federal Register* on September 29, 2008, at 73 FR 56596. The privacy impact assessment associated with this information collection is USCIS Alien Change of Address Card (dated October 21, 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.**

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	AR-11 (Paper)	360,000	1	0.20 hours (12 minutes)	72,000	\$31.26	\$2,250,720
Individuals or Households	AR-11 (Electronic)	1,200,000	1	0.10 hours (10 minutes)	120,000	\$31.26	\$3,751,200
Total		1,560,000			192,000		\$6,001,920

\* 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.

**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 is no capital, start-up, operational or maintenance cost associated with this collection of information. There is no fee cost to respondents for these submissions. USCIS estimates that respondents will incur an estimated out of pocket cost of \$3.75 average postage cost associated with the paper-based submission of the completed request to USCIS.

USCIS estimates that only 360,000 respondents will submit the paper-version of the request. The postage to mail completed package (360,000 x \$3.75 average postage) = \$1,350,000.

- 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:**

Printing Cost	\$	1,064
Collection and Processing Cost		7,678,936
<b>Total Cost to Government</b>	<b>\$</b>	<b>7,680,000</b>

**Government Cost**

**The estimated cost to the Government is \$7,680,000.** This figure was derived by adding the estimated number of respondents that file the form by mail using the paper-format version of the collection (360,000) x .20 hours (12 minutes) (time required to collect and submit information) x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits); and the estimated number of respondents that file the form electronically (1,200,000) x .10 hours (6 minutes) (time required to collect and submit 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 \$1,064.

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

<b>Data collection Activity/ Instrument</b>	<b>Program Change (hours currently on OMB Inventory)</b>	<b>Program Change (New)</b>	<b>Difference</b>	<b>Adjustment (hours currently on OMB Inventory)</b>	<b>Adjustment (New)</b>	<b>Difference</b>
AR-11 (Paper)	59,760	72,000	+12,240	.083 hours (5 minutes)	.20 hours (12 minutes)	+.117 hours
AR-11 (Electronic)	0	120,000	0	0	.10 hours (6 minutes)	+.10 hours
<b>Total(s)</b>	<b>59,760</b>	<b>192,000</b>	<b>+12,240</b>	<b>.083 hours</b>		

The changes in estimates reflected above are due to better, new estimates regarding the number of respondents that file the collection, either via mail or electronically, and revised estimates regarding the time burden associated with each type of submission. Although during the last revision cycle USCIS disclosed the availability of the electronic filing option, it did not disclose the time burden associated with it. USCIS currently estimates that it takes a respondent approximately 12 minutes to request a change of address with USCIS by mail, while it would only take 6 minutes to do it electronically. The current estimate for the number of respondents filing such a request has increased,

which evidences better compliance with this requirement and provides a more accurate estimate report based on improved tracking mechanisms. USCIS previously reported a total number of 720,000 individuals filing changes of address requests, while it now reports that it might receive approximately 1,200,000 electronic change of address submissions and 360,000 requests filed by mail.

USCIS is revising the collection to ease the burden on customers filing requests for change of address by eliminating the optional address fields for school and work. Both of those sections are seldom used by customers. Additionally, the revisions to the collection include adding new fields so customers can distinguish a mailing address from a physical address. The tendency has been to only provide a mailing address, which undermines the use of the form by Immigration and Customs Enforcement and other law enforcement entities to physically locate aliens.

USCIS is also eliminating the Form AR-11SR to reduce the time burden that some individuals might encounter while trying to report a change of address

USCIS is now disclosing the cost per respondent for mailing the AR-11 card. The cost is now being captured but it is not new or a revision to the collection. Please see the response to Question 13 for more information.

- 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.