

**SUPPORTING STATEMENT FOR
USCIS Identity and Credentialing Access Management (ICAM)
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.

To meet this goal, the United States Citizenship and Immigration Services (USCIS) has established a portal for persons interested in interacting with the agency through an electronic medium. This electronic system is known as the Identity Credential and Access Management (ICAM) system and it will establish one account for them with all of USCIS. This will then allow those persons to log into USCIS as a whole and more easily enter the system which they wish to interact with (these systems may require their own additional information for further interaction and a separate OMB Control Number, or Numbers, would represent these collections). Various sections of the Immigration and Nationality Act (INA) provide the authority for the USCIS to conduct collections of information as required by law, and this also grants the ability for the agency to collect the information necessary to establish the account.

- 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 ICAM will be accessed by persons who wish to interact with certain systems within the USCIS agency. This system will be an account-creation and system-access portal that will, upon first access, require the person to enter a valid email address to which the agency will send an automated email with instruction on how to complete the

account set-up process. This creation process requires the minimal amount of information necessary to establish an account and once the account is active, the person will then return to this portal to interact with the systems that are fed from this system by entering their user information. The respondents will also be able to update their account information as necessary. Once this information is confirmed, the available options will be presented for selection. Currently the only system which will interact with ICAM is the USCIS Electronic Information System (USCIS ELIS) which is the electronic data entry portal for USCIS forms, but in the future, as other systems are connected to ICAM, persons interacting with USCIS will only need to log in once and then will be able to move through the multiple systems.

- 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 ICAM will be unique to the person creating an account and once established, they will not need to re-enter that data again.

- 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 ICAM will be required from certain business and other small entities, such as attorneys. The information necessary to be collected is as small as possible to avoid unnecessary burden.

- 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 ICAM and for payment of the Immigrant Fee will be unique to the application and is necessary to allow for persons to interact electronically with USCIS and to pay immigrant visa fees.

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 20, 2014, USCIS published a 60-day notice in the Federal Register at 79 FR 62649. USCIS did not receive comments after publishing that notice. On January 22, 2015, USCIS published a 30-day notice in the Federal Register at 80 FR 3246. USCIS did not receive comments.

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]. The associated Privacy Impact Assessment 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. Additional System of Records Notices associated with this information collection 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 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	USCIS ICAM	2,335,000	1	0.167	389,945	\$31.26	\$12,189,681
Business or other for-profit	USCIS ICAM	465,000	1	0.167	77,655	\$88.10	\$6,841,406
Total		2,800,000			467,600		\$19,031,086

** The above Average Hourly Wage Rate is derived from the May 20143 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.

The increase in the number of respondents for the USCIS ICAM collection represents the estimate that USCIS is updating due to its efforts to make more forms available via the online MyUSCIS portal. This estimate includes the current estimate for form I-90 respondents, the future estimate for Immigrant fee paying respondents, and the estimated future respondents creating accounts in ICAM as more forms become available for electronic submission via MyUSCIS.

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 that necessitate an account creation.

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 for which the respondent creates an account in USCIS ICAM.

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
USCIS ELIS (131,625 total time reported less 9,770 allotted to USCIS ELIS account creation)	121,855	0	(121,855)			
USCIS ICAM (9,220 represented account creation burden for USCIS ELIS process)	9,770	467,600	457,830			
Intake Page for pay.gov	83,333	0	(83,333)			
Total(s)	214,958	467,600	252,642			

The burden for the USCIS ELIS collection activity is removed per the discussion following this paragraph. The burden for the USCIS ICAM includes burden previously approved for the account creation process that was included in the activity labeled “USCIS ELIS”, which was for 58,500 respondents times .167 hours per response = 9,770

total hours. The additional hour burden for USCIS ICAM is due to the availability of more USCIS forms becoming available for electronic filing via MyUSCIS. The elimination of burden for the Intake Page for pay.gov is due to the transfer of this burden to the new collection USCIS Electronic Payment Processing, OMB Control Number 1615-NEW.

This collection of information currently includes the burden estimated for the completion of the “biographic portion” of the USCIS Forms I-526 and I-539 collected in USCIS ELIS. The 131,625 hours of burden are removed from the inventory; see the following paragraphs for an explanation. USCIS has also estimated an increase in the number of respondents who will create accounts via USCIS ICAM and who will be making Immigrant Fee payments. This increase in respondents results in an increase in 119,615 hours of burden. Overall, there is a net increase in burden hours for this collection of 71,323 hours. Finally, USCIS is modifying the title of this collection to reflect the remaining activities covered by it.

USCIS ELIS, initially launched in May, 2012 allows customers to e-file certain categories of the Form I-539, Application to Change/Extend Nonimmigrant Status and the I-526, Immigrant Petition by Alien Entrepreneur. As USCIS began work to incorporate more forms into USCIS ELIS, the agency found that development in USCIS ELIS was complicated and slow because the system relied on complex proprietary software that was proving difficult to customize in order to meet the agency’s needs and to efficiently and effectively serve the responding public.

Continuing to invest in the original software that supported the USCIS ELIS system would not support the long-term agency goal of moving to a simplified architecture and improving internal processes that would translate to a better experience for the public. Therefore, USCIS decided to acquire open source software that was functional in a cloud-based technology, aligning itself with industry best practices to improve development times, processing and scalability.

Unfortunately, the current builds of the forms I-539 and I-526 are not compatible with the new software and each requires a full development project cycle to make them available in the new system. With competing priorities within the agency of ongoing development of other forms, USCIS has made the difficult decision to discontinue the electronic Form I-539, Form I-526 effective June 16th, 2015 until they can be redesigned and rebuilt in the new system. This change will not adversely affect customers with pending Form I-539 or Form I-526 cases in USCIS ELIS and USCIS will adjudicate their cases to completion. The Form I-90, Application to Replace Permanent Resident Card, is the first benefit request deployed in this new architecture and USCIS will continue to add functionality and forms in the coming months and years.

The burden for the intake page for pay.gov is now covered by the collection OMB Control Number 1615-0131, which captures all burden for any electronically submitted

payments to USCIS.

- 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.