

**SUPPORTING STATEMENT FOR  
BIOGRAPHIC INFORMATION  
OMB Control No.: 1615-0008  
COLLECTION INSTRUMENT(S): G-325A, G-325C**

**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.**

Applicants seeking various benefits under immigration laws, granted by the U.S. Citizenship and Immigration Services (USCIS), such as adjustment of nonimmigrant status to that of person admitted for permanent residence must provide the information requested through these forms. Security requirements dictate that certain biographic information be obtained from persons seeking certain immigration benefits for submission to other agencies (Federal Bureau of Investigation, Central Intelligence Agency, Department of State or Department of Defense) to ensure that USCIS's action is in the best interest of the United States. **Authority:** 8 CFR 207.2, 8 CFR 245.2(a)(3)(i), 8 CFR 328.4.

- 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 uses the biographical information provided through these forms to check other agencies records on applications or petitions submitted by respondents seeking certain benefits under the Immigration and Nationality Act (Act).

Specifically:

- Form G-325A: This form is submitted along with:
  - Form I-485, Application to Adjust Status to Permanent Resident. Respondents that wish to become U.S. legal permanent residents must provide USCIS further information to be able to establish eligibility under U.S. immigration laws. Form I-485 is approved for use under OMB Control Number 1615-0023.
  - Form I-130, Petition for Alien Relative. Citizens or lawful permanent residents of the United States to establish the relationship to certain alien relatives, who wish to immigrate to the United States, may file this form. This form is currently approved for use under OMB Control Number

1615-0012.

- o Form I-129F, Petition for Alien Fiancé(e). A respondents may use this form to petition to bring his or her fiancé(e) (K-1) and that person's children to the U.S. for marriage to him or her or to bring his or her spouse and that person's children (K-3 and K-4 visas, respectively) to the United States to complete processing for permanent resident status (under the LIFE Act and Amendments of 2000).

Form G-325C: This form is submitted along with Form I-590, Registration for Classification as a Refugee. Respondents seeking refugee status must provide certain type of information to establish refugee status eligibility in accordance with 8 CFR 207.2(a). Form I-590 facilitates that process. That information collection is approved for use under OMB Control Number 1615-0068.

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 forms are available online at [www.uscis.gov](http://www.uscis.gov) where the respondent can complete the form and print it for mailing to USCIS. The forms cannot currently be submitted electronically.

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.**

USCIS is in the process of either incorporating the unique data elements from the relevant G-325 series form into the parent form that requires it. As this occurs in the future, USCIS will submit a request to remove that form from the inventory.

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.**

These forms do not impact 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.**

The use of these forms provides the most expedient means to support the mission of the USCIS as it relates to the grant of specific immigration benefits such as applications for

naturalization, refugee status and adjustment of status. The form provides U.S. government officials with specific biographic information not captured on other forms, such as employment history, previous places of residence, and information about parents and ex-spouses. These forms assist other federal agencies in the search of relevant information pertaining to individuals seeking immigration benefits.

**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 December 17, 2014 USCIS published a 60-day notice in the Federal Register at 79 FR 75172. USCIS did receive 1 comment after publishing that notice. On February 24, 2015, USCIS published a 30-day notice in the Federal Register at 80 FR 9740. USCIS did not receive comments.

The comment received request that USCIS consider modifying the terms used within the form to label the data elements “Name of Father” and “Name of Mother”. USCIS strives to ensure that all applicants have equal access to all of its programs and we always work to make our forms as clear and inclusive as possible. The G-325 series of forms serve applicants from a wide variety of cultures, backgrounds, and experiences, and we must use language that will lead to the most accurate data collection possible, while minimizing the burden on applicants and protecting their privacy. Therefore, we use terminology that is widely understood to request the information needed to properly adjudicate each claim, with the least amount of ambiguity possible. The language on the G-325 series of forms is standard language used on all immigration forms, and does not prohibit potentially eligible applicants from applying for an immigration benefit using this form. We appreciate the comment and while we are making no changes in response to the comment at this time, we will consider it as well as all input from stakeholders in future revisions of our forms.

**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 associated system of records notice for this information collection is United States Citizenship and Immigration Services Benefits Information System, published in the Federal Register on September 29, 2008 at 73 FR

56596. The related privacy impact assessment is USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum dated September 5, 2008. The information on the G-325C, however, is not disclosed to the authorities of the country a refugee applicant fled. The applicant is asked to sign Release of Confidentiality Form to facilitate the sharing of information with UNHCR, other U.S. Government agencies, and other resettlement countries. The decision to sign the consent form is voluntary.

- 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
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Individuals or Households	G-325A	565,180	1	0.250	141,295	\$31.26	\$4,416,882
Individuals or Households	G-325C	100,000	1	0.250	25,000	\$31.26	\$781,500
Total		665,180			166,295		\$5,198,382

*\* The above Average Hourly Wage Rate is derived from the May 2014 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 in the collections of information that this form is filed with.

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	\$ 3,131
b.	Collection and Processing Cost	\$ 6,651,800
c.	Total Cost to Program	\$ 6,654,931

**Government Cost**

**The estimated cost to the government is \$ 6,654,931.** This figure was derived after adding the costs associated with each form, which were obtained by multiplying the estimated number of respondents associated with each particular form x (1) number of responses associated with each form x the time required to collect and process the information collected through each form 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 currently is \$3,131.

- Government Cost associated with Form G-325A is \$5,651,800: This figure is derived by multiplying 565,180 (the estimated number of respondents) x 1 (number of responses) x .25 hours (the time required to collect and process the information collected through this form) x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits); PLUS
- Government Cost associated with Form G-325C is \$1,000,000: This figure is derived by multiplying 100,000(the estimated number of respondents) x 1 (number of responses) x .25 hours (the time required to collect and process the information collected through this form) x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits); PLUS
- Estimated overhead cost for printing, stocking, and distributing the form: \$3,131.

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-325				2,767	0	(2,767)
G-325C				309,896	0	(309,896)
<b>Total(s)</b>				<b>478,957</b>	<b>166,295</b>	<b>(312,662)</b>

The reduction in hour burden is due to the elimination of the G-325 and G-325B submission requirements with the form N-400; they are now integrated into that form and do not need to be filed separately (variance of 1 hour due to rounding). There are no changes to the information collected or to the instructions.

- 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.