

## SUPPORTING STATEMENT A

**Department of Homeland Security  
Office of the Citizenship & Immigration Services Ombudsman  
Customer Satisfaction and Needs Assessment Survey  
DHS Form – XXXX (new)**

OMB No. 1601-NEW

### **A. Justification:**

1. The Citizenship and Immigration Services (CIS) Ombudsman was created under section 452 of the Homeland Security Act of 2002 (Public Law 107-296) to: (1) assist individuals and employers in resolving problems with the U.S. Citizenship and Immigration Services (USCIS); (2) identify areas in which individuals and employers have problems in dealing with USCIS; and (3) propose changes, to the extent possible, in the administrative practices of USCIS to mitigate problems.
2. The information collected on this form will allow the CIS Ombudsman to obtain feedback from the general public to assess the needs of customers to and identify improvement opportunities for Ombudsman services. The data collection instrument does not solicit or collect Personally Identifiable Information (PII).
3. The use of this survey provides the most efficient means for collecting and processing the required data. In the future, the Ombudsman will employ the use of information technology in collecting and processing this information by offering the option to complete the survey online. Per PRA requirements, a fillable PDF version of the survey will continue to be provided on the Ombudsman's website. The survey can be completed in PDF format, and faxed or sent as an attachment by email or in paper format by regular mail to the Ombudsman's office at the address indicated on the survey. After approval of the survey detailed in this supporting statement, the online survey will be posted on the Ombudsman's website at <http://www.dhs.gov/topic/cis-ombudsman>.
4. A review of the DHS Forms Inventory Report revealed no duplication of effort, and there is no other similar information or survey currently available which can be used for this purpose.
5. This information collection does not have an impact on small businesses or other small entities.
6. If this information is not collected the Ombudsman will not be able to assess the needs of customers to improve Ombudsman services and offer more efficient and effective alternatives.

7. There are no special circumstances that are applicable to this information collection.
8. A 60 Day Federal Register Notice requesting public comments was published on Monday, November 9, 2015, 80 FR 69241. CISOMB received one comment after publishing that notice. The comment received was not relevant to the subject of this information collection.  
  
A 30 Day Federal Register Notice requesting public comments was published on Monday, February 22, 2016, 81 FR 8737. No comments were received.
9. The Ombudsman does not provide payments or gifts to respondents in exchange for a benefit sought.
10. The assurance of confidentiality provided to the respondents for this information collection is provided by: (a) The Ombudsman statute and mandate as established by Homeland Security Act Section 452; (b) Privacy Act of 1974; and (c) The DHS Privacy Office has reviewed the entire package of documents for this information collection. This collection is covered by a Privacy Threshold Assessment adjudicated by the DHS Privacy office on March 26, 2015.

The Ombudsman Customer Satisfaction and Needs Assessment Survey will be in compliance with all applicable DHS Privacy Office, DHS CIO, DHS Records Management, and OMB regulations regarding data collection, use, storage, and retrieval. The proposed public use data collection system is therefore intended to be distributed for public use primarily by electronic means with limited paper distribution and processing of paper forms.

The Ombudsman Customer Satisfaction and Needs Assessment Survey has been constructed in compliance with regulations and authorities under the purview of the DHS Privacy Office, DHS CIO, DHS Records Management, and OMB regulations regarding data collection, use, sharing, storage, information security and retrieval of information.

In accordance with the Privacy Act of 1974, the Department of Homeland Security is giving notice that there is no requirement to establish a system of records notice as the participation in the survey is voluntary and no Personally Identifiable Information will be collected. The Citizenship and Immigration Services Ombudsman will continue to ensure the efficient and secure processing of information to aid in assessing the needs of customers to improve Ombudsman services and offer more efficient and effective alternatives. The office intends to use the results of the survey (qualitative statements) received to consider how to improve operations and customer service. The information received is not envisioned at this time to be used to justify reallocation of resources or to change policies in any way.

11. There are no questions of a sensitive nature.

12. Annual Reporting Burden:

a.	Number of Respondents	8,800
b.	Number of Responses	1
c.	Total Annual Responses	8,800
d.	Hours per Response	30 Minutes
e.	Total Annual Reporting Burden	4,400 Hours

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

Learning about the Law and the Survey:	7.5 Minutes
Completion of the Survey:	15 Minutes
Assembling and Sending the Survey:	7.5 Minutes

Total Hours per Response 30 Minutes

**Total annual reporting burden hours is 4,400.** This figure was derived by multiplying the number of respondents (8,800) x frequency of response (1) x hours per response (.5 hour). A subsequent computation of annual reporting burden hours will occur when the online survey is developed and will also factor in survey use resulting from the Ombudsman's outreach activities informing and educating the public about the survey.

**Public Cost**

**The estimated annual public cost is \$108,416.** This figure is calculated by multiplying the number of respondents 8,800 x .5 hour (0.5) per response x \$24.64/hour fully-loaded wage rate [\$17.60 (median hourly rate) x 1.4 benefit multiplier = \$24.64/hour]. This rate was derived from the May 2015 Bureau of Labor Statistics using the median hourly wage of \$17.60 from the Table for all occupations [http://www.bls.gov/oes/current/oes\\_nat.htm#39-0000](http://www.bls.gov/oes/current/oes_nat.htm#39-0000). The wage rates are fully-loaded accounting for benefits and overhead [assuming a 1.4 benefit multiplier].

13. There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this collection are identified in question 13.

14. Annualized Cost Analysis:

a.	Printing Cost	\$ 0
b.	Collecting and Processing	\$ 176,000

c. Total Cost to Program	\$ 176,000
d. Fee Charge	\$ 0
e. Total Annual Cost to Government	\$ 176,000

**Government Cost**

**The estimated cost to the Government is \$176,000.** This figure is calculated by multiplying the estimated number of respondents 8,800 x .5 hour (30 minutes) (time required to collect and process information) x \$40 (Suggested average hourly rate based on GS-7 median hourly pay rate of \$19.20 per hour and \$20.80 for clerical, officer, and supervisory time with benefits from the 2016 OPM Federal GS Salary Table. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf)

The government pay rates are not fully loaded for benefits and overhead. The rates are taken directly from the OPM pay scales.

- 15. The following narrative explains the survey: **This is a new collection.**
- 16. CIS Ombudsman does intend to employ the use of statistics or the publication thereof for this collection of information.
- 17. CIS Ombudsman will display the expiration date for OMB approval of this information collection.
- 18. CIS Ombudsman does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods.**

This ICR is a survey employing statistical methods that will be established in the Department of Homeland Security system of records notice titled, "The Ombudsman Customer Satisfaction and Needs Assessment Survey System of Records" as detailed in Section 9 of this statement.