

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
Iraqi Citizens and Nationals Employed by U.S. Federal Contractors
Grantees and Cooperative Agreement Partners
OMB Number 1405- 0184
DS-7655**

A. JUSTIFICATION

1. The Refugee Crisis in Iraq Act of 2007 was included in the National Defense Authorization Act of 2008 which became Public Law 110-181 on 28 January 2008. Section 1248(c) of this Act requires the Secretary of State to request from each Department of State prime contractor or grantee that has performed work in Iraq since March 20, 2003, under a contract, grant, or cooperative agreement with the Department that is valued in excess of \$25,000, information that can be used to verify the employment of Iraqi nationals by such contractor or grantee. To the extent data is available this information must include employee name, date(s) of employment, biometric and other data that can be used to verify employment. This information is to be used for the adjudication of refugee, asylum, special immigrant visa, and other immigration claims and applications.
2. The information from this collection will be used to the extent possible by the Department of State's Bureaus of Population, Refugees and Migration and Consular Affairs, as well as the Department of Homeland Security to process and adjudicate refugee, asylum, special immigrant visa, and other immigration claims and applications.
3. The method for the collection of information will be via electronic submission as it is the most efficient and least burdensome method of collection. The format for compiling the information will be the Department of State's eForms application which is currently used by over 36,000 Department users worldwide. Contracting Officers and Grants Officers will distribute by email to the contractors, grantees and cooperative agreement partners under their authority the DS-7655 form file and Cerenade e-Form filler installation instructions. Respondents, using the Cerenade filler, will complete the form and email the form file to their Contracting Officers or Grants Officer.
4. This collection is specifically designed for meeting the requirements of Public Law 110-181, Section 1248(c). The employment verification data to be collected is specific to each federal contractor, grantee and cooperative agreement partner and is not available or duplicated by another source. The information required is available only from federal contractors, grantees and cooperative agreement partners. At this time, there is no alternate source available.
5. The impact to small businesses or other small entities will be minimal as the method for the collection of information will be via electronic submission.
6. Failure to collect the required information from contractors, grantees and cooperative agreement partners may affect the ability of the Department of State's Bureaus of Population,

Refugees and Migration and Consular Affairs and the Department of Homeland Security to efficiently process the applications of certain Iraqi citizens and nationals seeking refugee status, and Iraqi citizens and nationals seeking special immigrant visas, or other immigration claims. The frequency for collecting information under this requirement is the minimum necessary to ensure that the Department of State meets the requirements set forth under the Act mandating this collection.

7. There are no special circumstances for this collection of information.
8. The Department of State published a 60-day notice in the *Federal Register* (80 FR 43830), and received no relevant public comments. The Department will publish a 30 day notice in the *Federal Register* and solicit public comment regarding this information collection.
9. No payment or gift of any kind will be provided to respondents.
10. The Department of State will maintain all employment verification data from this collection in accordance with relevant law, including Section 222(f) of the Immigration and Nationality Act, where applicable.
11. The information collection does not include questions of a sensitive nature.
12. Respondents: 50 Department of State contractors, grantees and cooperative agreement partners

Number of Responses: 200

Burden Hours per Response: 30 minutes

Hour Burden for Collection: 200 responses x 30 minutes = 100 hours

The approximate number of responses is based on 2008 -2009 historical data derived from the Department of Defense's Synchronized Predeployment and Operational Tracker system. The number of responses is an estimate. The accuracy of the number of Iraqis, currently or formerly employed under a Department of State contract, grant or cooperative agreement, is uncertain due the security issues associated with collecting personal information of Iraqis supporting the Department of State's efforts in Iraq.

Each response is estimated to take 30 minutes to complete, including research, filling out the form and submission. This results in a total estimated annual burden of 100 hours for the information collection.

Responses will be drafted and compiled by Department of State contractors, grantees and cooperative agreement partners and will be carried out as part of their customary and usual business practices and, therefore, imposes a minimal burden on respondents.

Based on a median wage of \$17.30 per hour for administrative service professionals (per the Bureau of Labor Statistics) x 1.4 weighted wage multiplier x 100 hours annually, the total annualized hour burden cost to respondents is \$2,422.

13. There are no capital, start-up, operation, maintenance, or other similar costs to the respondents associated with this collection. The estimated annualized cost to respondents is \$0.

14. Number of Responses: 200

Time to review response: 8.1 minutes

Total time to review collection: 200 responses x 8.1 minutes = 27 hours

Based on a GS-11 working 27 hours to review applications, the annualized costs to the Federal Government is \$675 (27 hours x \$25/hour). The submitted forms are filed electronically in case of future need to verify and to serve as a back-up contingency to our current employment verification process.

15. The Privacy Act Statement has been updated to include the SORN covering this collection and add a Disclosures section indicating the collection is voluntary.
16. No information from this collection will be published.
17. The expiration date for OMB approval of the information collection will be displayed.
18. There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.