

**SUPPORTING STATEMENT FOR
Request for the Return of Original Documents
OMB Control No.: 1615-0100
COLLECTION INSTRUMENT(S): G-884**

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 authority for requesting the information on this form is contained in section 103 of the Immigration and Nationality Act (INA) and 8 CFR 103.2(b)(4) and (b)(5). U.S. Citizenship and Immigration Services (USCIS) developed this form to standardize its procedures for accepting requests for the return of original documents contained in Alien Files. This form will allow USCIS to authenticate the return of original documents contained in Alien Files to their rightful recipients. Parties requesting the return of an original document(s) are required to prove entitlement to the documents by furnishing the supporting documentation that establishes a relationship between themselves and the original documentation contained in the Alien File. Supporting documentation may consist of a Permanent Resident Card, baptismal certificate, birth certificate, driver's license, marriage certificate, naturalization certificate, or U.S. or foreign passport. When an individual requests an original document that is not contained in his or her Alien File, the requester must provide evidence that he or she is the parent or guardian of the subject, the executor of the subject's estate, or has been granted power of attorney for matters pertaining to the individual.

- 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 information provided by this form will be used by USCIS to determine whether a person is eligible to obtain original document(s) contained in an Alien File. In conjunction with this form, USCIS will notify the requester, if they have not provided the necessary proof of identification to obtain the document(s) requested; what additional proof of identification is required; whether the documents requested have been previously returned to another individual; or whether the document(s) requested do not exist in the subject's Alien File.

- 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 G-884 is available online at: www.uscis.gov/G-884. The form can be downloaded, completed and saved by the respondent electronically. Currently, the form must be submitted via mail due to the requirement that a valid form must include a certification by a Notary, including their seal. This collection of information cannot fully conform with the Government Paperwork Elimination Act requirements.

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 collected is unique to USCIS and is not conducted elsewhere and there is no duplication.

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.

Without the use of this information, USCIS has no way of validating the authenticity of a person's claim of ownership and request of original documents contained in his or her own Alien File. Without the authentication of identity, USCIS would not be able to return original documents submitted in connection with other forms.

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.**

On November 9, 2015, USCIS published a 60-day notice in the Federal Register at 80 FR 69244. USCIS did not receive any public comments in response to the 60-day notice.

On February 2, 2016, USCIS published a 30-day notice in the Federal Register at 81 FR 5477. USCIS has not received any comments to 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 DHS/USCIS-001 - Alien File, Index, and National File

Tracking System of Records June 13, 2011, 76 FR 34233. The privacy impact assessment associated with this information collection is Integrated Digitization Document Management Program, January 5, 2007.

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 person's form 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	Request for Return of Original Documents (G-884)	7,500	1	0.5	3,750	*\$31.79	\$119,213
Total		7,500			3,750		\$119,213

* The above Average Hourly Wage Rate is the May 2014 Bureau of Labor Statistics average

wage for “All Occupations” of \$22.71 times the wage rate benefit multiplier of 1.4 (to account for fringe benefits) equaling \$31.79. 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.

This information collection may impose some out-of-pocket costs on respondents in addition to the time burden for the form’s preparation.

There is the cost for postage to mail the form to USCIS, which is estimated to be **\$3,750**.

In addition, for form preparation, legal services, notaries, translators, and document search and generation, USCIS estimates the average cost of this information collection may vary widely, from as little as \$20 to \$1000 per respondent. USCIS estimates that the average cost for these activities is \$490 and that an average of 25% of the total

respondent population may incur this cost. The total cost to respondents would be generated as follows: [7,500] respondents x 25% of the population = [1,875] respondent multiplied by the average cost per response of \$490 = **\$918,750**.

There is no fee associated with this collection of information.

Cost to Respondents

Postage	\$3,750
Document	
<u>Preparation</u>	<u>\$918,750</u>
Total	\$922,500

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	\$ 1,350
b. Collection and Processing Cost	\$150,000
c. Total Cost to Government	\$151,350

Government Cost

The estimated cost to the Government is \$151,350. This figure is calculated by multiplying the estimated number of respondents 7,500 x (1) frequency of response x (0.50 hours) 30 minutes per response x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits), plus the estimated overhead cost for printing, stocking, and distributing the form, which is \$1,350.

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
Request for				0	0	0

Return of Original Documents (G- 884)					
Total(s)				0	0

There has been no increase or decrease in the annual burden hours previously reported for this information collection. There are no changes to the data being collected.

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Request for Return of Original Documents (G-884)				\$0	\$922,500	\$922,500
Total(s)				\$0	\$922,500	\$922,500

There is an increase of **\$922,500** in the estimated public cost burden associated with this information collection. There is the cost for form preparation, legal services, notaries, translators, and document search and generation. In addition, this change is a result of accounting for the estimated cost for postage for submitting applications. There are no changes to the data being collected.

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.