**SUPPORTING STATEMENT FOR**
**Application to File Declaration of Intention**
**OMB Control No.: 1615-0078**
**COLLECTION INSTRUMENT(S): Form N-300**

## 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.**

Under section 334 of the Immigration and Nationality Act (Act), an applicant for naturalization who is residing in the United States as a lawful permanent resident, may file a declaration of intention with U.S. Citizenship and Immigration Services (USCIS) to become a United States citizen.

**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 Form N-300 is used by permanent residents to file a Declaration of Intention to become a United States citizen ("Declaration of Intention"). Although the Declaration of Intention is not required for naturalization, some permanent residents find it necessary to file Form N-300 to fulfill requirements of states that mandate specific documentation from resident aliens seeking to work in certain occupations or professions, or to obtain various licenses. The Form N-300 facilitates this process.

**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 form provides the most efficient means for collecting and processing the required data. Currently, USCIS does not have the automated capability in place to accept electronic submission of this type of application. However, this form can be completed electronically and has been designated for e-filing under the Business Transformation initiative.

**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.**

A review of the Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available that can be used for this purpose.

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 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.**

   The collection of this information is mandated by section 334 of the Act. USCIS collects this information to verify the status of the permanent resident. If USCIS deems the applicant eligible, it will issue him or her a duplicate copy of the Declaration of Intention. Without such documentation, it may not be possible for some permanent residents to satisfy requirements of states that ask permanent residents to produce evidence of their intention to become U.S. citizens in order to engage in certain occupations or professions, or obtain various licenses.

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 May 4th, 2016 USCIS published a Notice of Proposed Rulemaking at 81 FR 26904. USCIS did receive comments after publishing that notice and the responses are contained in the final rule. On October 24, 2016, USCIS published a Final Rule in the Federal Register at 81 FR 73292.

**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. Although, the Privacy Act of 1974 (Public Law 93-589) mandates that personal information solicited from individuals completing Federal records and forms shall be kept confidential, the respondent is informed prior to submission that we may provide this information to other government agencies.

The system of record associated with this information collection is DHS/USCIS/ICE/CBP-001- Alien File, Index, and National File Tracking System of Records which published on November 21, 2013, 78 FR 69864 and DHS/USCIS-007- Benefits Information System, which published on September 29, 2008, at 73 FR 56596.

The related privacy impact assessment is DHS/USCIS/PIA-003(a)- Integrated Digitization Document Management Program (IDDMP), September 24,2013 and DHS/USCIS/PIA-016- Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3), September 5, 2008.

**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 |
|---|---|---|---|---|---|---|---|
| Individuals or Households | Application to File Declaration of Intention/ N-300 | 45 | 1 | 1.33 | 60 | $31.79 | $1,907.40 |
| **Total** | | **45** | | | **60** | | **$1,907.40** |

* *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 benefits provided) equaling $31.79. The selection of "All Occupations" 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.**

There is no capital, start-up, operational or maintenance cost associated with this collection of information. There is a fee cost to respondents of $270 per submission. Fee associated with submission (45 respondents x $250) = $12,150 (See response to Question 14.)

In addition, USCIS estimates that respondents will incur an estimated cost of $3.75 average postage cost to each respondent to submit the completed package to USCIS. Postage to mail completed package (45 x $3.75 average postage) = $168.75_

This information collection may impose some additional out-of-pocket costs on respondents in addition to the time burden for the form's preparation. Many respondents may incur expenses to obtain, medical, military, education, or religious records. For form preparation, legal services, 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 5% of the total respondent population may incur this cost. The total cost to respondents for these services would be approximately $1,102.50.

As a result, the estimated total cost to respondents is approximately $1,271.25.

**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.**

**<u>Annualized Cost Analysis:</u>**

| | | |
|---|---|---|
| Printing Cost | $ | 120 |
| Collecting and Processing | $ | 12,030 |
| Total Cost to Program | $ | 12,150 |

| | | |
|---|---|---|
| Fee Charge | $ | 12,150 |
| Total Cost to Government | $ | 12,150 |

**Government Cost**
The cost of the program to the Government is calculated by multiplying the estimated number of respondents 45 x $270 the suggested fee charge (which includes the suggested average hourly rate for clerical, officer, and managerial time with benefits). In addition, the cost includes estimated overhead cost for printing, stocking, distributing and processing of this form.

**Public Cost**

**The estimated annual public fee cost is $12,150.** This is based on the number of respondents 45 x $270 fee charge.

**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 |
|---|---|---|---|---|---|---|
| N-300 | | | | 60 | 60 | 0 |
| | | | | | | |
| **Total(s)** | | | | **60** | **60** | **0** |

There has been no change in the estimated annual burden hours previously reported for this information collection.

| Data collection Activity/Instru-ment | Program Change (cost currently on OMB Inventory) | Program Change (New) | Difference | Adjustment (cost currently on OMB Inventory) | Adjustment (New) | Difference |
|---|---|---|---|---|---|---|
| N-300 | | | | $1,271 | $1,271 | 0 |
| | | | | | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Total(s)** | | | | **$1,271** | **$1,271** | **0** |

There is been no change in the estimated total annual cost burden associated with this information collection.  There has been an increase in the filing fee.

**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.