

**Supporting Statement for Petition to Classify Orphan as an Immediate Relative;
Application for Advance Processing of an Orphan Petition;
Supplement 1, Listing of an Adult Member of the Household;
OMB Control No.: 1615-0028
COLLECTION INSTRUMENT(S): Forms I-600; I-600A and Supplement 1.**

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.**

Section 204(a)(1)(A)(i) of the Immigration and Nationality Act (INA) permits a U.S. citizen to file a petition to classify the citizen's "child" as eligible to apply for an immigrant visa as an "immediate relative," under section 201(b) of the INA in order to come to the United States for admission as a permanent resident. One of the ways a foreign national (who is unmarried and under the age of 21) can qualify as the "child" of a citizen is if the foreign national is an "orphan," as defined by section 101(b)(1)(F) of the INA who either has been adopted by the citizen, or is coming to the United States to be adopted by the citizen. U.S. Citizenship and Immigration Services (USCIS) must, under section 204(b) of the INA, investigate every immigrant visa petition to determine whether the beneficiary qualifies for the immigrant visa classification that is sought. For an "orphan" case, USCIS may approve the petition only if USCIS is satisfied that the orphan will receive proper parental care. Section 204(d) of the INA requires the submission of an adoption home study in every orphan petition case.

USCIS has designated Form I-600 as the immigrant visa petition that a U.S. citizen files to obtain a formal USCIS adjudication of whether a child beneficiary, whom the citizen has adopted or intends to adopt, is an eligible orphan as defined by section 101(b)(1)(F) of the INA and deemed to be an "immediate relative" under section 201(b) of the INA. The citizen submits with Form I-600 the home study required by section 204(d) of the INA, evidence that the child qualifies as an "orphan," and evidence that the citizen either has adopted the child or will be able to adopt the child in the United States after the child's arrival in the United States. If USCIS approves the Form I-600, the citizen can then apply to a U.S. consulate abroad for issuance of an immigrant visa for the child.

In many cases, the citizen begins the adoption process before a placement agency or other appropriate authority abroad has proposed a specific adoption placement. To facilitate these cases, USCIS designated Form I-600A as an application the citizen can file, with the home study required by section 204(d) of the INA, to obtain a formal decision on the "proper parental care" issue even before there is a specific placement. If the citizen obtains approval of the Form I-600A, then, when the citizen files Form I-600, the "proper care" issue has already been addressed. Thus, absent significant changes in the household or in the number or characteristics of the child or children the citizen intends to adopt, the citizen only needs to present with the Form I-600 evidence that the specific child that has been or will be adopted is an "orphan," and that a valid adoption either has taken place or will take place in the United

States after the citizen has obtained legal custody of the child for emigration and adoption. A citizen is never required to file a Form I-600A. It is always permissible to wait until an adoption placement has been made, and submit all of the evidence together at one time with the Form I-600. Filing the Form I-600A before receiving a specific adoption placement can serve to shorten the time that it can take to adjudicate a Form I-600.

A single filing fee applies, regardless of whether the citizen files just the Form I-600 or files both a Form I-600A and then a Form I-600.

As part of the determination whether an adopted child will receive proper care, 8 C.F.R. 204.3(e) and 204.311 require a home study to address any adult member of the prospective adoptive family's household, in addition to the citizen and his or her spouse. Each adult member of the household must be fingerprinted, interviewed by the home study preparer, and evaluated in the home study. Supplement 1 allows for more efficient collection of necessary information about adult household members so that USCIS can more expeditiously identify these individuals as well as schedule the necessary security checks.

As of July 14, 2014, the Intercountry Adoption Universal Accreditation Act of 2000 (UAA), requires that certain applications and petitions filed with USCIS must meet the requirements of the UAA (subject to certain grandfathering criteria). This requires that applicants and petitioners with cases subject to the UAA provide a home study that has been conducted by an individual or agency authorized under 22 CFR Part 96 to conduct home studies for intercountry adoption cases (see definition of home study preparer in 8 CFR 204.301). All home studies, including home study updates and amendments, must comply with the Hague Adoption Convention home study requirements at 8 CFR 204.311, which differ from the home study requirements under 8 CFR 204.3(e) in effect for orphan cases prior to July 14, 2014.

As noted, section 204(a)(1)(A)(i) of the INA provides for the filing of visa petitions by citizens for their close relatives who wish to immigrate. Section 103(a)(3) of the INA, in turn, authorizes the Secretary of Homeland Security to prescribe forms to be filed to obtain immigration benefits. With respect to the Form I-600A, Form I-600, and Supplement 1, USCIS exercises this authority on the Secretary's behalf by virtue of Department of Homeland Security Delegation Memorandum 150.1 (June 5, 2003).

Any individual may be required to submit biometric information if the regulations or form instructions require such information or if requested in accordance with 8 CFR 103.2(b)(9). DHS may collect and store for present or future use, by electronic or other means, the biometric information submitted by an individual. DHS may use this biometric information to conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws. See 8 CFR 103.16; 8 U.S.C. 1103. Applicants and petitioners providing information through forms I-600A, I-600, and Supplement 1, are required to provide biometrics that include photographs and fingerprints, and in connection with a very small volume of cases (estimated 26 cases), biometrics may include voluntary DNA collection. If the information collected about the beneficiary (child) to determine if the child is eligible as an orphan under section 101(b)(1)(F) of the INA is insufficient to establish that the child is the birth child of his

or her purported birth parent, USCIS may advise the petitioner that he or she may use DNA testing to establish the validity of the claimed genetic parent-child relationship. DNA testing is voluntary and all costs of testing and must be borne by the petitioner.

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.

A U.S. prospective adoptive parent may file Form I-600A in advance of the Form I-600 filing and USCIS will make a determination regarding their prospective adoptive parent's eligibility to file Form I-600A and their suitability and eligibility to properly parent an orphan. USCIS has exclusive jurisdiction over Form I-600A adjudications and collects evidence, such as a USCIS compliant home study, civil documents regarding birth and marriage (if any), as well as identity documentation for each prospective adoptive parent and adult member of the household.

A U.S. adoptive parent may file a petition to classify an orphan as an immediate relative through Form I-600 under section 101(b)(1)(F) of the INA. In this adjudication, USCIS will use the information collected about the child to determine if the child is eligible as an orphan under section 101(b)(1)(F) of the INA.

If a U.S. prospective/adoptive parent has an adult member of his or her household, as defined at 8 CFR 204.301, the prospective/adoptive parent must include the Supplement 1 when filing both Form I-600A and Form I-600. The Supplement 1 must be completed and signed by the adult member of the household. As stated above, Supplement 1 allows for more efficient capture of necessary information about adult household members of the household so that USCIS can expeditiously identify these individuals as well as schedule the necessary security checks.

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 Forms I-600A, I-600 and Supplement 1 provides the most efficient means for collecting and processing the data required for adjudicating these requests. These forms, and their instructions, are located on the USCIS Web site at <http://www.uscis.gov/i-600>, and <http://www.uscis.gov/i-600a>. These forms can be downloaded, completed and saved electronically. The forms, along with the required supporting documentation, must be mailed to the appropriate USCIS office as indicated on the USCIS website. Petitioners who have an approved Form I-600A application may also have the option to file Form I-600 in the child's country of origin, regardless of whether USCIS has a presence in that country or not. USCIS has delegated limited authority to the U.S. Department of State (DOS) to approve Form I-600 petitions on its behalf in such situations.

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 has investigated its internal processes, files and data, as well as those of other Federal agencies that may serve the same population. USCIS was not able to find any other means by which the information necessary for this process could be obtained except for the use of the forms submitted for approval in this request. USCIS will continue to examine ways in which information may be obtained from other sources and any identified duplications can be minimized or removed.

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.**

Small entities might complete and file this type of information collection with USCIS; however, their burden is no different from that of other respondents such as individuals or households who submit this type of request.

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 required to determine eligibility and suitability of U.S. adoptive parents and the eligibility of the orphan(s) they plan to adopt (or have already adopted). Without this information, USCIS would not be able to determine whether a child whom a citizen had adopted or intended to adopt was eligible to immigrate to the United States as an orphan under INA 101(b)(1)(F).

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.**

There are no special circumstances applicable to this information collection. 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 April 26, 2016, USCIS published a 60-day notice in the Federal Register at 81 FR 24625. USCIS received 10 comments from 2 commenters after publishing that notice. A detailed account with USCIS response is available in Supporting Statement Appendix A.

On October 13, 2016, USCIS published a 30-day notice in the Federal Register at 81 FR 70695. USCIS has not yet received comments after publishing that notice.

"U.S. Citizenship and Immigration Services Fee Schedule" (CIS No. 2577-15; DHS Docket No. USCIS-2016-0001) Rulemaking

On May 4, 2016, the Department of Homeland Security published a Notice of Proposed Rulemaking (NPRM) proposing changes to fees collected for processing USCIS benefits. The NPRM contained a section regarding its information collection impacts and requesting comments for 60 days. 81 FR 26904. The comments received are addressed in the final rule that was reviewed by OMB with this supporting statement.

On October 24, 2016, the Department of Homeland Security published a Final Rule that

contains a section regarding its information collection impacts. This rule is effective December 23, 2016. 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 payments or gifts to respondents in exchange for a 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.

Form I-600, Form I-600A, and Form I-600/I-600A Supplement: These Information Collection instruments as designated as a privacy sensitive form with coverage under the following:

- Privacy Impact Assessment (PIA) -- Intercountry Adoptions Process PIA; DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO).
- System of Records Notice (SORN) –
 - o Update to DHS/USCIS-005 Inter-Country Adoptions Security, June 5, 2007, 72 FR 31086.
 - o DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864.

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 from whom the information is requested, and any steps to be taken to obtain their consent.

There are questions of a sensitive nature.

Form I-600:

Part 2, Q9. The beneficiary is an orphan because (Select only one):

__ He or she has no parents due to death or disappearance of, abandonment or desertion by, or separation or loss from both parents.

__ He or she has only one sole or surviving parent who is incapable of providing proper care and who has irrevocably released the child for emigration and adoption in writing.

STATEMENT OF NEED: This question is relevant to assess a child's eligibility as an orphan under INA § 101(b)(1)(F).

Part 2, Q10. If the orphan has only one parent, answer the following:

A. What happened to the other birth or previous parent?

B. Is the remaining parent capable of providing proper care for the orphan? Yes or No

C. Has the remaining parent irrevocably released the orphan for emigration and adoption in writing? Yes or No

STATEMENT OF NEED: This question is relevant to assess a child's eligibility as an orphan under INA § 101(b)(1)(F).

Part 2, Q14. To your knowledge:

A. Does the orphan have any special need, disability, and/or impairment? Yes or No.

B. If you answered "Yes," name or describe the special need, disability, and/or impairment.

STATEMENT OF NEED: Under INA § 204(d), USCIS must be satisfied that the orphan will receive proper parental care. Further, under 8 CFR 204.311, the home study must contain a discussion of the prospective adoptive parent(s) preparation, willingness, and ability to provide proper care for a child with special needs.

Part 2, Q15. Who has legal custody of the child?

STATEMENT OF NEED: This question is necessary in order for USCIS to assess a child's eligibility as an orphan under INA § 101(b)(1)(F).

Supplement 1 (Part 1, Q10), Form I-600A (Part 1, Q22-23), and Form I-600 (Part 1, Q22-23)

STATEMENT OF NEED: This question is necessary in order for USCIS to assess the applicant/petitioner, spouse (if married), and any adult member of the household's duty of disclosure responsibilities under 8 CFR 204.311(d) and 8 CFR 204.309(a).

Form I-600A (Part 4) and Form I-600 (Part 4)

These questions are necessary under Section 504 of the Rehabilitation Act, 29 USC § 794(a) - USCIS ask these questions on disability to gather the necessary information to fully comply with section 504 of the Rehabilitation Act, 29 USC § 794(a).

In addition to the above questions, a home study is required to demonstrate the suitability and eligibility of the prospective adoptive parent(s) to adopt. The home study requires that a home study preparer come to the applicant's home and ask a lot of questions about the applicant's past, as well as about other adult members of the household. The home study preparer looks for problems or weaknesses that may preclude the prospective adoptive parent(s) from adopting a child, so these questions can be sensitive. The home study generally requires:

- A physical, mental, and emotional health assessment and an explanation of whether any health issues will affect his and/or her ability to care for a child.

- An assessment of finances, including a description of income, financial resources, debts, and expenses, which may require submission of paycheck stubs or income tax forms, and a worksheet of bills, mortgage or rent payments, car payments, or other supporting financial documents.
- Disclosure of criminal history and checks of available child abuse registries for all adult members of the household.
- Names, addresses, and phone numbers of three or four references for both prospective adoptive parents.
- A statement from each current child about his or her feelings toward the adoption and the children's interests, hobbies, and grades.

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
Households	Petition to Classify Orphan as Immediate Relative, Form I-600	1,307	1	.75 hours (45 min)	980	\$32.52	\$31,870
Households	Application for Advance Processing of an Orphan Petition, Form I-600A	987	1	.75 hours (45 min)	740	\$32.52	\$24,065
Individuals	Supplement 1, Listing of Adult Member of the Household	467	1	.25 hours (15 min)	117	\$32.52	\$3,805
Households	Home Study	1,147	1.45	25 hours~	41,575	\$32.52	\$1,352,019
Individuals	Biometrics	3,466**	1	1.17 hours	4,055	\$32.52	\$131,869
Households	Biometrics - DNA ¹	13	1	6 hours	78	\$32.52	\$2,537
Total		***2,294			47,545		\$1,546,165

* The above Average Hourly Wage Rate is the [May 2015 Bureau of Labor Statistics](#) average wage for “All Occupations” of \$23.23 times the wage rate benefit multiplier of 1.4 (to account for fringe benefits) equaling \$32.52. The selection of “All Occupations” (for example) was chosen as the expected respondents for this collection could be expected to be from any occupation.

** Form I-600A, Form I-600, and Supplement 1 respondents must provide biometrics (Form I-600 filers, who previously filed Form I-600A and file while within their Form I-600A and fingerprint validity periods do not have

¹ If the information collected about the child to determine if the child is eligible as an orphan under section 101(b)(1)(F) of the INA is insufficient to establish that the child is the birth child of his or her purported birth parent, USCIS may advise the petitioner that he or she may use DNA testing to establish the validity of the claimed genetic parent-child relationship. DNA testing is voluntary and all costs of testing and the petitioner must pay all costs associated. The estimated burden for Form I-600 includes the burden required to provide information about the child to determine if the child is eligible as an orphan. USCIS decided to segregate the burden estimate for these DNA collections because the collection of DNA is an extraordinary step and may increase the burden above the time required for typical Form I-600 adjudications.

to be re-fingerprinted for USCIS purposes).

*** The total of respondents per USCIS Form I-600 and Form I-600A filing projection data. This aggregate does not include Department of State Form I-600 filings. It also does not include the number of Supplement 1 respondents, Biometrics respondents or the Biometrics-DNA respondents.

~ USCIS estimates that it takes, in average, 20-30 hours (25 hours) to obtain a home study for the intercountry adoption process. The estimated time burden can be broken down as follows:

- Training- at least approximately 10 hours.
- Interviewing- 2-10 hours depending on the family and how many people are in the home and how many need to be interviewed.
- Gathering Documentation- approximately 10 hours – Adopting parents will have to gather requisite financial and medical documentation in order for the HSP to be able to assess their suitability and eligibility. This may take families varying amounts of time, depending on their circumstances.

NOTE: The number of respondents subject to a homestudy is an average of the Form I-600 and Form I-600A respondents.

In addition, there is a potential “Ongoing Duty of Disclosure” burden placed on the adopting parents. The burden requires that approximately 45% of home study respondents obtain an updated home study. This burden will vary depending on the family and who is preparing the updated home study.

- 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.**

For informational purposes, the filing fee for Form I-600A is \$775. The filing fee for Form I-600 is \$775 for each petition, unless the children are birth siblings. No fee is required for filing Form I-600 if the petitioner filed Form I-600A and it was approved (or an extension was approved) within the previous 18 months or is still pending and the Form I-600 the petitioner is filing is the first petition he or she has filed based on that Form I-600A (or he or she is filing multiple petitions for birth siblings). A biometrics services fee of \$85 is required for every applicant/petitioner, spouse, and adult member of the household.

There might also be a cost to respondents for responding to this information collection associated with completing the paperwork. USCIS estimates these costs as follows:

1. Postage.

USCIS estimates that respondents will incur an estimated \$10 average postage cost to each respondent to submit the completed Form I-600 and Form I-600A package to USCIS.

USCIS estimates 40% of respondents completing the Form I-600 package will mail the completed package: 1,307 respondents x 40% x \$10 estimated mailing cost = \$5,228.

USCIS estimates that 95% of respondents completing the Form I-600A package will mail the completed package: 987 respondents x 95% x \$10 estimated mailing cost = \$9,377.

Total postage to mail completed packages associated with this information collection is \$5,228 + \$9,377 = **\$14,605.**

2. Translations.

Form I-600 respondents might incur a burden for translations of documents in foreign languages. For respondents to obtain necessary translations, USCIS estimates the cost per respondent of this information collection may vary widely, from as little as \$0 if the family is able to translate their own documents to \$500 or more for a professional service. USCIS estimates that the average cost per respondent is \$250 and that 100% of respondent population may incur this cost. The estimated total cost to respondents would be as follows: 1,307 Form I-600 respondents x \$250 = **\$326,750.**

3. Preparers/Attorneys.

USCIS estimates that approximately 8% of Form I-600 respondents who file these requests hire third parties providing preparation/legal services to assist with completing their forms and/or the intercountry adoption process. USCIS estimates that the average cost per respondent is \$65.51 per hour and that 8% of the respondent population filing *Form I-600 incurs this cost.

USCIS estimates that the average cost for respondents hiring third party assistance to complete the package amounts to **\$5,137**, which results from the following analysis:

8% of 1,307 respondents (Total number of respondents who hire preparers/attorneys)
x .750 hours (Time Burden per request) x \$65.51 ([2015 BLS National Mean Hourly Wage rate](#)).

**NOTE: Petitioners typically only require preparation, attorney, or legal services for unique circumstances and typically only for processing Form I-600.*

4. Primary Adoption Provider.

Respondents filing *Form I-600 will require the services of a primary adoption provider, which includes expenses for travel expenses, application fee, agency fees, program country fees, post-placement expenses, etc. USCIS estimates that range of costs for the provider between \$20,000 and \$60,000, with an average cost of \$40,000. USCIS estimates that 100% of the respondent population filing Form I-600 may incur this cost.

The respondents have chosen to adopt a child. USCIS estimates that the base cost to adopt a child in-country (U.S.) is approximately [\\$25,000 to \\$40,000](#). Because this base cost will be incurred by the respondents regardless of whether or not the respondents are adopting an orphan in-country or adopting an orphan from a non-Hague country, USCIS is only reporting the difference between an in-country adoption and the costs associated with this information collection.

This difference is calculated by subtracting the \$40,000 average cost for a non-Hague country adoption and the \$32,500 average cost for an in-country adoption, and multiplying the difference by 100% of the number of respondents.

The estimated total cost to respondents would be as follows: $\$40,000 - \$32,500 = \$7,500 \times 1,307$ respondents (total number of respondents required to use primary adoption providers) = **\$9,802,500**.

**NOTE: No primary adoption providers are required for the Form I-600A process or for respondents when an exception applies.*

5. Home Study.

Respondents will incur costs as a result of the accreditation requirements imposed by the U.S. Department of State in 22 CFR Part 96. Unless an exception applies, respondents are required by 8 CFR 204.311 to submit a home study conducted and prepared by an individual or agency who is authorized under 22 CFR Part 96 to prepare intercountry adoption home studies (see definition of home study preparer in 8 CFR 204.301).

Costs for home studies conducted by an individual or agency other than a public domestic authority can run anywhere from \$500 to \$3000 and are usually less if the adoption is of a special needs child. USCIS estimates that an average of the respondents filing Form I-600A and Form I-600 will be required to incur the cost of a homestudy or 1,147 respondents. In

addition, USCIS estimates that 45% of these respondents will be required to undergo a follow-up home study as part of the process to update case files or 516 respondents.

USCIS estimates that the average cost per home study is \$1,750.

USCIS estimates that the average cost for respondents hiring third party assistance to complete the package amounts to **\$72,756,250**, which results from the following analysis:

100% of 1,147 respondents (Average of respondents filing Form I-600A and Form I-600) + 45% of 1,147 (516) x \$1,750 (average home study cost per respondent) x 25 hours (Time Burden per request).

NOTE: Generally, the cost of the home study depends on the individual or agency conducting the home study. Public domestic authorities, such as a Department of Social Services, or public foreign authorities do not usually charge, or if they do, they often reimburse the fees if the adoption is successfully finalized.

6. DNA Test.

A very small portion of this collection's population (13 estimated cases for respondents filing Form I-600) might have to incur expenses associated with DNA tests that USCIS may suggest as evidence to establish the beneficiary's eligibility under INA 101(b)(1)(F). USCIS currently estimates that these tests might cost, in average, around \$488, based on the information provided by AABB accredited labs and other DNA pricing information available online. Estimates for respondents subject to DNA tests are calculated as follows: 13 respondents x \$488 = **\$6,344**.

Here are some links that help illustrate these examples: List of AABB accredited labs: <http://www.aabb.org/sa/facilities/Pages/RTestAccrFac.aspx>; samples of fees associated with DNA tests: <http://www.dnacenter.com/paternity/legal-testing.html> - \$500; <http://www.genetictechnologies.com/FAQ.html#q02> - \$300; <http://www.affiliatedgenetics.com/?product=immigration-testing> - \$675; <http://andergene.com/pricing.html> - \$395.

7. Total Annual Cost Burden to Respondents.

USCIS estimates that the total annual cost burden to respondents for this collection is **\$81,604,586**, which is the sum of the following:

1. Postage:	\$	14,605
2. Translations:	\$	326,750
3. Preparers/Attorneys:	\$	5,137
4. Primary Adoption Provider:	\$	9,802,500
5. Homestudy:	\$	72,756,250
6. DNA Test:	\$	6,344

The estimated cost to each respondent of this information collection is: \$82,911,586 / 2,294

total number of respondents = \$36,143.

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: \$946
- b. Collection and Processing Cost: \$2,072,460
- c. **Total Cost to Government (funded by USCIS user fee collections): \$2,073,406**

Government Cost

The estimated cost to the government is **\$2,073,406**, which is funded by USCIS user fee collections, is calculated by multiplying the estimated number of respondents x the fee charge for a collection, in addition to the number of respondents from whom USCIS collects biometrics x \$85 biometric fee. The total cost includes the suggested hourly rate for clerical, officer and managerial time with benefits, plus a percent for the estimated overhead cost for printing, stocking and distributing and processing of this form. The costs are derived as follows:

- Form I-600 respondents (1,307) x fee charge (\$775) = \$1,012,925; plus
- Form I-600A respondents (987) x fee charge (\$775) = \$764,925; plus
- Biometrics Respondents (3,466) x fee charge (\$85) = \$294,610; plus
- Printing cost (\$946).

15. **Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.**

(From Question 12 above)

Information Collection Instrument	Program Change			Adjustment		
	Current OMB-Approved Hours Burden	New Hours Burden	Difference	Current OMB-Approved Burden Hours	New Hours Burden	Difference
Form I-600				1,998.75	980	-1,018.75
Form I-600A				2,682	740	-1,942
Form I-600A Supplement 1				829	117	-712

Homestudy				89,400	41,575	-47,825
Biometrics				15,061.41	4,055	-11,006.41
DNA 1 -- biometrics				156	78	-78
Total(s)				110,127	47,545	-62,582.16

The current hour inventory approved for this form is 110,127 hours, and the requested new total hour burden is 47,545 which is a decrease of 62,582.16 annual burden hours. This change in burden results from the agency's better estimates of the number of respondents and time burden associated with these requests. USCIS continues to disclose the burden estimate associated with the collection of DNA, which is reduced by 78 burden hours.

There is a decrease of 62,582.16 hours in the estimated hour burden associated with this information collection due a decrease in the number of respondents. USCIS has updated this information based on better estimates derived from data collected since the previous information collection request. There is no change in the information being collected.

(From Question 13 above)

Information Collection Instrument	Program Change			Adjustment		
	Current OMB-Approved Burden Cost	New Cost Burden	Difference	*Current OMB-Approved Burden Cost	***New Cost Burden	Difference
Form I-600				\$702,963	\$10,139,615	+\$9,436,652
Form I-600A (postage)				\$0	\$9,377	+\$9,377
Form I-600A/I-600 Home Study				\$6,258,000	\$72,756,250	+ \$66,498,250
DNA 1 -- biometrics				\$12,688	\$6,344	-\$6,344
Total(s)				**\$6,973,662	~\$82,911,586	+ \$75,937,924

* The current OMB-approved Burden Cost Total reflected on the current OMB Inventory was presented as the total \$6,973,662, and did not provide a breakdown of costs. For comparison purposes, in documenting the adjustment for this Extension Action, the cost breakdown is provided using the following analysis:

Form I-600: \$692,900 (translation services at respondents x average cost of \$260 per respondent) + \$10,063 [8% of 2,665 respondents (Total number of petitioners who file forms I-600 who hire preparers/attorneys) X .750 hours (Time Burden per request) X \$62.93 (2014 [BLS National Mean Hourly Wage rate](#))] = \$702,963.

Form I-600A/I-600: \$6,258,000 home study costs

Biometrics – DNA: 26 respondents x average cost \$488 per respondent = \$12,688

TOTAL: \$702,963 Form I-600 cost + \$6,258,000 Form I-600A /I-600 home study costs + \$12,688 DNA costs = **\$6,973,651.**

****** The current OMB-approved Burden Cost Total reflected on the current OMB Inventory was presented as the total \$6,973,662 -- this figure was miscalculated by \$11 and was entered incorrectly to the OMB inventory. The actual total is \$702,963 Form I-600 cost + \$6,258,000 Form I-600A costs + \$12,688 DNA costs = **\$6,973,651.** However, for the purposes of maintaining consistency with the current OMB inventory available for public review, USCIS is providing the figure \$6,973,662 as the total and used this figure in calculating the Program Adjustment .Difference for this Extension Action.

*******USCIS has provided a more comprehensive and accurate cost burden data for this Extension Action. The improvements in data stem from improved more accurate costs collected between 2014 and 2016, as well as includes costs not previously known. For comparison purposes in documenting the adjustment for this Extension Action, the cost breakdown is provided using the following analysis:

Form I-600: \$5,228 (1,307 respondents x 40% x \$10 estimated mailing cost) + \$326,750 (translation services at 1,307 respondents x average cost of \$250 per respondent) + \$5,137 [8% of 1,307 respondents (Total number of petitioners who file forms I-600 who hire preparers/attorneys) X .750 hours (Time Burden per request) X \$65.51 ([2015 BLS National Mean Hourly Wage rate](#))] + \$9,802,500 (Primary Adoption Providers services at 1,307 respondents x difference of \$6,500 between average cost of \$40,000 for a non-Hauge country adoption and the \$32,500 average cost for an in-country U.S. adoption) = \$10,139,615.

Form I-600A (postage): \$9,377 (987 respondents x 95% x \$10 estimated mailing cost)

Form I-600A/I-600: \$72,756,250 home study costs

Biometrics – DNA: 13 respondents x average cost \$488 per respondent = \$6,344

TOTAL: \$10,139,615 Form I-600 cost + \$9,377 Form I-600A postage + \$72,756,250 Form I-600A/I-600 home study costs + \$6,344 DNA costs = **\$82,911,586.**

~New estimated cost burden includes \$14,605 postage, which was not included in the previously approved information collection burden estimates.

The cost burden inventory approved for this form is \$6,973,662, and the requested new total cost burden is \$82,911,586 which is an increase of **\$75,937,924** burden costs. This change in burden results from the agency's better estimates of the number of respondents and cost burden associated with these requests. While there is a decrease in the number of respondents, the increase in cost burden is due to accounting for costs not previously included in previous estimates, such as costs for Primary Adoption Providers and postage. There is no change in the information 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.**

USCIS does not intend to employ the use of statistics or the publication thereof for this information collection.

- 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 of OMB approval for 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.