

**SUPPORTING STATEMENT FOR
Request for Verification of Naturalization
OMB Control No.: 1615-0049
COLLECTION INSTRUMENT(S): N-25**

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 310 of the Immigration and Nationality Act (Act) identifies that the Attorney General is the only authority that can naturalize persons. The Act also provides authority to certain courts to administer the oath of allegiance. There are instances where this administration of the oath is not recorded within the United States Citizenship and Immigration Services (USCIS). To facilitate the gathering of information by USCIS to verify the oath was properly administered in these instances, the agency has developed form N-25 to collect the necessary information.

- 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-25 is necessary to allow U.S. Citizenship and Immigration Services (USCIS) to obtain verification from a court that a person claiming to be a naturalized citizen has, in fact, been naturalized by that court. The form may be used to validate a claim of being naturalized.

- 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.**

This form is not available electronically as it is sent from USCIS to a court when there is reason to believe the person identified on the form has been naturalized at the court where the form is sent. The form is only completed upon a mailed request to the court; USCIS pre-fills certain data elements and then sends a request for the missing data elements to be provided. As USCIS partially completes the form and the data requested from the courts is minimal, and also due to the low volume of the form, USCIS will not be making the form available electronically and requests an exception to the GPEA requirement and respectfully asks for a 3-year approval.

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.**

There is no other collection tool that requests this information from the courts and as such there is no duplication of information collected.

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.**

Some of the courts could be considered representative of a small entity; however USCIS has made every effort to minimize the amount of information necessary to comply with the collection requirements and pre-completes certain information.

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 N-25 is the last resort for USCIS to obtain the necessary information to ensure the oath of allegiance was properly administered. If USCIS cannot make such a determination, it would adversely affect the decision-making process of ensuring the person in question has properly completed all required steps in the naturalization process and could affect their standing as a naturalized citizen.

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 April 27, 2016 USCIS published a 60-day notice in the Federal Register at 81 FR 24865. USCIS did receive 1 comment after publishing that notice. The comment was not specific to the form or instruction and no action was necessary. On November 25, 2016, USCIS published a 30-day notice in the Federal Register at 81 FR 85244. USCIS did/did not receive comments.

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 provided to the respondent. The Privacy Impact Assessment associated with this information collection is the Integrated Digitization Document Management Program (IDDMP) dated September 24, 2013 and the corresponding system of record notice is the Immigration and Customs Enforcement, Customs and Border Protection—001 Alien File, Index, and National File Tracking System of Records which was published in the Federal Register on November 21, 2013 at 79 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 persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The information collected is that which USCIS is allowed to obtain in the determination of if naturalization is indicated for the person in question. USCIS requests the limited data elements to confirm the person who completed the oath of allegiance as part of the naturalization process is the same one that it has previously made a determination as to the appropriateness of such an action.

- 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
State, local or Tribal Governments	N-25 / Request for Verification of Naturalization	1,000	1	.25	250	\$36.05	\$9,013
Total		1,000			250		\$9,013

* The above Average Hourly Wage Rate is derived from the Mean Hourly Wage for "Legal Support workers" as listed in the 2015 Bureau of Labor Statistics report *Occupational Employment Statistics*. The wage rate of \$36.05 is calculated from the base average wage rate of \$25.75 times the wage rate benefit multiplier of 1.4.

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.

The only cost associated with this collection of information is postage to return the form, estimated to be \$500, which represents approximate postage of \$.50 per respondent.

- 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.**

The estimated cost to the Government is \$12,995. This figure is calculated by multiplying the estimated number of respondents 1,000 x .25 hours (15 minutes) per response (time required to process this information) x \$51.98 (hourly wage of GS 12 step 2 employee with benefit multiplier of 1.4). Total cost is 250 hours x \$51.98 = \$12,995.

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

There are no changes to the time burden reported for this collection. There are no changes to the form/instructions.

- 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.