

**SUPPORTING STATEMENT FOR
Document Verification Request and Supplement
OMB Control No.: 1615-0101
COLLECTION INSTRUMENT(S): G-845**

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 121 of the Immigration Reform and Control Act (IRCA), Public Law 99-603, provides authority for U.S. Citizenship and Immigration Services (USCIS) to maintain an automated system for verifying the immigration status of non-citizen applicants of certain types of federally-funded benefits, such as Food Stamps, Temporary Assistance to Needy Families, Unemployment Insurance, Medicaid, Housing Assistance, Education Grants, Loans and Work Study. The IRCA-mandated system must be accessible to federal, state and local benefit-issuing agencies and institutions that administer those federally-funded benefits.

Section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Public Law 104-208, requires USCIS to respond to inquiries by federal, state, and local benefit-issuing agencies and institutions seeking to verify or determine the citizenship or immigration status of any individual within the jurisdiction of the agency for any lawful purpose.

The Real ID Act of 2005, Public Law 109-13 further enhanced the role of the SAVE Program. This Act establishes certain minimum standards for the issuance of state-issued driver's licenses and identification cards in order for those documents to be acceptable for official federal purposes. To meet the requirements of the Real ID Act, states must verify the immigration status of every applicant for a Real ID driver's license and identification card. States must use the Systematic Alien Verification for Entitlements (SAVE) Program to verify the immigration status for non-U.S. citizens. States may also use the SAVE Program to verify certain naturalized or derived citizens.

SAVE's role was further expanded under the Patient Protection and Affordable Care Act of 2010, Public Law 111-148, which provides for a variety of healthcare reforms including health insurance benefits for qualified "aliens lawfully present in the United States." The legislation creates state-based health insurance benefit exchanges through which individuals can purchase coverage, with premium and cost-sharing credits available to low-income individuals and families. The legislation requires the Secretary of Health and Human Services, in consultation with the Department of Homeland Security, the Social Security Administration and the Department of Treasury, to establish

a program for determining an individual's eligibility for enrollment in Affordable Care Act benefits and for certain existing benefits, such as Medicaid, through the exchanges. As part of this eligibility determination, exchanges and health and human services agencies use the SAVE Program to verify the immigration status and naturalized or derived citizenship of certain applicants.

The FAA Extension, Safety and Security Act of 2016, Pub. L. No. 114-190, § 3405(d) (July 15, 2016), directed the Secretary of Homeland Security to authorize Airport Operators to have direct access to SAVE to determine the eligibility of individuals seeking unescorted access to any security identification display area of an airport. USCIS and the Transportation Security Administration coordinated their responsibilities concerning implementation of this requirement.

Based on these authorities, the SAVE Program responds to requests from Federal, state and local government benefit granting agencies and Airport Operators for a wide variety of benefits.

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.

In the verification process, a participating agency validates an applicant's immigration status by inputting identifying information into the Verification Information System (VIS), which executes immigration status queries against a range of data sources. If VIS returns an immigration status and the benefit-issuing agency does not find a material discrepancy with the response and the documents provided by the applicant, the verification process is complete. Then, the agency may use that immigration status information to determine whether to issue the benefit.

If VIS does not locate a record pertaining to the applicant during an electronic initial verification, a second step additional verification must be requested by the agency, so that a Status Verifier can manually check the records. If the Status Verifier cannot determine status during the second step additional verification, they will request the agency to submit a copy of the applicant's immigration document. The immigration document can be submitted using scan and upload or by attaching it to a Form G-845 and mailing it to the Status Verifier.

Applicants may check on the processing of additional verification through the SAVE Case Check web portal, found at <http://www.uscis.gov/save/save-case-check>. SAVE Case Check permits applicants to use the SAVE verification numbers associated with their benefit applications or the immigration identification numbers and dates of birth provided to those benefit granting agencies to access this information.

In limited cases, agencies may query USCIS by filing Form G-845 by mail. Although the Form G-845 does not require it, if needed, certain agencies may also file the Form G-845

Supplement with the Form G-845, along with copies of immigration documents to receive additional information necessary to make their benefit determinations. These forms were developed to facilitate communication between all benefit-granting agencies and USCIS to ensure that basic information required to assess status verification requests is provided.

- 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.**

Currently, USCIS allows for the electronic verification of the immigration status of non-citizen applicants of certain types of federally-funded benefits through VIS. The URL is <https://stage.save.uscis.gov/Web/vislogin.aspx?JS=YES>. However, if the electronic process does not verify the applicant the benefit-issuing agency may have to submit the G-845 by mail to the assigned USCIS verification office by state. SAVE has implemented a process whereby the benefit issuing agency can scan and upload the applicant's immigration documents to submit for additional verification and avoid mailing the documents and the G-845. Scan and upload is the predominant and preferred method of submitting documents.

- 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 USCIS Forms Inventory Report revealed no duplication of efforts. There is no 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 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.**

This information collection allows USCIS to quickly and uniformly respond to benefit-issuing agencies nationwide with a document that can be used as a record of the transaction. This process assists agencies in identifying applicants without immigration status and potentially those using counterfeit documentation, to avoid granting benefits to those ineligible. Additionally, USCIS is provided an opportunity to update its database

when the applicants produce appropriate documents that are not currently reflected in the database.

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.

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 November 24, 2017, USCIS published a 60-day notice in the Federal Register at 82 FR 55852. USCIS received 1 comment submissions after publishing that notice. The commenter expressed privacy concerns for U.S. Citizens who complete and file an Affidavit of Support Under Section 213A of the INA, Form I-864 in sponsoring a foreign national. USCIS has considered these public comments and these comments will not result in any changes to Verification Request Under Section 121, Form G-845.

On February 27, 2018, USCIS published a 30-day notice in the Federal Register at 83 FR 8497. 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 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. The system of record notice associated with this information collection is DHS/USCIS-004 - Systematic Alien Verification for Entitlements Program System of Records, November 8, 2016, 81 FR 78619. The privacy impact assessment for this information collection is DHS/USCIS/PIA-006 - Systematic Alien Verification for Entitlements (SAVE) Program and subsequent updates.

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	# of Respondents	# of Responses per Respondent	# of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State and local governments	VIS Query	8,970,901	1	8,970,901	0.083 (5 mins)	744,585	\$34.84	\$25,941,334
Federal governments	VIS Query	14,323,080	1	14,323,080	0.083 (5 mins)	1,188,816	\$34.84	\$41,418,337
	VIS Query Subtotal	23,293,981		23,293,981		1,933,401		
State and local governments	G-845, Verification Request	47,390	1	47,390	0.083 (5 min)	3,933	\$34.84	\$137,039
Federal governments	G-845, Verification Request	114,716	1	114,716	0.083 (5 min)	9,521	\$34.84	\$331,727
	G-845 Subtotal	162,106		162,106		13,454		
State and local governments	G-845, Verification Request Supplement	2,032	1	2,032	0.083 (5 min)	169	\$34.84	\$5,876
Federal governments	G-845, Verification Request	5,090	1	5,090	0.083 (5 min)	422	\$34.84	\$14,719

	Supplement						
	G-845 Supplement Subtotal	7,122		7,122		591	
Total		23,463,209		23,463,209		1,947,446	\$67,849,032

* The above Average Hourly Wage Rate is the [May 2016 Bureau of Labor Statistics](#) average wage for All Occupations of \$23.86 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$34.84. 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 are no capital or start-up costs associated with this information collection for Form G-845 or Form G-845 Supplement. However, there is a fee of \$0.50 for conducting

queries using the VIS and a fee of \$2.00 for submitting a Form G-845. There is no additional fee for submitting the Form G-845 Supplement.

Respondent cost burden would incur mailing costs for the G-845 and the Supplement. USCIS assumes that the respondent would mail the G-845 and certain agencies may mail the Form G-845 Supplement concurrently with the Form G-845. Therefore, USCIS assumes that the 162,106 G-845 respondents would incur this cost burden. Mailing costs average \$1.26 for first class mail plus delivery confirmation. The cost burden would total \$204,254 (Calculated: 162,106 G-845 x \$1.26 = \$204,253.56).

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

VIS Query:

Collection and Processing Cost: \$11,646,990.50

This figure is calculated by multiplying the estimated number of respondents by the fee, which equals \$11,646,990.50 (Calculation: 23,293,981 x \$0.50 = 11,646,990.50).

Form G-845:

Collection and Processing Cost: \$324,212

This figure is calculated by multiplying the estimated number of respondents by the fee, which equals \$324,212 (Calculation: 162,106 x \$2 = \$324,212).

Form G-845 Supplement:

Collection and Processing Cost: \$142,440

This figure is calculated by multiplying the estimated number of respondents by the average time USCIS requires to collect and process information (.5 hours) by the suggested average hourly rate for clerical, officer, and supervisory time with benefits (\$40), which equals \$142,440 (Calculation: 7,122 x 0.5 hours x \$40 = \$142,440).

Government Cost

The estimated cost of the program to the Government is the sum of the collection and processing costs for each information collection instrument that is part of this IC (see breakdowns under “Annualized Cost Analysis” above). The estimated cost of the program to the Government is \$12,113,642.50.

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
VIS Query				1,055,016	1,933,401	878,385
G-845, Verification Request				21,614	13,454	(8160)
G-845, Verification Request Supplement				427	591	164
Total(s)				1,077,057	1,947,446	870,389

There has been an increase in the estimated annual burden hours associated with this information collection as a result of changes to the number of respondents for each information collection instrument. Although the estimated number of respondents for Form G-845 decreased, the estimated number of respondents for VIS Queries and Form G-845 Supplement increased, resulting in an increase in the overall estimated number of respondents for this information collection. An increase in the number of respondents increases the estimated annual burden hours. No changes were made to any of the information collection instruments.

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
VIS Query				0	0	0
G-845, Verification Request				0	0	0
G-845 Verification Request Supplement				0	0	0
Total(s)				0	0	0

There has been no change the estimated annual cost to respondents associated with this information collection.

- 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.