

**SUPPORTING STATEMENT FOR
Application for Certificate of Citizenship
OMB Control No.: 1615-0057
COLLECTION INSTRUMENT(S): N-600**

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.**

U.S. Citizenship and Immigration Services (USCIS) uses the information collected on the Form N-600 to determine whether the applicant meets citizenship eligibility requirements and conditions. Upon approval of the application the applicant is declared to be a citizen of the United States and USCIS issues a Certificate of Citizenship, pursuant to sections 301, 309, 320, or 321 (repealed) of the Immigration and Nationality Act (INA).

- 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.**

Form N-600 collects information from respondents who are requesting a Certificate of Citizenship because they acquired United States citizenship either by birth abroad to a U.S. citizen parent(s), adoption by a U. S. citizen parent(s), or after meeting eligibility requirements after the naturalization of a foreign born parent. This form is also used by applicants requesting a Certificate of Citizenship because they automatically became a citizen of the United States after meeting eligibility requirements for acquisition of citizenship by foreign-born children. Form N-600 can also be filed by a parent or legal guardian on behalf of a minor child. The form standardizes requests for the benefit, and ensures that basic information required to assess eligibility is provided by applicants.

USCIS uses the information collected on Form N-600 to determine if a Certificate of Citizenship can be issued to the applicant. Citizenship acquisition laws have changed throughout the history of the INA and different laws apply to determine whether the applicant automatically became a U.S. citizen. However, step-children cannot acquire U.S. citizenship under any provision of the INA.

- 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.**

Form N-600 is available for paper filing as a fillable PDF via the USCIS website. The form is also available for electronic filing via the USCIS website. The PDF version can be filled out electronically, but must be printed and mailed to USCIS. The online filing version can be completed, signed, and submitted to USCIS electronically.

- 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.**

Form N-600 collects information unique to the process of applying for a Certificate of Citizenship. The information is required in order for USCIS to make a determination regarding the applicant's eligibility for this benefit. No other USCIS information collection collects this set of data from respondents.

- 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.**

Sections 301, 309, 320, 321 (repealed), and 341 of the INA provide for the issuance of a Certificate of Citizenship to individuals who claim to have acquired U.S. citizenship through birth abroad to a U.S. citizen parent(s), adoption by U.S. citizen parent(s), the naturalization of a parent, the naturalization or citizenship of a spouse, or under special provisions of the law. Form N-600 provides a crucial means of establishing the authenticity of such claims and the absence of this form would impede the processing of such claims for U.S. citizenship. The information collected through this form is essential to documenting whether the applicant has met all of the eligibility requirements to receive a Certificate of Citizenship recognizing his or her U.S. citizenship status. The information is also collected to ensure a complete and accurate adjudication.

- 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 4, 2017, USCIS published a 60-day notice in the Federal Register at 83 FR 19796. USCIS received one comment after publishing that notice. The commenter stated that Part 2., Question 14.c. was confusing and possibly inaccurate as written. USCIS changed the wording of this question in response to the public comment.

On August 15, 2018 USCIS published a second 60-day notice in the Federal Register at 83 FR 40547. USCIS did not receive any comments after publishing the second 60-day notice.

On November 27, 2018, USCIS published a 30-day notice in the Federal Register at 83 FR 60886. USCIS 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.

The System of Record Notices associated with this information collection are:

- DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556, and
- DHS/USCIS-007 - Benefits Information System October 19, 2016 81 FR 72069.

The Privacy Impact Assessments associated with this information collection are:

- DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4),
- DHS/USCIS/PIA-056 USCIS ELIS, and
- DHS/USCIS/PIA-071 myUSCIS Account Experience.

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 some questions regarding marital history of parents that are considered sensitive in nature. However, this information is necessary to make a determination on the applicant's eligibility for citizenship and there is no assurance of confidentiality.

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.

		A	B	C (=AxB)	D	E (=Cx D)	F	(=ExF)
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
Individuals or Households	N-600 Paper File	33,000	1	33,000	1.58	52,140.00	\$35.54	\$1,853,056
Individuals or Households	N-600 E-File	34,000	1	34,000	.75	25,500.00	\$35.54	\$906,270
Individuals or Households	Biometrics	67,000	1	67,000	1.17	78,390.00	\$35.54	\$2,785,981
Total				134,000		156,030.00		\$5,545,306

* The above Average Hourly Wage Rate is the May 2017 Bureau of Labor Statistics average wage for All Occupations of \$24.34 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$35.54. 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 start-up, maintenance, and operating costs associated with this collection of information. For informational purposes, there is a \$1,170 filing fee and an \$85 biometric services fee associated with the filing of this information collection.

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

For form preparation, legal services, translators, 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 approximately 25% of the total respondent population may incur this cost. The estimated cost to respondents generates as follows: 67,000 respondents x 25% of the population = 16,750 multiplied by the average cost per response of \$490 = \$8,207,500.

Respondents who choose to file this information collection on paper will incur a cost for postage to submit the package to USCIS. USCIS estimates that the average cost for postage is \$3.75. The estimated cost for postage for this information collection is \$3.75

multiplied by 33,000 respondents, which equals \$123,750.00.

The total estimated cost to respondents is **\$8,331,250.00**. The estimated average cost per respondent is \$124.35.

- 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.**

USCIS establishes its fees using an activity-based costing model to assign costs to an adjudication based on its relative adjudication burden and use of USCIS resources. Fees are established at an amount that is necessary to recover these assigned costs, plus an amount to recover unassigned overhead (which includes the clerical, officer, and managerial time with benefits and printing costs) and immigration benefits provided for free. As a consequence of USCIS immigration fees being based on resource expenditures related to the benefit in question, USCIS uses the fee associated with an information collection as a reasonable measure of the collection’s costs to USCIS. USCIS has established the fee for Form N-600 at \$1,170. An \$85 biometric services fee is also required from each applicant. The cost to the government is calculated by multiplying the \$1,170 fee times the total number of respondents (67,000), which equals \$78,390,000. The \$85 biometric services fee is also multiplied by the total number of respondents (67,000), for a total of \$5,695,000.00. The total filing fee is added to the total biometric services fee to determine the cost to the Federal government: **\$84,085,000.00**.

- 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-600 Paper File				55,150	52,140	(3,010)
N-600 E-file				39,832	25,500	(14332.00)
Biometrics	0	78,390	78,390			
Total(s)	0	78,390	78,390	94,982	77,640.00	(17,342)

USCIS is reporting changes to the estimated annual hour burden for this collection of

information as a result of changed estimates, as well as a program change. The estimated time burden per response for both instruments was adjusted downward, resulting in a decrease in the total estimated annual hour burden for each instrument. USCIS is also reporting a new estimated annual hour burden as a result of a program change that requires N-600 respondents to provide biometrics when filing this form.

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
N-600 paper				\$7,506,678.00	\$4,166,250.00	\$(3,340,428.00)
N-600 e-file				\$0	\$4,165,000.00	\$4,165,000.00
Biometrics	\$0	\$0	\$0			
Total(s)	\$0	\$0	\$0	\$7,506,678.00	\$8,331,250.00	\$824,572.00

USCIS is updating its cost burden reporting for this collection of information. Previously, the paper and e-filing cost burdens were reported together. USCIS is now breaking the estimated cost to respondents out by instrument. The estimated annual cost burden to respondents has increased due to the increase in the estimated number of respondents for each instrument. There is no estimated cost to respondents as a result of the addition of biometrics to 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.