

**SUPPORTING STATEMENT FOR
USCIS Identity and Credential Access Management (ICAM)
OMB Control No.: 1615-0122
COLLECTION INSTRUMENT(S): No Form**

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.**

The Government Paperwork Elimination Act (GPEA), Public Law 105-277, 44 U.S.C. 3504 (1998) requires federal agencies to use and accept electronic signatures, where practicable, when conducting official business with the public. In addition, Congress passed the E-Government Act of 2002, Public Law 107-347, 44 U.S.C. §§ 101, 3501, 3541, and 3601 notes (2002), to promote the use of the Internet and emerging technologies within and across Government agencies, provide citizen-centric Government information and services, reduce costs and burdens for businesses and other Government entities, promote access to high quality Government information and services across multiple channels, and transform agency operations by utilizing, where appropriate, best practices from public and private sector organizations.

To help meet this goal, United States Citizenship and Immigration Services (USCIS) established a portal for persons interested in interacting electronically with the agency. The portal is called Identity, Credential, and Access Management (ICAM). ICAM creates a unique 2-factor authentication access account to allow a user to interact with various USCIS's electronic systems. These systems may require their own additional information for further interaction and have their own OMB Control Number. Various sections of the Immigration and Nationality Act (INA) provide the authority for USCIS to conduct collections of information, and this also grants the ability for the agency to collect the information necessary to establish the account.

- 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 order to interact with USCIS electronic systems accessible through the USCIS ICAM portal, a first time user must establish an account. The account creation process requires the user to submit a valid email address; create a password; select their preference for receiving a one-time password (via email, mobile phone, or both); select five password reset questions and responses; and indicate the account type they want to set up (customer or legal representative). The account creation and the account login processes both require the user to receive and submit a one-time password. The one-time password can

be provided either as an email to an email address or to a mobile phone via text message. The customer also has the option of receiving a one-time password readable by a two-factor authentication application on a mobile device. If the authentication application option is selected, the customer can either scan a QR code or enter a text code.

USCIS ICAM currently grants access to myUSCIS and the information collections available for e-filing. ICAM is also the portal through which accounts to submit H-1B registrations are created and accessed.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The use of this electronic information collection system provides for compliance with the Acts cited above. To the fullest extent possible when not required by statute or due to limitations of the information required, USCIS will allow for online data entry as well as for electronic submission of supporting documentation.

- 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.**

The information entered within USCIS ICAM is unique to the email account or phone number provided and controlled by the person creating an account. Once the access account is established, the account holder will not need to enter that data again and cannot use that email account or phone number to establish another access account.

- 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.**

Certain businesses and other small entities, such as attorneys' offices, will be required to enter the information to establish a USCIS ICAM account. The information collected is the same as an individual account: unique, controlled email and/or wireless phone number.

- 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 information entered in USCIS ICAM is unique to the account set up process and is necessary to allow members of the public to interact electronically with USCIS.

- 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 December 3, 2018 USCIS published a Notice of Proposed Rulemaking in the Federal Register at 83 FR 62406. USCIS addressed comments received in the Final Rule.

On **XXXXX XX**, 20**XX**, USCIS published a Final Rule in the Federal Register at **XX FR XXXXX**.

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 respondents.

The information collected is covered in the associated published system of record notices:

- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), November 27, 2012, 77 FR 70792, and
- DHS/ALL-037 E-Authentication Records System of Records, August 11, 2014, 79 FR 46857.

The associated Privacy Impact Assessment are:

- DHS/USCIS/PIA-030(e) E-Verify Program,
- DHS/ALL/PIA-014(b) Personal Identity Verification (PIV) Management System, and
- DHS/USCIS/PIA-056 USCIS Electronic Immigration System.

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 within this collection.

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 (=CxD)	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	USCIS ICAM	2,335,000	1	2,335,000	0.167	389,945	\$35.54*	\$13,585,684
Business or other for-profit	USCIS ICAM	478,225	1	478,225	0.167	79,863.58	\$53.58**	\$4,279,090
Total		2,813,225		2,813,225		469,808.58		\$18,137,736

* This 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.

** This Average Hourly Wage Rate is the May 2017 Bureau of Labor Statistics average wage for Business and Financial Operations Occupations of \$36.70 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$53.58.

- 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 costs to the respondents associated with this collection. Any costs are captured within the OMB Controlled collections that can be electronically filed through myUSCIS.

- 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.**

Any costs to the Federal Government are captured within the OMB Controlled collections for which the respondent creates an account in USCIS ICAM.

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
USCIS Identity and Credential Access Management (ICAM)	407,157	469,809	62,652			
Total(s)	407,157	469,809	62,652			

USCIS is reporting an increase in the estimated hour burden for this collection of information. USCIS estimates that more ICAM accounts will be created by respondents interested in accessing the H-1B Registration process, which is only available electronically through the USCIS website. The estimated hour burden increased as a result of the increase in the estimated number of respondents.

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
USCIS Identity and Credentialing Access Management (ICAM)				\$0	\$0	\$0
Total(s)				\$0	\$0	\$0

There has been no change in the estimated cost burden to respondents for this collection of information.

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.