

SUPPORTING STATEMENT FOR
AABB accredited laboratory testing; Rapid DNA prototype Accelerated Nuclear DNA
Equipment (ANDE) by NetBio; Rapid DNA prototype RapidHIT200 by IntegenXOMB
Control No.: 1615-0132
COLLECTION INSTRUMENT(S): Form G-1294 and G-1295

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 103(a) of the Immigration and Nationality Act (INA or Act); 8 U.S.C. §1103(a), provides the general authority for the Secretary of Homeland Security to take actions he deems necessary for carrying out his responsibilities under the Act. The Secretary has delegated his authority to determine the eligibility of overseas applicants for refugee status to U.S. Citizenship and Immigration Services (USCIS). *See, generally*, INA § 207; 8 U.S.C. § 1157 and 8 C.F.R. part 207. Section 207(c)(2) of the INA, 8 U.S.C. 1157(c)(2) requires that the spouse and children of any refugee approved for admission shall also be entitled to refugee status if accompanying, or following to join, the principal refugee, provided they meet all requirements of section 207(c)(2). *See also* 8 C.F.R. § 207.7. These accompanying or “following-to-join” relatives are referred to as “derivatives” of the principal refugee. An individual claimed as a child of the principal refugee must meet the definition of “child” in INA 101(b)(1)(A-E). *See* INA § 207(c)(2)(A); 8 C.F.R. § 207.7(a). The definition covers biological parent-child relationships as well as non-biological adopted and legitimated children. Refugee applicants may apply for themselves, and their accompanying spouse and children on the Form I-590, *Registration for Classification as a Refugee*, if the family intends to travel at or near the same time to the United States, once approved. Form I-590 is approved by OMB and assigned OMB Control number 1615-0068.

The burden of proof is on the principal refugee applicant to demonstrate by a preponderance of the evidence that any claimed derivatives have the required relationship to the principal. *See* 8 C.F.R. § 207.7(e). The evidence provided to demonstrate the claimed relationship must be material, credible, and sufficient to meet the applicant’s burden. Where the evidence submitted is found to be insufficient by USCIS to meet the applicant’s burden to demonstrate the claimed relationship, USCIS will deny refugee status. *See* 8 C.F.R. §103.2(b)(8)(i).

Currently USCIS verifies family relationships through testimony and, where available, through the examination of supporting documentation. *See* 8 C.F.R. § 207.7(e)(cross-referencing to 8 C.F.R. §§ 204.2(a)(1)(i)(B), (a)(1)(iii)(B), (a)(2), (d)(2), and (d)(5) for types of documents that may be submitted as evidence of spousal and parent-child relationships). Applicants may submit primary evidence, such as birth and marriage

certificates, or if reliable primary evidence is unavailable, secondary evidence, such as medical and school records, religious documents, and affidavits that meet specified criteria. The regulations do not provide an exhaustive or exclusive listing of all the types of secondary evidence that an applicant may submit in support of his or her claimed relationships. All evidence submitted is evaluated for authenticity and credibility. *See* 8 C.F.R. 204.2(d)(2)(v).

It is often difficult for refugee applicants to meet their burden to demonstrate their claimed parent-child relationships. Refugee applicants often do not have sufficient documents to support their claimed parent-child relationships. Even where documents are submitted, they are often of a type determined to have a high incidence of fraud in certain countries, which discounts the credibility and probative value of the documents. If applicants are unable to establish a claimed family relationship, USCIS may request additional evidence from the applicants to demonstrate eligibility. *See* 8 C.F.R. § 103.2(b)(8)(ii)-(iii). When other forms of evidence have proven inconclusive, 8 CFR § 204.2(d)(2)(vi) allows USCIS to require Blood Group Antigen testing or, if that is inconclusive, Human Leukocyte Antigen (HLA) blood testing, to establish a biological parent-child relationship for benefit eligibility purposes. The cost of such testing is borne by the individuals seeking the benefit. *See id.* While specifically authorized by the regulation, this type of blood testing is expensive, relatively invasive, and time consuming. Therefore, USCIS does not require such tests for refugee processing.

Applicant-Initiated DNA Testing:

USCIS has determined that DNA test results would be effective and credible evidence to use in support of the adjudication of Form I-590, *Registration for Classification as a Refugee*, specifically where testimony and documentation is determined to be insufficient to prove a claimed biological family relationship that is necessary for an individual, such as a child, to derive refugee status from the principal applicant. Currently, refugee applicants who voluntarily wish to provide DNA evidence may initiate DNA testing through an AABB accredited laboratory.¹ In order for UCSIS to accept DNA test results as conclusive evidence of the required familial relationship, the test must be performed following chain of custody procedures established by the AABB.

DNA testing involving buccal (i.e., cheek) swabs is significantly less invasive than Blood Group Antigen testing. DNA testing also provides more reliable results than Blood Group Antigen testing and HLA blood testing. It is also more accessible to applicants wishing to provide additional evidence to support a claimed derivative relationship. The National Association for DNA Collection and Management's *Standard Methods for the Collection of Biological Specimens for Paternity and Relationship Testing* states in Section 3.1.4:

¹ AABB was previously known as the American Association of Blood Banks but now goes by its former acronym only.

Buccal swabs are a great sample collection medium for four main reasons. First, collecting DNA using a buccal swab is an easy and painless procedure, because no needles are required. This is especially useful when dealing with small children, infants or newborns. Second, they do not require any special refrigeration, whereas whole blood does. Third, unlike whole blood, or blood applied to an FTA card, buccal swabs do not expose a collector to infectious agents such as blood-borne pathogens. Lastly, the DNA obtained from a buccal swab is not affected by individuals who have had a blood transfusion or bone marrow transplant, whereas a blood sample is.

USCIS does not have authority to require DNA testing at this time. However, acceptance of voluntary submission of DNA will allow applicants to support claimed relationships where testimony and other evidence have been found to be insufficient. At this time, USCIS anticipates accepting only voluntary submissions of DNA results.

Rapid DNA Pilot:

The Department of Homeland Security Science and Technology Directorate (S&T) has been working in conjunction with the Department of Defense (DOD) and the Department of Justice (DOJ) to fund the development of cost-effective Rapid DNA equipment to allow non-technical users with appropriate training to analyze the DNA of individuals in a field setting and receive reliable results in about one hour. The Homeland Security Act of 2002, P.L. 107-296, §302(4), *codified as amended at* 6 U.S.C. §182(4) authorizes S&T to conduct “basic and applied research, development, demonstration, testing, and evaluation activities that are relevant to any or all elements of the Department, through both intramural and extramural programs...”, with the exception of human-health related research and development activities. Under the Homeland Security Act, S&T is authorized to collect information, as appropriate, to support research and development related to improving the security of the homeland.

The USCIS Refugee Affairs Division (RAD) is planning to pilot S&T’s Rapid DNA equipment in conjunction with the adjudication of Form I-590, *Registration for Classification as a Refugee*, in overseas urban and camp settings. See Response to Qn. #3 below for a description of the Rapid DNA equipment and collection techniques. In order to test the reliability of the Rapid DNA equipment and results obtained in the field setting, DNA samples will be collected from all pilot participants and also sent to AABB accredited laboratories in the United States. The name, date of birth, sex, race, photo, and the names of all claimed biological relatives who have provided DNA samples will be collected on the lab's chain of custody form and mailed with the buccal swab containing the DNA sample to the AABB accredited laboratory in the United States for traditional DNA testing. Participation in the Rapid DNA pilot is voluntary and failure to volunteer for either Rapid DNA testing or traditional AABB accredited lab testing during the Rapid DNA pilot will not affect the individual’s application for refugee status. The applicant and derivatives can pursue other avenues to prove the relationship. Volunteers who do participate and where the Rapid DNA pilot results fail to show a relationship will

be re-interviewed to resolve, where possible, the inconsistencies between testimony and the DNA test results. USCIS hopes to be able to use Rapid DNA results in refugee adjudications once lab and field test findings indicate that the Rapid DNA machines meet or exceed current AABB accredited laboratory standards. Currently, only the Rapid DNA system RapidHIT200 is a prototype. The ANDE(r) Rapid DNA system is not a prototype.

- 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.**

Applicant-Initiated DNA Testing – Denied Applications and Requests for Review:

USCIS will deny refugee cases where applicants are unable to prove claimed relationships to derivatives by a preponderance of the evidence. Denied refugee applicants may file a Request for Review (RFR) (approved under OMB Control Number 1615-0068, USCIS Form I-590) of the denial with new evidence with USCIS. USCIS will review the RFR to determine whether new evidence or explanations overcome the reasons for the denial.

USCIS proposes to permit a refugee applicant whose application for refugee status was denied on the basis of lack of credibility to establish a claimed biological relationship to a derivative child to submit DNA evidence with the RFR. This will allow individuals who are otherwise unable to prove the claimed relationship to provide potentially credible evidence of the biological relationship.

The DNA test must conform to AABB standards, be performed by an AABB accredited laboratory, and follow AABB chain of custody procedures. USCIS will provide instructions for performance of the test and appropriate procedures. With applicant-initiated DNA testing, the applicant identifies an AABB accredited laboratory in the United States, which then sends the DNA kit to the appropriate U.S. embassy or consulate where the applicant will go to have his or her DNA collected by an appropriately trained individual. The DNA sample will then be transmitted to the AABB laboratory for analysis. The applicant must sign a consent form acknowledging his or her submission to the AABB accredited lab testing and granting USCIS the right to view and use the results. USCIS will only allow DNA evidence for parent-child relationships in refugee cases. DNA results must indicate a 99.5 percent or greater probability of parentage per the industry-accepted standard to be acceptable as proof of a familial relationship. See 9 FAM 42.44 and note 1. Regardless of the DNA results, USCIS will review all evidence submitted with an RFR to determine whether the previous findings that resulted in the denial have all been overcome, warranting admission as a refugee.

Rapid DNA Pilot – All Refugee Applicants:

Participants in the Rapid DNA Pilot must sign two consent forms: a Rapid DNA consent form and an AABB accredited laboratory consent form. The consent forms will indicate the information that is being collected, how the information will be collected, to whom it would be released, and for what purpose. During the course of the Rapid DNA pilot, refugee applicants will be permitted to provide DNA samples for the Rapid DNA equipment prior to their interviews to obtain evidence of the bona-fide parent-child relationships of their derivatives. DNA samples will be collected from refugee applicants in a separate location from where the refugee interview is conducted. Failure or refusal to submit to DNA testing will have no impact on the adjudication of the refugee application. Individuals who are 14 years of age and older who voluntarily choose DNA testing must consent to the Rapid DNA testing program by signing a consent form for the testing and validation phases of the program. Parents who voluntarily choose DNA testing must consent to DNA testing for their children under the age of 14.

Refusal to sign the consent form will constitute refusal to participate in the pilot program. Applicants will not be adversely affected for refusing to consent to the Rapid DNA pilot; however, they may still lack acceptable evidence of the parent-child relationship. Cases for which DNA evidence has been provided will be placed on hold pending the results of the AABB lab testing. If DNA results indicate less than a 99.5 percent probability of parentage, USCIS will present the DNA evidence to the applicant and allow him or her to address the inconsistency. The DNA results, along with the applicant's testimony and other supporting evidence, will be taken into consideration by the interviewing officer and supervisor who will make the final decision on the refugee case.

Validation of Rapid DNA Results:

When an applicant participates in the Rapid DNA pilot, his or her DNA samples will also be tested by an AABB accredited laboratory in the United States. The test results will be sent to USCIS, and USCIS will share the results with S&T which will compare them to the results from the two Rapid DNA machines. See Response to Qn. #3 below for a description of the Rapid DNA equipment. The results of this analysis and feedback from the DNA collectors and USCIS staff will be used to analyze the effectiveness of the equipment in the field.

For case processing, USCIS will review the domestic laboratory DNA test results and will conduct additional investigation or take action as necessary to address inconsistencies in DNA tests, the applicant's testimony, and evidence that was previously 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.**

Applicant Initiated DNA Testing:

The physical collection of refugee applicants' DNA from buccal swabs taken by personnel at the U.S. embassies or consulates will not involve the use of automated, electronic, mechanical, or other technological collection techniques, or other forms of information technology. All DNA test kits ordered from the AABB accredited labs, DNA collected samples, and the final DNA results from the laboratories will be physically sent by mail. The domestic laboratories may apply their own technological methods of analyzing the DNA, but such methods are not part of the actual DNA collection processes.

Rapid DNA Pilot:

The Rapid DNA pilot is designed to test the accuracy, ruggedness, and ease of use of the two portable Rapid DNA machines that have been developed by S&T in a field setting. Both Field testing with the system will help to confirm DHS requirements, which will be incorporated into the final product for mass production. Both systems are designed to integrate and automate the current laboratory processes into a single portable instrument that can be used in the field. Processing of DNA results in the field would reduce chain-of-custody and loss of personally identifiable information (PII) concerns and, if successful, may provide expedited results to USCIS officers.

The Rapid DNA systems analyze DNA samples taken from cheek (buccal) swabs, which are placed into a test tube integrated within a disposable microfluidic biochip. Once a user has logged into the Rapid DNA equipment and a swab containing the pilot participant's DNA sample has been collected, the swab will be placed in a biochip set and inserted into the machine. The systems contain all the reagents, buffers, and other fluids and materials necessary to run the DNA analysis. The biochip is then inserted into an automated, integrated desktop unit. The desktop unit contains and provides the power source required to run the reactions and analysis of the DNA sample and conducts the analysis in less than 90 minutes.

Because the process is largely automated, the systems can be used by non-technical users in the field. Each operator of the Rapid DNA systems will sign in to the equipment with his or her credential and pin. All actions will be recorded for security, training and performance analysis of the system. The systems cannot directly transmit data electronically, although logs may be transferred using an Ironkey USB flash drive.

DNA samples will be marked with participant numbers and also identified with built-in radio-frequency identification (RFID) chips.

The validation phase testing will not use any technological collection techniques or information technology. DNA samples will be collected, shipped, and tested using AABB chain-of-custody standards. Results will be sent to USCIS by mail.

- 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.**

Applicant Initiated DNA Testing:

DNA is a unique form of evidence that provides effective and accurate confirmation of parent-child biological relationships. Voluntary submission of DNA as part of an RFR may provide applicants a means of overcoming negative credibility findings regarding claimed relationships where testimony and documentation is found to be insufficient. No duplication of information already available will occur.

Rapid DNA Pilot:

The Rapid DNA machines are designed to provide DNA results quickly and at lower cost than standard AABB laboratory testing. There is currently no Rapid DNA testing equipment available on the open market. Rapid DNA will allow non-technical users with appropriate training to analyze the DNA of individuals in a field setting and receive reliable results in less than 90 minutes. The pilot program is necessary to allow the durability and reliability of the equipment and the viability of collecting and processing DNA tests in a field setting to be tested. Rapid DNA and traditional AABB testing during the Rapid DNA pilot will take place over two to three weeks to determine the effectiveness and usefulness of the equipment. Data from the field pilot will be used to improve the systems and inform future efforts.

Two Consent Forms:

Each participant in the pilot program must sign two consent forms: a Rapid DNA consent form for the pilot testing program and an AABB accredited laboratory consent form for the validation phase of the program. The forms contain some redundancy and duplication. The Rapid DNA pilot was reviewed by an institutional review board (IRB) as required by the U.S. Department of Health & Human Services, Office for Human Research Protections, because it involves research involving human subjects. The IRB required that, as a condition of its concurrence with the program's ethical assurances, USCIS would use separate consent forms for the pilot and validation phases so participants are aware their DNA will be subjected to two tests and the results of the Rapid DNA tests would not affect the outcome of their case.

- 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.**

There is no 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.

Applicant Initiated DNA Testing:

Applicants whose cases have been denied because of credibility concerns related to claimed family relationships would lose an opportunity to reverse a denial. If refugee applicants' cases are denied, they cannot be resettled in the United States and may have lengthy stays in camps or other negative living circumstances before a durable solution is found for their displacement.

Rapid DNA Pilot:

If the Rapid DNA pilot is not conducted, it cannot be tested in circumstances of anticipated usage. The ability to use DNA testing in a field setting could greatly hasten proof of biological relationships, reduce reliance on doubtful documents, and allow USCIS to assist refugees in gaining admission to the United States and overcoming their vulnerable conditions.

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 November 27, 2018 USCIS published a 60-day notice in the Federal Register at 83 FR 60890. USCIS did not receive any comments after publishing that notice.

On February 15, 2019, USCIS published a 30-day notice in the Federal Register at 84 FR 4522. USCIS did receive one comment. The commenter notified USCIS that the company that own the product used for this information collect has changed the company name from NetBio, Inc. to ANDE Corporation and that the product known in the market as the ANDE(r) RAPID DNA system is no longer considered a prototype. USCIS appreciates this information and has updated the description of this IC appropriately in this supporting statement. USCIS is not able to make these updates to the IC titles at this time, but will do so in the next revision action.

- 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.**

The Rapid DNA information collected is covered under the Rapid DNA System Privacy

Impact Assessment, DHS/S&T/PIA-024 dated February 8, 2013. The use that USCIS makes of the DNA information is covered under the System of Records Notice DHS/USCIS-001 published November 21, 2013 at 78 FR 69864.

Although information contained in applications for refugee status under 8 U.S.C. § 1157 is not explicitly covered by the asylum confidentiality regulation at 8 C.F.R. § 208.6, as a matter of practice and policy, that information is treated for purposes of confidentiality in the same manner as information contained in or pertaining to any asylum application pursuant to 208.6(a). In addition, the Department of State has determined that the confidentiality protections afforded under Section 222(f) of the Act (8 U.S.C. § 1202(f)) apply to applications and supporting evidence for refugee status. As such, these records are considered confidential and may only be used for the administration or enforcement of immigration, nationality, and other laws of the United States. Neither case status updates nor other information regarding specific refugee cases may be released without the written consent of the refugee to anyone other than the applicant himself or herself, except as needed for “the formulation, amendment, administration, or enforcement of immigration, nationality, and other laws of the United States,” which includes the processing of refugee cases.

Applicant Initiated DNA Testing:

Applicants who initiate DNA testing in support of an RFR will be required to complete the AABB accredited laboratory consent form and follow chain-of-custody procedures established by that lab.

Rapid DNA Pilot:

The consent forms will entail no burden other than that necessary to identify the respondent, the date, the respondent's case number, and the nature of the instrument. Both consent forms are being submitted to OMB with this supporting statement. Applicants must sign the consent forms to participate in the pilot. Their information will not be shared.

- 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.**

Applicant Initiated DNA Testing:

This information is not being collected from applicants who initiate DNA testing as part of an RFR. USCIS will review DNA results, along with testimony and other evidence, and make a final determination on the case. Those results may indicate that individuals

who have been considered family members are not related by blood to the principal applicant.

Rapid DNA Pilot:

This information is not being collected as part of the Rapid DNA pilot. If, however, the familial relationship between an alleged parent and child is not sufficiently supported by the AABB accredited lab test results, the applicant may be asked follow-up questions to establish whether there is a previously undisclosed non-biological relationship between the alleged parent and child. Based on the responses to these questions, the interviewing officer will determine whether the parent and claimed child are eligible for refugee status.

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	Total Number of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
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Individuals or households	Applicant Initiated AABB accredited lab DNA Testing / No Form Number	60	1	60	6	360	\$35.54	\$12,794
Individuals or households	Standard DNA Testing / No Form	250	1	250	0.05	13	\$35.54	\$444
Individuals or households	Rapid DNA system / No Form Number	250	1	250	0.05	13	\$35.54	\$444
Individuals or households	DNA Collection Consent Form (Laboratory Test) / G-1294	250	1	250	0.167	42	\$35.54	\$1,484
Individuals or households	DNA Collection Consent Form (Rapid Test) / G-1295	250	1	250	0.167	42	\$35.54	\$1,484
Total				1,060		469		\$16,650

* 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 because respondents to this collection could be expected from any occupation.

Applicant Initiated DNA Testing:

Statistics have not been collected on the estimated number of DNA testing requests made in connection with an RFR of a refugee application denial. USCIS estimates 30 DNA tests per year, with each test conducted between two individuals. Average burden per test is estimated at 12 hours for 2 individuals (6 hours per person) and includes contacting an AABB accredited laboratory, paying for DNA testing, travel to and from the U.S. Embassy, U.S. Embassy security, wait time, DNA sample collection, and any chain of custody documents and consent forms required by the AABB accredited lab the applicant has chosen.

Rapid DNA pilot:

The actual number of respondents for the Rapid DNA pilot will depend on the number of individuals who volunteer to participate in the pilot. USCIS is estimating 250 respondents based on the maximum number of tests that could be completed in a two-week pilot. DNA samples will be collected from participants on the day of their refugee interviews. On this day, the refugee applicant will also be interviewed by a USCIS officer in connection with his or her I-590 application. In addition, fingerprints and photographs will be collected for all individuals age 13 to 79. A USCIS employee will discuss the DNA pilot with the applicant after the fingerprints and photograph have been taken. All applicants are expected to remain at the interview location until their fingerprints have been collected, their interviews have been completed, and the interview notes have been reviewed by a supervisor. Individuals who participate in the DNA pilot will not be required to remain at the interview location any additional time than is currently required of applicants not participating in the pilot. Interpreters are provided by the Resettlement Support Center (RSC), funded by the Department of State, at no cost to the applicants. The interpreters who serve during the mandatory collection of fingerprints for Form I-590 will also be assisting with interpretation for participants in the Rapid DNA pilot.

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.**

Applicant Initiated DNA Testing:

USCIS estimates 30 test results per year will be submitted with an RFR for 60 individuals. Costs per test average \$440 (for one or both parents) and subsequent tests for additional children costing around \$220. Some locations require a small collection fee be paid to the panel physician for time spent collecting the DNA sample. The average collection fee is \$25 per person. Applicant-initiated AABB accredited lab testing submitted with RFRs is estimated to cost \$14,700 (\$440 x 30 tests, plus \$25 per person for collection).

Rapid DNA Pilot:

There will be no cost to the applicant for the collection of Rapid DNA or standard AABB lab DNA testing. The two Rapid DNA systems are currently owned by S&T. No additional equipment will be purchased for the Rapid DNA pilot. Funding for the AABB lab DNA testing has been provided by Customs and Border Patrol (CBP) as explained below in Question 14.

- 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.**

Applicant Initiated DNA Testing:

All costs for applicant-initiated DNA testing submitted in support of an RFR will be borne by the refugee applicant.

Rapid DNA Pilot:

The costs below are based on a 2-week pilot with one week in Bangkok and one week in Mae Sot, Thailand:

USCIS Travel Expenses Estimate:	\$ 5,000
USCIS Salary Expenses Estimate:	\$ 4,200 (1 GS-14 employee)
CBP estimated cost for AABB lab testing:	\$10,000
S&T Estimated Travel Expenses:	\$10,000
S&T Salary Expenses:	\$ 8,324 (1 GS-15/7 employee; 1 contractor)
Total:	\$37,524

No new equipment will be purchased for the Rapid DNA pilot.

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) [new minus current]	Difference
G-1294/ G-1295				468	468	0
Total(s)				468	468	0

There is no change in the estimated annual time burden since this program remains as a pilot program.

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New) [new minus current]	Difference
G-1294/ G-1295				14,700	14,700	0
Total(s)				14,700	14,700	0

There is no change in the estimated annual cost burden since this program remains as a

pilot program.

- 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.