

SUPPORTING STATEMENT FOR
Petition to Classify Orphan as an Immediate Relative;
Application for Advance Processing of an Orphan Petition;
Supplement 1, Listing of an Adult Member of the Household; Supplement 2, Consent to
Disclose Information; Supplement 3, Request for Action on Approved Form I-600A/I-600
OMB Control No.: 1615-0028
COLLECTION INSTRUMENT(S): Forms I-600; I-600A; I-600A/I-600 Supplement 1; and
I-600A/I-600 Supplement 2; I-600A/I-600 Supplement 3

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 204(a)(1)(A)(i) of the Immigration and Nationality Act (INA) permits a U.S. citizen to file a petition to classify his or her “child” as eligible to apply for an immigrant visa as an “immediate relative,” under section 201(b) of the INA, to come to the United States for admission as a permanent resident. One of the ways a foreign national (who is unmarried and under the age of 21) can qualify as the “child” of a U.S. citizen is if the foreign national is an “orphan,” as defined by section 101(b)(1)(F) of the INA, who either has been adopted by the U.S. citizen, or is coming to the United States to be adopted by the U.S. citizen. U.S. Citizenship and Immigration Services (USCIS) must, under section 204(b) of the INA, determine for every immigrant visa petition whether the beneficiary qualifies for the immigrant visa classification that is sought. For an “orphan” case, USCIS may approve the petition only if USCIS is satisfied that the orphan will receive proper parental care (often referred to as “suitability and eligibility”). Section 204(d) of the INA provides that no orphan petition may be approved unless a valid home study has been favorably recommended by an appropriately authorized or licensed agency.

USCIS has designated Form I-600 as the immigrant visa petition that a U.S. citizen files to obtain a formal USCIS adjudication of whether a beneficiary, whom the U.S. citizen has adopted or intends to adopt, meets the definition of a child under section 101(b)(1)(F) of the INA (orphan) and is therefore deemed to be an “immediate relative” under section 201(b) of the INA. The U.S. citizen submits Form I-600 with the home study required by section 204(d) of the INA (unless previously submitted with Form I-600A); evidence that the child qualifies as an “orphan; and evidence that the U.S. citizen either has adopted the child or has obtained legal custody of the child for purposes of emigration and adoption and will be able to adopt the child in the United States after the child’s arrival in the United States. If USCIS approves the Form I-600, the U.S. citizen can then apply to a U.S. consulate abroad for issuance of an immigrant visa for the child.

In many cases, the U.S. citizen begins the adoption process with a placement agency or

other appropriate authority abroad that has proposed a specific adoption placement. To facilitate these cases, USCIS designated Form I-600A as an application the U.S. citizen can file to obtain a formal decision on the U.S. citizen's suitability and eligibility to meet the "proper care" requirement even before there is a specific child placed with the U.S. citizen for adoption. A home study is also required by section 204(d) of the INA and must be filed within one year of the filing date of the Form I-600A. If USCIS approves the Form I-600A, then the "proper care" requirement has already been assessed when the U.S. citizen files Form I-600. Absent significant changes in the household or in the number or characteristics of the child or children the U.S. citizen intends to adopt, when the U.S. citizen files Form I-600, he or she only needs to present evidence that the specific child that has been or will be adopted meets the definition of child under INA 101(b)(1)(F) (i.e., is an "orphan") and that a valid adoption either has taken place or will take place in the United States after the citizen has obtained legal custody of the child abroad for emigration and adoption in the United States.

A U.S. citizen is never required to file a Form I-600A. It is always permissible to wait until an adoption placement has been made and submit all of the evidence for a decision on the "proper care" requirement and the beneficiary's eligibility together at one time with the Form I-600. Filing the Form I-600A before receiving a specific adoption placement may shorten the time that it can take to adjudicate a Form I-600.

A single filing fee applies, regardless of whether the U.S. citizen files only a Form I-600, or files both a Form I-600A and then a Form I-600.

As part of the determination of whether a child will receive proper care if admitted to the United States, 8 C.F.R. 204.3(e) and 204.311 require a home study to address any adult member of the prospective adoptive family's household, in addition to the U.S. citizen and his or her spouse (if married). Each adult member of the household must be fingerprinted, interviewed by the home study preparer, and evaluated in the home study. Form I-600A/I-600 Supplement 1 allows for more efficient collection of necessary information about adult household members so that USCIS can expeditiously identify these individuals and schedule the necessary security checks.

As of July 14, 2014, the Intercountry Adoption Universal Accreditation Act of 2012 (UAA), requires that certain Form I-600 applications and Form I-600 petitions meet the requirements of the UAA (subject to certain grandfathering criteria). Applicants and petitioners with cases subject to the UAA must provide a home study that has been conducted by an individual or agency authorized under 22 CFR Part 96 to conduct home studies for intercountry adoption cases (see definition of home study preparer in 8 CFR 204.301). All home studies, including home study updates and amendments, must comply with the home study requirements at 8 CFR 204.311, which differ from the home study requirements under 8 CFR 204.3(e) in effect for orphan cases prior to July 14, 2014.

As noted, section 204(a)(1)(A)(i) of the INA provides for the filing of visa petitions by

U.S. citizens for their close relatives who wish to immigrate. Section 103(a)(3) of the INA, in turn, authorizes the Secretary of Homeland Security to prescribe forms to be filed to obtain immigration benefits. With respect to the Form I-600A, Form I-600, Form I-600A/I-600 Supplement 1, Form I-600A/I-600 Supplement 2, and I-600A/I-600 Supplement 3, USCIS exercises this authority on the Secretary's behalf by virtue of Department of Homeland Security Delegation Memorandum 150.1 (June 5, 2003).

Any individual may be required to submit biometric information if the regulations or form instructions require such information or if requested in accordance with 8 CFR 103.2(b)(9). DHS may collect and store for present or future use, by electronic or other means, the biometric information submitted by an individual. DHS may use this biometric information to conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws. See 8 CFR 103.16; 8 U.S.C. 1103. Applicants and petitioners providing information through Forms I-600A, I-600, I-600A/I-600 Supplement 1, and I-600A/I-600 Supplement 3, are required to provide biometrics. Petitioners who file Form I-600 after Form I-600A generally do not need to submit biometrics again if Form I-600 is filed during the validity period for their approved Form I-600A and previous background checks.

In connection with a very small number of cases, biometrics may include voluntary DNA testing. When a birth parent is giving up a child for adoption as an orphan, other forms of evidence submitted with the petition or application may be insufficient to establish that the child is the birth child of the purported birth parent. In such cases, USCIS may advise the petitioner that DNA testing may be used to establish the validity of the claimed genetic parent-child relationship. DNA testing is voluntary and all costs of testing are incurred by the petitioner.

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.

A U.S. citizen prospective adoptive parent may file Form I-600A in advance of the Form I-600 filing and USCIS will make a determination regarding the prospective adoptive parent's eligibility to file Form I-600A and his or her suitability and eligibility to properly parent an orphan. USCIS has exclusive jurisdiction over Form I-600A adjudications and collects evidence, such as a USCIS-compliant home study, civil documents regarding birth and marriage (if any), as well as identity documentation for each prospective adoptive parent and adult member of the household.

A U.S. citizen prospective/adoptive parent may file a petition to classify an orphan as an immediate relative under section 201(b)(2)(A) of the INA through Form I-600. In this adjudication, USCIS will use the information collected about the child to determine if the child is eligible as an orphan under section 101(b)(1)(F) of the INA.

If a U.S. citizen prospective/adoptive parent's household includes other adult members, as defined at 8 CFR 204.301, the prospective/adoptive parent must include Form I-600A/I-600 Supplement 1 when filing both Form I-600A and Form I-600. Form I-600A/I-600 Supplement 1 must be completed and signed by each adult member of the household. As stated above, Form I-600A/I-600 Supplement 1 allows for more efficient capture of necessary information about adult members of the household so that USCIS can expeditiously identify these individuals as well as schedule the necessary security checks.

A Form I-600A/I-600 Supplement 2, Consent to Disclose Information, is an optional form that a U.S. citizen prospective/adoptive parent may file to authorize USCIS to disclose case-related information that would otherwise be protected under the Privacy Act, 5 U.S.C. 552a, to adoption service providers or other individuals. Form I-600A/I-600 authorized disclosures will assist USCIS in the adjudication of Forms I-600A and I-600.

In addition, USCIS has created a new Form I-600A/I-600 Supplement 3, Request for Action on Approved Form I-600A/I-600, for this information collection. Form I-600A/I-600 Supplement 3 is a form that prospective/adoptive parents must use if they need to request action such as an extended or updated suitability determination based upon a significant change in their circumstances or change in the number or characteristics of the children they intend to adopt, a change in their intended country of adoption, or a request for a duplicate notice of their approved Form I-600A suitability determination. Form I-600A/I-600 Supplement 3 provides a uniform and efficient method to facilitate this process for applicants and petitioners while capturing necessary fees and updates for USCIS adjudicators.

- 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.**

Forms I-600A, I-600, Form I-600A/I-600 Supplement 1, Form I-600A/I-600 Supplement 2, and Form I-600A/I-600 Supplement 3, provide the most efficient means for collecting and processing the data required for adjudicating these requests. These forms and their instructions are located on the USCIS website at <http://www.uscis.gov/i-600> and <http://www.uscis.gov/i-600a>. These forms can be downloaded, completed and saved electronically. The forms must be printed, signed and mailed, along with the required supporting documentation, to the appropriate USCIS lockbox, as indicated on the USCIS website. Petitioners who have an approved Form I-600A application may also have the option to file Form I-600 in the child's country of origin, regardless of whether USCIS has a presence in that country or not. USCIS has delegated limited authority to the U.S. Department of State (DOS) to approve Form I-600 petitions on its behalf in such

situations.

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.**

USCIS has investigated its internal processes, files and data, as well as those of other Federal agencies that may serve the same population. USCIS was not able to find any other means by which the information necessary for this process could be obtained except for the use of the forms submitted for approval in this request. USCIS will continue to examine ways in which information may be obtained from other sources and any identified duplications can be minimized or removed.

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.**

Small entities might complete this information collection, but it is always filed by an individual U.S. citizen and spouse (if any). The burden for small entities completing the information collection is no different from that of other respondents who submit this type of request.

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 collection of this information is required to determine suitability and eligibility of U.S. adoptive parents and the eligibility of the orphan(s) they plan to adopt (or have already adopted). Without this information, USCIS would not be able to determine whether a child whom a U.S. citizen has adopted or intends to adopt is eligible to immigrate to the United States as an orphan under INA 101(b)(1)(F).

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 14, 2019, USCIS published a Notice of Proposed Rulemaking in the Federal Register at 84 FR 62280.

- 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 systems of records notices associated with this information collection are:

- DHS/USCIS-005 Inter-Country Adoptions Security, November 8, 2016, 81 FR 78614, and
- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556.

The privacy impact assessment associated with this information collection are:

- DHS/USCIS/PIA-007(b) Domestically Filed Intercountry Adoptions Applications and Petitions, and
- DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO).

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.

This collection of information asks questions of a sensitive nature.

Questions about how the child became an orphan, what happened to the orphan's prior legal parents, and who has legal custody of the child are relevant to the assessment of a child's eligibility as an orphan under INA 101(b)(1)(F).

Questions about whether the orphan has any special needs, disabilities, or impairments are relevant to INA 204(d) and 101(b)(1)(F), which requires that USCIS must be satisfied that the orphan will receive proper parental care. Under 8 CFR 204.311, the home study conducted in association with this collection of information must contain a discussion of the prospective adoptive parent(s)' preparation, willingness, and ability to provide proper care for a child with special needs, if seeking to adopt a child with special needs.

Questions pertaining to the duty of disclosure are necessary in order for USCIS to assess the applicant/petitioner, spouse (if married), and any adult member of the household's duty of disclosure responsibilities under 8 CFR 204.311(d) and 8 CFR 204.309(a).

Questions asking about accommodations for individuals with disabilities and/or impairments are necessary for USCIS to gather information necessary to fully comply with section 504 of the Rehabilitation Act, 29 USC § 794(a).

In addition, a home study is required to demonstrate the suitability and eligibility of the prospective adoptive parent(s) to adopt. The home study requires that a home study preparer come to the applicant's home and ask multiple questions about the applicant's past, as well as about other adult members of the household. The home study preparer looks for problems or weaknesses that may preclude the prospective adoptive parent(s) from providing proper care to a foreign-born orphan, so these questions can be sensitive. The home study generally requires:

- A physical, mental, and emotional health assessment and an explanation of whether any health issues will affect his and/or her ability to care for a child.
- An assessment of finances, including a description of income, financial resources, debts, and expenses, which may require submission of paycheck stubs or income tax forms, and a worksheet of bills, mortgage or rent payments, car payments, or other supporting financial documents.
- Disclosure of criminal history and checks of available child abuse registries for the prospective adoptive parent(s) and all adult members of the household.

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 Respons	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
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					e (in hours)			
Individuals or Households	Petition to Classify as Immediate Relative, Form I-600	1,200	1	1,200	1	1,200.00	\$35.54	\$42,644
Individuals or Households	Application for Advance Processing of an Orphan Petition, Form I-600A	2,000	1	2,000	1	2,000.00	\$35.54	\$71,073
Individuals or Households	Form I-600(A) Supplement 1, Listing of Adult Member of the Household	301	1	301	1	301.00	\$35.54	\$10,696
Individuals or Households	Form I-600(A) Supplement 2, Consent to Disclose Information	1,260	1	1,260	0.25	315.00	\$35.54	\$11,194
Individuals or Households	Form I-600(A) Supplement 3, Request for Action on Approved Form I-600A/I-600*	1,286	1	1,286	1	1,286.00	\$35.54	\$45,700

Individuals or Households	Home Study	2,500	1	2,500	25	62,500.00	\$35.54	\$2,221,025
Individuals or Households	Biometrics	2,520	1	2,520	1.17	2,948.40	\$35.54	\$104,776
Individuals or Households	Biometrics – DNA	2	1	2	6	12.00	\$35.54	\$426
Total				11,069		70,562.40		\$2,507,534

* 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. “All Occupations” was chosen because the expected respondents for this collection could 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, the filing fee for Form I-600A is \$810. The filing fee for Form I-600 is \$810 for each petition, unless the children are birth siblings. No fee is required for filing Form I-600 if the petitioner filed Form I-600A and it was approved (or an extension was approved) within the previous fifteen months or is still pending, and the Form I-600 the petitioner is filing is the first petition he or she has filed based on that Form I-600A (or he or she is filing multiple petitions for birth siblings). The filing fee for Supplement 3 is \$405.

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

USCIS estimates that costs associated with this information collection include form preparation, legal services, translators, and document search and generation. USCIS estimates that the average cost for these activities is \$490 and 100% of the total respondent population may incur this cost. For Form I-600 and I-600A respondents, the total estimated cost is 3,200 respondents multiplied by the average cost per response of \$490, which equals **\$1,568,000.00**.

Respondents to this collection of information will also incur costs as a result of the accreditation requirements imposed by the U.S. Department of State in 22 CFR 96. Unless an exception applies, respondents are required by 8 CFR 204.311 to submit a home study conducted and prepared by an individual or agency who is authorized under 22 CFR 96 to prepare intercountry adoption home studies (see definition of home study preparer in 8 CFR 204.301).

USCIS estimates that the average cost per home study is \$1,750. All Form I-600A respondents will incur the cost for a home study (2,000 respondents). Form I-600 respondents who did not submit a Form I-600A will also incur this cost. USCIS estimates that 34 percent of Form I-600 respondents will incur the cost of a home study (1,200 respondents multiplied by 34 percent equals 408 respondents). The total number of respondents estimated to incur the cost of a home study is 2,000 plus 408, which equals 2,408, for an estimated cost of \$4,214,000.00. Of those 2,408 respondents, USCIS estimates that 45 percent will be required to undergo a follow-up home study to update case files (2,408 multiplied by 45 percent equals 1083.6 respondents), for an estimated cost of \$1,896,300. The total estimated home study cost incurred by respondents is \$4,214,000.00 plus \$1,896,300, which equals **\$6,110,300.00**.

A very small number of respondents to this collection of information may incur expenses associated with DNA testing as evidence to establish the beneficiary's

eligibility under INA 101(b)(1)(F). Based on the information provided by AABB accredited labs and other DNA pricing information available online, USCIS currently estimates that the average cost of these tests is \$466. USCIS estimates that 2 respondents will incur this cost. The estimated cost to respondents for DNA testing is 2 respondents multiplied by \$466, which equals **\$932**.

Information about the costs of DNA testing was gathered from the following websites:

- List of AABB accredited labs:
<http://www.aabb.org/sa/facilities/Pages/RTestAccrFac.aspx>;
- Samples of fees associated with DNA tests:
<http://www.dnacenter.com/paternity/legal-testing.html> - \$500
<http://www.affiliatedgenetics.com/?product=immigration-testing> - \$675
<http://www.andergene.com/pricing-payment> - \$395
<https://www.labcorpDNA.com/how-dna-testing-works/legal-vs-at-home-testing> - \$210
<http://legalgenetics.com/maternity/> - \$550.

USCIS estimates that the total annual cost burden to respondents for this collection is:

Out-of-pocket costs:	\$ 1,648,000.00
Home study costs:	\$ 6,110,300.00
DNA testing costs:	\$ 932.00
Total:	\$7,759,232.00

The estimated cost to each respondent of this information collection is \$7,759,232.00 divided by 3,200 respondents, which equals \$2,424.76.

- 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.**

Government Cost

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 immigration benefits provided for free. USCIS immigration fees are based on studies of resource expenditures related to the benefit in question. Therefore, USCIS uses the fee associated with an information collection as a reasonable measure of the collection’s costs to the agency. USCIS has established the fee for Forms I-600 and I-600A at \$810 each, and the cost for Supplement 3 at \$405.

The total estimated cost of the program to the government is calculated by multiplying the estimated number of respondents for each Form by the fee charge. This total includes the suggested average hourly rate for clerical, officer and supervisory time with benefits and the estimated overhead cost for printing, stocking, and distributing this form. The cost to the Federal government for this collection of information derives as follows:

I-600 respondents (1,200) x filing fee (\$810.00) = \$972,000.00
 I-600A respondents (2,000) x filing fee (\$810.00) = \$1,620,000.00
 Supplement 3 respondents (1,500) x (\$405) = \$607,500
Total = \$3,199,500.00

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

USCIS created a new Form I-600A/I-600 Supplement 3, Request for Action on Approved Form I-600A/I-600, for this information collection, and made revisions to Forms I-600, and I-600A.

Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Form I-600				1200.00	1,200	0
Form I-600A				2000.00	2,000	0
Form I-600A/I-600 Supplement 1				301.00	301	0
Form I-600A/I-600 Supplement 2				315.00	315	0
Form I-600A/I-600 Supplement 3	0	1,286	1,286			
Home Study				62500.00	62,500	0
Biometrics				2948.40	2,948	0
Biometrics – DNA				12.00	12	0
Total(s)	0	1,500	1,500	69,276	69,276.40	0

USCIS is reporting an increase in the total estimated hour burden to respondents for this information collection. The program change is the result of the new Form I-600A/I-600 Supplement 3, which has an estimated burden per response of 1 hour. Multiplied by the estimated 1,286 respondents for this instrument, the estimated total time burden is 1,286

hours. The burden estimate per response for the other instruments included in this information collection did not change.

Data collection Activity/ Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Form I-600				\$588,000.00	\$618,000.00	\$30,000.00
Form I-600A				\$980,000.00	\$1,030,000.00	\$50,000.00
Form I-600A/I-600 Supplement 1				\$0	\$0	\$0
Form I-600A/I-600 Supplement 2				\$0	\$0	\$0
Form I-600A/I-600 Supplement 3	\$0	\$0	\$0			
Home Study				\$6,110,300.00	\$6,110,300.00	\$0
Biometrics				\$0	\$0	\$0
Biometrics – DNA				\$932.00	\$932.00	\$0
Total(s)				\$7,679,232.00	\$7,759,232.00	\$80,000

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.