

SUPPORTING STATEMENT
Citizenship and Integration Direct Services Grant Program
OMB Control No.: 1615-0140
COLLECTION INSTRUMENT(S): G-1482

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.**

In recent years, USCIS has been authorized to expend funds that are collected for adjudication and naturalization services and deposited into the Immigration Examination Fee Account for the Citizenship and Integration Grant Program (CIGP). *See, e.g.*, Consolidated Appropriations Act, 2016, Title V, sec. 538. USCIS is implementing an assessment of the effectiveness and an ongoing evaluation of citizenship education and naturalization outcomes for grant program participants. To support this assessment, USCIS needs to collect and analyze the responses to a number of data elements as outlined on the attached survey.

USCIS publicly reports the success of grant recipients. The grant recipient survey will provide the information necessary to monitor the grant program including accomplishments, progress meeting goals, progress of the sub-awardee organization (if applicable), identify challenges in meeting goals, staff and/or organizational development activities, student assessment and progress, and promising practices.

- 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.**

The USCIS Office of Citizenship (OoC) will use the information collected during the grant application period to determine the number of, and amounts for, approved grant applications. The goal of the Citizenship and Integration Grant Program is to expand the availability of high quality citizenship preparation services for lawful permanent residents in communities across the nation. Additional activities that support this goal include making citizenship instruction and naturalization application services accessible to low-income and other underserved lawful permanent resident populations; developing, identifying, and sharing promising practices in citizenship preparation; supporting innovative and creative solutions to barriers faced by those seeking naturalization; increasing the use of and access to technology in citizenship preparation programs; working with local libraries, which serve as a vital resource for immigrant communities; and engaging receiving communities in the citizenship and civic integration process.

The USCIS Office of Citizenship will use the data being collected from grant recipients after funding awards have been made to conduct an ongoing evaluation of citizenship education and naturalization outcomes for program participants. Specifically, there will be a comparison with Agency databases to verify A-number accuracy and permanent resident status before an LPR applies for naturalization. In addition, USCIS will analyze and evaluate LPRs' naturalization outcomes. The data made available in public reports provide the following: success of grant recipients in ensuring that students enrolled in citizenship classes under this program achieve educational gains; numbers of individuals provided naturalization application services; numbers of individuals who apply for naturalization and pass the naturalization exam; numbers of individuals who successfully naturalize.

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.

Electronic collection techniques: Grant recipients will submit the data through a web based tool available through <http://www.citizenshipgrant.uscis.dhs.gov/> (final address is still being determined). This proposed Collaboration Tool (which is based on a Salesforce platform), once fully developed and implemented will provide a location for grantees to access a login page to communicate with USCIS and report performance data. The data collection in Salesforce will have some "fat fingers" capability, which will improve the accuracy of the collection.

At present, there is no web-based location for program reporting; the data collection is handled using email and Microsoft Excel. The process requires grantees to submit data regarding citizenship instruction, naturalization application services, and personnel (including classes, class number, hours, pre-post testing, testing scores, date screened, and many other areas) via an Excel form that USCIS staff must review for accuracy and compile in a master quarterly report form.

If implemented, the proposed web-based reporting solution (Collaboration Tool/Salesforce) will increase efficiency and accuracy of data collection and analysis efforts.

Increased Efficiency – The present Microsoft Excel quarterly data review requires cleaning, consolidation, processing and analysis of all OoC Grants Division staff. The process takes approximately one month after each quarter for completion (500-720 hours); it is projected that new information technology process will save approximately 420 – 640 staff hours per quarter.

Improved Accuracy - Data consolidation and validation of the grantee provided information is currently performed manually; the current level of line-by-line, manual data management creates an opportunity of increased human error and, therefore, may comprise integrity of the data. The proposed technological solution's automation process will significantly reduce the possibility of human error and improve data accuracy/integrity.

Saved Resources – It is estimated the proposed technology tool will save roughly \$65,000 to \$80,000 annually.

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 proposed collection instrument would not duplicate any other of information collection. Grant applications are only submitted annually while post award reports grant-use reports are provided quarterly with material unique to that period. There are no other processes in place to gather the data shown in Item 2 above.

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.

The respondents are small organizations working to support individuals engaging in the immigration process with USCIS. At present, the data collection process requires the individuals to fill-in-the-blank for each cell of the excel document listed on the quarterly report document. Despite the information collected being the minimum necessary to award grants and ensure compliance with approved use of funds, it can be time consuming. The proposed technology program will expedite the reporting process for the entities involved. It will decrease time and workload burdens.

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.

USCIS does not directly exercise authority to award grants. The *Memorandum of Agreement between Office of Procurement Operations and United States Citizenship and Immigration Services*, which is renewed each year, sets forth terms by which Office of Procurement Operations (OPO) will provide USCIS acquisition and financial assistance support and oversight on a reimbursable basis for Financial Assistance support services to the USCIS Financial Assistance Program.

Due to this, guidelines stipulate monitoring for all grant services provided using USCIS funding programs. If monitoring grantee funds was not conducted quarterly, USCIS would be unable to provide funding to organizations who offer support services and instruction to those who are impacted by immigration matters before USCIS. The

requirement to submit quarterly reports allow USCIS to verify funds are being used appropriately during the course of the award period, and that activities proposed in the approved grant applications are being carried out. Post-period reviews would not provide sufficient information on programmatic activities during the period of performance, and would not meet the monitoring requirements under MOA guidelines. Utilizing the proposed technological resource, it will be possible to meet the monitoring requirements laid out in the MOA, and to reduce the reporting burden on all involved agencies.

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 19, 2020 USCIS published a 60-day notice in the Federal Register at 85 FR 29957. USCIS received 1 comment after publishing that notice. The commenter suggested that USCIS must 1) allow grant recipients to provide English and civics instruction and naturalization assistance in languages other than English; 2) allow grant recipients to employ teachers who can produce credible evidence of their qualification to teach English as a second language (ESL); 3) eliminate the requirement that grant recipients use the E-Verify system to check all of their employees; and 4) expand the window of time for grant proposal submission. USCIS appreciate this comment's suggestions and provides a response below regarding each topic:

1. Instruction in language other than English: This approach does not help the immigrant integrate, and such instruction requires a lower level of effort that would not be fair to the organizations that do provide instruction in English. Also, USCIS has self-study materials in languages other than English .
2. TESOL certification requirements: Proposed citizenship preparation activities must include the following two components to include the use of citizenship teachers who have at least one year of experience teaching ESL to adults and who: (1) Hold a degree in TESOL; and/or (2) Hold TESOL certification from a state licensing agency; and/or (3) Have a minimum of 2 years of experience in TESOL instruction in a classroom setting for a program that utilizes a textbook and a structured curriculum. However, for future NOFO's due to environmental restrictions (i.e. COVID-19) we plan to expand language to include distance/virtual learning.
3. E-Verify stipulation: E-Verify supports the administration of grants and makes grantees more reliable. It is for Congress to set policy of the use of E-Verify and now standard language in our RAAP and CINAS grants.
4. Short application period: USCIS will take the recommendation into advisement for any future NOFOs and a planning goal is to at least have future announcements posted for at least 30-45 days in Grants.gov.

On January 14, 2021, USCIS published a 30-day notice in the Federal Register at 86 FR

3169. 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.

This collection is covered under the following Privacy Impact Assessment:

- DHS/USCIS/PIA-066 Citizenship and Integration Grant Program

The collection is covered under the following System of Records Notices:

- DHS/USCIS-007 Benefit Information System, October 10, 2019, 84 FR 54622.

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.

USCIS will collect information regarding a person's immigration status. In order to qualify for the program, the grant recipient must verify a person maintains valid immigration status and is a current lawful permanent resident. This is outlined in the notice for funding.

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
Not-for-profit	Grant Application, G-1482	300	1	300	40	12,000	\$51.17	\$614,040
Not-for-profit	Grant Post-Award Evaluation	85	13	1,105	28	30,940	\$51.17	\$1,583,200
Total				1,405		42,940		\$2,197,240

* The above Average Hourly Wage Rate is the [May 2019 Bureau of Labor Statistics](#) average wage for Social and Community Service Manager of \$35.05 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$51.17.

USCIS will also utilize the following Standard Forms to facilitate the collection of information necessary to determine which grant applications to approve:

Form SF-424 – Application for Federal Assistance (OMB Control Number 4040-0004)

Form SF-424A – Budget (OMB Control Number 4040-0006)

Form SF-424B – Assurances – Non-Construction Programs (OMB Control Number 4040-0007)

SF LLL - Certification Regarding Lobbying (OMB Control Number 0348-0046)

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.**

The total estimated capital and start-up cost component (annualized over its expected useful life) associated with this data collection is \$0 dollars per applicant, as organizations would normally have a computer and internet connection necessary to prepare and submit the applications. The total estimate cost per applicant of generating, maintaining, and disclosing or providing the information is \$50, which represents the cost of printing documents and making photocopies. USCIS estimates this cost by multiplying the estimated number of respondents (300) by the estimated cost (\$50), which equals an out of pocket cost of \$15,000.

- 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 estimates that contractor costs associated with the collection, review and decision-making process for grant awarding and post-award follow-up will average \$20,600 a year. USCIS estimates that employee costs equal approximately \$163,702.13 based on an average of 20 percent of yearly work time associated with this collection and also an estimated travel expense of \$9,866. Additional operating expenses for the division charged with overseeing this collection of information for material, postage, and other

related activities is estimated to be \$138,628. The total estimated yearly cost to the government is \$338,601.

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 (in hours)	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New) [new minus current]	Difference
Grant Application, G-1482				12,000	12,000	0
Grant Post-Award Evaluation				30,940	30,940	0
Total(s)				42,940	42,940	0

There is no change in the estimated annual hour burden. There are no program changes.

Data collection Activity/Instrument (in dollars)	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Grant Application, G-1482				6,000	15,000	9,000
Total(s)				6,000	15,000	9,000

The increase in the annual cost burden reflects a correction in the calculation in the prior analysis. There are no program changes.

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.