

**SUPPORTING STATEMENT FOR
IMMVI Veterans Portal
OMB Control No.: 1601-NEW
COLLECTION INSTRUMENT(S):IMMVI Veterans Webform**

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.

On February 2, 2021 President Biden signed **Executive Order 14012** Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans. The role of the White House Domestic Policy Council (DPC) is to convene executive departments and agencies (agencies) to coordinate the formulation and implementation of the Administration's domestic policy objectives. Consistent with that role, the DPC shall coordinate the Federal Government's efforts to welcome and support immigrants, including refugees, and to catalyze State and local integration and inclusion efforts. In furtherance of these goals, the DPC shall convene a Task Force on New Americans, which shall include members of agencies that implement policies that impact immigrant communities.

In response to EO 14012, on July 2, 2021, the Secretaries of Homeland Security and Veterans Affairs announced a new joint initiative, the Immigrant Military Members and Veterans Initiative (IMMVI), to support our Nation's noncitizen service members, veterans, and their immediate family members and directed their departments to identify and prioritize the return of military service members, veterans, and their immediate family members who were unjustly removed from the United States and ensure that they receive the benefits to which they may be entitled.

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 information to be collected for self-disclosure would include: A-Number, USCIS Receipt Numbers (if any), Name, Date of Birth, Country of Residence, Email, Phone Number, Branch and Dates of Military Service, Address, reason for requesting assistance, and Name and Contact Information of Representative, if applicable.

To carry out the goals of IMMVI, DHS is proposing this new data collection to offer noncitizen current and former military members and their families an opportunity to seek assistance from DHS. The purpose of this information collection is to achieve

efficiencies in making contact with individuals, better understand their needs, and track and report the number and types of inquiries received. This information will assist DHS in improving access to immigration services and VA health benefits. DHS plans to collect relevant information to provide assistance at the point the individual submits this information on the new website for benefits and immigration assistance. The information collected through this public facing webform will be voluntarily provided by the users.

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.

A new webform hosted on dhs.gov will be established to allow for individuals to submit the necessary information to make contact with the government to seek assistance. Additionally, the government provides an email address for those who are not able to access the webform. The government will then reach out to the individual to provide them with the necessary information needed to request immigration or VA benefits. The progress of the inquiries will be tracked in a DHS case management system.

The non-citizen current or former servicemember or their family member will submit their information through a webform on dhs.gov. The information will be transmitted to government systems and shared with the cooperating DHS components and agencies assisting the former military members and their families. All information related to the individual's request and action taken by the government will be noted in the case management system for tracking and appropriate follow through and action.

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.

This information is not duplicated for this population in any other place or any other form. Currently there is no uniform way for DHS to receive inquiries from this population. This has caused inconsistent support and public confusion on how to seek assistance.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not

conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Failure to collect this information inhibits coordination within DHS and delays assistance to non-citizen current and former members of the military and their families. Establishing a webform will allow individuals the opportunity to self-identify and seek immigration or VA assistance and improve DHS' ability to assist current and former military members with critical services. Failure to establish this webform will inhibit DHS's ability to comply with the DHS and VA Secretaries commitment to bring back military service members, veterans and their family members who were unjustly removed and to ensure they receive benefits to which they may be entitled. Additionally, failure to collect this information will hinder the VA work with Department of Homeland Security (DHS) ability in identifying veterans who have been formally removed from the United States to ensure they are able to obtain VA benefits to which they may be entitled.

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.

The special circumstances contained in item 7 of the Supporting Statement are not applicable to this information collection.

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.

DHS is seeking this information collection to be approved under the Emergency Process. Following the approval of this Emergency Request, DHS will seek public comment following the normal clearance process, with the publication of a 60 and 30 Day Federal Register Notice. These notices will provide the public the opportunity to provide comments on the information collection request.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no offer of a monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All information received through the DHS website will be reviewed by trained DHS federal staff assigned to IMMVI and stored in a DHS case management system. No information will be shared with other agencies without the appropriate privacy releases from the individuals accessing the portal. All information received through the portal and any actions taken in response to the information collected will be stored in a DHS case management system.

11. Provide additional justification for any questions of a sensitive nature, such as sexual

behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to person's form whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

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

Public Cost

The lack of a clear inquiry procedure for this population is a burden to the public. This portal will reduce costs by creating a clear, one stop, process for non-citizen current and former service members and their families to inquiry about benefits and services that may be available to them.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
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Total	N/A	500	1	1	500	\$27.07*	\$13,535.00

*Wage estimate based on posted wage on U.S. Bureau of Statistics, [May 2020 National Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/occ0520.pdf) The wage rate provided is for All Occupations and is the Mean Hourly wage rate.

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 record keeping, capital, start-up or maintenance costs associated with this information collection. DHS assumes that basic internet access is a customary cost of doing business and will not additionally burden any NGO/IGO assisting individuals in submitting this form.

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.

This proposed inquiry process will improve current internal DHS public inquiry processes Any applications filed as a result of an inquiry received through this procedure will be accepted using current DHS protocols for application collection. The cost of developing the inquiry portal is reflected in the chart below. Responding to inquiries from non-citizen former and current members of the military and their families is already a DHS' responsibility and no additional resources are required to manage this workload. Creating a clear, one stop, process to receive these inquiries will reduce DHS operational costs that occur when inquiries are misdirected and elevated for review and action.

3 Sprints (1.5 months) 3.5 FTE			
Labor Category	# Labor Hours	Rate	Total
Scrum Master	240	\$ 155.03	\$ 37,207.20
SBA	240	\$ 155.03	\$ 37,207.20
QA	120	\$ 116.28	\$ 13,953.60
Developer	240	\$ 116.28	\$ 27,907.20
TOTAL:		840	\$ 116,275.20

No. of Employees	FTE (50% of time)	Employee GS Average Levels	GS Annual Salary	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Employees Cost
5	2.5	GS13 Step 5	\$121,000	5,000	\$60.5	\$302,500

Cost to develop web form: \$116,275.20. See chart in SS 12 for additional detail and breakdown of cost. The total cost estimate to the Federal government would be \$418,775.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.5,000.

This is a new information collection requests.

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.

No personally identifiable information collected in this portal will be published.

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.

DHS 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.

DHS does not request an exception to the certification of this information collection.