

USCIS Online Account Access (OMB-62)-006 Revision - Responses to 30-day FRN Public Comments

30-day FRN Citation (federalregister.gov): [87 FR 61093](https://www.federalregister.gov/documents/2022/10/07/2022-10-07-omb-62-006)

Public Comments (regulations.gov): [USCIS-2011-0015](https://www.regulations.gov/docket?D=USCIS-2011-0015)

Publish Dates: October 7, 2022 – November 7, 2022

Comment #	Commenter ID	Comment	USCIS Response
1.	0017	<p>Commenter: Angelo Paparelli</p> <p>The estimate of burden hours noted in the Federal Register concerning use of the USCIS Online Account Access database is understated because of many flaws in the system. In particular, a major flaw is the difficulty faced by an attorney whose Form G-28 appearance notice is already on file with USCIS to associate the files of existing clients. The system seems unable to associate the attorney's clients' cases to the attorney's account, and there is no help system or ticket request functionality, and no online guidance or search function that would help to resolve the disconnect.</p> <p>This must be remedied if the understated and inaccurate estimate of burden hours is to reflect actual, real-world use of the system.</p> <p>Angelo Paparelli (submitted solely on my own behalf) Certified Specialist in Immigration and Nationality Law State Bar of California Board of Legal Specialization</p>	<p>Response: USCIS appreciates the comment regarding burden hour estimates for the USCIS Online Account Access. USCIS calculates the time burden based on the estimated number of steps it would take a new user to create an online account. This includes the time to input an email address, create a password, complete the two-set verification, create security questions and select or provide responses for the questions posed.</p> <p>USCIS recognizes that there are concerns the current Form G-28 functionality, and we are working to make improvements in the functionality to create a better experience for representatives and their clients. However, the concerns about the G-28 functionality are outside the scope of this specific information collection. The representative account and online Form G-28 are covered under OMB control number 1615-0028.</p> <p>For technical support with the USCIS Online Account, please use this help form or visit the USCIS Contact Center at www.uscis.gov/contactcenter to connect with a USCIS representative. If you do not have internet access, you may call the USCIS Contact Center at 1-800-375-5283 (TTY 1-800-767-1833). The USCIS Contact Center provides information in English and Spanish.</p>

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2.		Commenter: Lutheran Social Services of New York’s Immigration Legal Program	
	0018	See attached file(s)	<p>Response: See Comment Responses below labeled with Commenter ID: 0018. The information in the attachment from the public comment (0018) was separated into different sections in this comment matrix to address each portion of information individually.</p> <p>See Comment # 3. - 4.</p>
3.		Commenter: Lutheran Social Services of New York’s Immigration Legal Program	
	0018	<p>II. Evaluate the accuracy of the agency’s estimate of the burden of the proposed collection of information</p> <p>USCIS has estimated the total amount of time for an average respondent to provide the information for the Online Account Access to be 0.167 hours. We agree the input of personal information, an email address, and answering the security questions requires 0.167 hours, but the whole process is significantly more time. Creating an account requires the person to first acknowledge reading the Department of Homeland Security Consent, DHS Privacy Notice, FBI Privacy Notice, Paper Reduction Act Burden Disclosure Notice, and the Terms of Use. Combined, these notices are approximately 18 pages with 5,609 words. The average amount of time to read these notices and terms alone is 0.26 hours. Reading the notices and terms should not be considered separate from the information collection process, because the notices and terms are essential for a person to understand what and why the information is being collected and their responsibilities with using the Online Accounts. The burden of</p>	<p>Response: Thank you for your comment. The time burdens are calculated based on an average across the entire respondent population. In addition, the Terms of Use, Privacy Act Notice, and other burden disclosure notifications are displayed continuously during the use of the online account, including with each subsequent login. While a respondent may initially need additional time to review the notices at the time of initial account creation, it is not necessary to review the disclosures or affirm such review with every subsequent login. In addition, the consistent display of the disclosure language allows the respondent to review the information in the disclosure at any time to refresh their recollection about what is contained in the notices.</p>

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		<p>failing to adhere to terms of use could result in criminal consequences and that should be considered by the person before accepting. The notices also detail responsibilities of the user, which are not found elsewhere. Therefore, the reading of the notices and terms is very much part of the information collection process, making USCIS' current estimate of the burden of the proposed collection of information vastly underestimated. Along with the estimated 0.167 to complete the registration process, the whole process should be estimated at 0.427 hours. USCIS estimates total number of respondents for the USCIS Online Account Access information collection is 3,397,160. Therefore, the more accurate estimate of the total public burden associated with the collection is 1,450,587.32 hours.</p>	
4.		<p>Commenter: Lutheran Social Services of New York's Immigration Legal Program</p>	
	<p>0018</p>	<p>III. Analyze how to enhance the quality, utility, and clarity of the information to be collected with the Online Account Access</p> <p>Based on years of using the Online Accountss, LSSNY-ILP has observed serval ways in which they can be improved for better quality, utility, and clarity.</p> <p><i>Enhance the clarity of experience and utility by allowing applicants to request new online access codes through their myUSCIS account</i></p> <p>When an applicant creates their myUSCIS Online Account after they filed an application, they need to input the USCIS generated application code to their Online Account. The applicant needs to</p>	<p>Response: This current Online Account Access information collection does not cover actions beyond creating and signing into an online account. Therefore, the comments about use of online access codes and the functionality within the representative account are outside the scope of this information collection.</p> <p>The comment about the FIRST FOIA process is also outside the scope of this information collection. That process is covered under the Freedom of Information Act/Privacy Act Request information collection (OMB control number 1615-0102).</p>

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		<p>wait for the code by mail. However, if the code could be generated through the Online Account portal that would be quicker and more secure.</p> <p><i>Enhance clarity about a practitioner's cases on the myUSCIS Online Account</i></p> <p>In a practitioner's myUSCIS Online Account, it will list cases they have submitted. However, by looking at that page, the practitioner does not have clarity about the status of those cases. Instead, the practitioner needs to individually click on them to determine if they are still pending a decision or if they have been closed. This can be time consuming and a burden when the practitioner has many cases. The burden can be minimized if the practitioner's case list page could provide more information about the status of each case.</p> <p><i>Enhance clarity about a practitioner's cases on the FIRST Online Account</i></p> <p>After a practitioner files a FOIA request on behalf of a client through FIRST and is later told the request is closed, the practitioner is left unaware of the result of the request. More information should be given to the practitioner through FIRST about the whether the request was fulfilled, how it was fulfilled, or if it was denied.</p>	
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