

**SUPPORTING STATEMENT FOR
Document Verification Request and Supplement
OMB Control No.: 1615-0101
COLLECTION INSTRUMENT(S): G-845**

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 1986, the Immigration Reform and Control Act (IRCA) (P.L. 99-603, 100 Stat. 3359 (Nov. 6, 1986)), instituted requirements for large entitlement programs to determine citizenship or immigration status for certain benefits, including: temporary assistance to needy families, Medicaid, nutritional assistance, unemployment compensation, educational assistance, and certain housing assistance programs. IRCA further authorized the Attorney General to establish a system for electronic verification of citizenship and immigration status and, in 1987, Systematic Alien Verification for Entitlements (SAVE), which previously had existed as a pilot program, began providing verification services for those benefits.

Nearly a decade later, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 ((PRWORA) (P.L. 104-193, 110 Stat. 2105 (Aug. 22, 1996)):

- Expanded SAVE use by instituting citizenship and immigration status verification requirements related to eligibility for additional federal public benefits; and
- Restricted noncitizen eligibility for many benefits to “qualified” noncitizens (a subset of lawfully present noncitizens).

PRWORA also permitted citizenship and immigration status verification by state agencies that grant benefits and licenses.

In the same year, Congress also enacted, and the President signed into law, the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) (P.L. 104-208, 110 Stat. 3009-546 (Sept. 30, 1996)), which requires U.S. Citizenship and Immigration Services (USCIS) to respond to inquiries from federal, state, and local benefit-issuing agencies seeking to verify or determine, for any lawful purpose, the citizenship or immigration status of any individual within their jurisdictions. SAVE is the mechanism that USCIS uses for this purpose.

The Real ID Act of 2005 (P.L. 109-13, 119 Stat. 231, 302 (May 11, 2005)), expanded state use of SAVE by establishing minimum eligibility standards for state-issued driver’s

licenses and identification (ID) cards to be acceptable for official federal purposes, such as boarding federally regulated commercial aircraft or entering federal facilities. As part of these standards, DHS regulations require states to use SAVE to verify the immigration status of non-U.S. citizen applicants for REAL ID cards, and permit states to use SAVE to verify certain naturalized and derived U.S. citizen applicants for REAL ID cards.

The Patient Protection and Affordable Care Act (PPACA) of 2010 (P.L. 111-148, 124 Stat. 119 (March 23, 2010)), further expanded use of SAVE. The PPACA established federal and state health insurance marketplaces, also known as exchanges, through which eligible U.S. citizens and noncitizens “lawfully present in the United States” can apply for ACA, Medicaid, and/or Children’s Health Insurance Program health insurance plans. Health insurance marketplaces and state health care exchanges are required to use SAVE to verify the immigration status and naturalized or acquired citizenship of certain applicants for qualified health benefits and subsidies offered through the federal and state health insurance exchanges.

Section 3405(d) of the FAA Extension, Safety and Security Act of 2016 (P.L. 114-190, 130 Stat. 615 (Jul. 15, 2016)) directed the Secretary of Homeland Security to authorize Airport Operators to have direct access to SAVE to determine the eligibility of individuals seeking unescorted access to any security identification display area of an airport. USCIS and the Transportation Security Administration have coordinated their responsibilities and issued guidance concerning implementation of this requirement.

Based on these authorities, the SAVE Program responds to requests from Federal, state, territorial, tribal and local government benefit granting and licensing agencies, and Airport Operators, to verify immigration status/category and naturalized/acquired citizenship for a wide variety of public benefits and licenses.

- 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.**

SAVE Verification Process

In the SAVE verification process, a user agency verifies an applicant’s citizenship or immigration status by submitting an initial verification request with the public benefit applicant’s identifying information into SAVE. USCIS queries a broad range of federal immigration databases for records that match the applicant information submitted to SAVE. If SAVE verifies the individual’s citizenship or immigration status/category and the user agency does not find a material discrepancy between the response and the documentation provided by the applicant, the verification process is complete. The agency may use the citizenship or immigration status information from SAVE to help determine whether the applicant is eligible or ineligible for the benefit or license with respect to citizenship or immigration status requirements.

If the initial SAVE response does not verify citizenship or an immigration status/category (e.g. due to finding no immigration record pertaining to the applicant during initial verification) or there is a discrepancy between the response and the documentation provided by the applicant, the next step is for the agency to submit a request for additional verification.¹ Second-step verification is conducted without a copy of the applicant's immigration documentation, while third-step verification requires a copy of the applicant's immigration documentation. User agencies can skip second-step verification by immediately submitting a third-step verification with a copy of the applicant's immigration documentation.

In addition, SAVE may require a user agency to skip second-step verification without a document and instead submit a third-step verification with a copy of the applicant's immigration documentation, such as when no immigration record for the applicant is found through initial verification. For this situation, in the future, SAVE may instead require the agency to make a second-step request with a document, electronically read the information from the applicant's immigration documentation, use it to re-query immigration databases, and provide an automated second-step response based upon any matching records. Regardless of how a second-step response is provided, the agency may submit a request for third step verification if there is a material discrepancy between the response and the documentation provided by the applicant or the applicant requests additional verification.

In the future, SAVE may also require submission of a document with all second-step verification requests if/when system enhancements render second-step verification without a document no longer worthwhile due to most second-step requests requiring third-step verification, or the second-step verification volume not warranting the cost of maintaining it as a separate step in the SAVE verification process.

New Information Collection – Immigration Document and Type

SAVE is implementing a change in the process to collect the document type(s) the user agency reviewed to obtain and provide immigration identification numbers. For example, requiring the user agency to select the document type for the information submitted will provide data on whether certain document types have higher rates of manual verification. If certain documents have higher rates of bad manual data entry, SAVE can inform user agencies to increase the quality of the data submitted, and allow us to improve processing times. SAVE may also require submission of a document to help SAVE identify bad data issues that are document specific.

New Information Collection – Reason for Submitting Case for Additional Verification that received an initial verification of an immigration status/category.

¹ Additional verification is currently a manual, rather than automated, process. A USCIS status verifier conducts a comprehensive review of DHS systems, and when necessary, a review of the individual's physical A-file, to provide a response to the user agency. Approximately 10 percent of SAVE queries proceed to additional verification.

Currently, user agencies may request additional verification following the receipt of an initial verification response from SAVE and not provide a reason. In the future, SAVE will collect a reason code for an additional verification request (for example, “different immigration status expected,” “different date needed,” and “other”). Collecting reason codes will allow SAVE to better understand why agencies need this information, reduce unnecessary queries, and allow SAVE to improve the quality of first step responses.

Reason For Agency Closing a Case when Prompted to Institute Additional Verification

SAVE provides a non-final response when one or more additional steps are required to verify the benefit applicant’s citizenship or immigration status. For example, if SAVE is not able to provide an initial verification, SAVE instead provides an “Institute Additional Verification” or “Institute Additional Verification With Document” response to prompt the agency to initiate the next step in the process. In practice, agencies sometimes close cases rather than submitting them for additional verification. However, because SAVE does not collect the reason a user agency closes a case in this situation, SAVE does not know if the closure is for a legitimate reason (e.g., the individual withdrew the application, the agency disapproved the application on a basis other than lack of an eligible immigration status, or the agency is aware of a data entry error in the verification request) rather than an illegitimate reason that violates SAVE rules (e.g., denying an application based upon a non-final response).

This update is documenting that SAVE is adding a function (i.e., additional screens) to its user interface within its electronic verification system to require user agencies that do not complete additional verifications to identify the reason why the agency closed the case (for example, data error or duplicate case submission). This information will allow Headquarters Account Compliance to identify agencies that are not following this significant SAVE requirement, so that compliance actions can be taken.

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.**

Currently, USCIS allows for the electronic verification of the citizenship and immigration status of applicants of certain types of federally-funded benefits through the Verification Information System (VIS). The URL is <https://save.uscis.gov/save/app/client/ui/home>. SAVE users consent to electronic only submission in their SAVE Memorandum of Agreement and funding documents. As such, SAVE user agencies electronically institute additional verification and scan and upload the applicant’s immigration documents. SAVE only accepts paper G-845 submissions when preapproved by SAVE in extraordinary circumstances, and only as determined by SAVE.

For this information collection, USCIS is phasing in usability testing. For example, for Additional Verification Reason capture, USCIS SAVE is currently collaborating with internal stakeholders and conducting feedback sessions on the draft Interface Control Agreement, which serves as our definitive technical requirements package. Going forward SAVE will maintain engagement with users in all areas of this information collection, including conducting certification testing to ensure SAVE program compliance.

Specific to this information collection, USCIS has conducted usability testing that informed this instant revision and will continue to do so going forward. For example, for Additional Verification Reason capture, USCIS SAVE collaborated with internal stakeholders and conducted feedback sessions on the draft Interface Control Agreement, which serves as our definitive technical requirements package. The outreach to the impacted G-845 respondents found that no use of the paper file was going to be made, and as a result of this, USCIS is updating the MOU for all respondents and eliminating the paper form and instruction option from the burden captured for this form, resulting in 5 hours of burden hour savings. Going forward SAVE will maintain engagement with users in all areas of this information collection, including conducting certification testing to ensure SAVE program compliance, and will use that feedback to inform future updates, as appropriate.

USCIS uses various tools to collect feedback from end users of USCIS information collections. These tools include surveys or focus groups designed to collect general information, as well as public feedback submitted to USCIS either in response to an official solicitation of public comments from Federal Register publications or submitted proactively through USCIS' robust external outreach activities with stakeholders (see, e.g. www.uscis.dhs.gov/outreach). USCIS also performed usability testing on USCIS Forms I-765, N-400, and I-485 (the three highest-filing forms) with the goal of studying cross-cutting issues that impact the responding public across the entirety of the USCIS collections of information USCIS.

In addition to feedback from external stakeholders, our analysis considers consultation with internal agency stakeholders regarding such activities including, but not limited to, document submission, evidentiary requirements, and like activities. USCIS extensively engages with various program, policy, and intake teams for feedback on the information collections. USCIS analyzes the results of all of these efforts to identify necessary modifications to the collection tools approved for use under the Paperwork Reduction Act. Such modifications could include clarifying edits, potential question removal, and instructional updates, all intended to further support the respondent's experience in complying with a collection of information. The collection of information proposed in this current submission is the cumulative result of all of this analysis and studies conducted.

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.**

A review of the USCIS Forms Inventory Report revealed no duplication of efforts. There is no similar information currently available that can be used for this purpose.

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.**

This collection of information 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.**

USCIS, SAVE is required to implement this collection by IRCA, PRWORA, IIRIRA and the Real ID Act of 2005.

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 October 26, 2023 USCIS published a 60-day notice in the Federal Register at 88 FR 73609. USCIS received one comment after publishing that notice. However, the comment context was unrelated to the G-845 and is considered out of scope.

On March 26, 2024, USCIS published a 30-day notice in the Federal Register at 89 FR 20993. 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 to respondents.

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-006 - Systematic Alien Verification for Entitlements (SAVE)

Program and subsequent updates.

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

- DHS/USCIS-004 - Systematic Alien Verification for Entitlements Program System of Records, November 8, 2016, 81 FR 78619.

- 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.**

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.**

Type of	Form Name /	No. of	No. of	Total	Avg.	Total	Avg.	Total Annual
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Respondent	Form Number	Respondents FY2023	Responses per Respondent	Number of Responses	Burden per Response (in hours)	Annual Burden (in hours)	Hourly Wage Rate	Respondent Cost (in dollars)
State and local governments	VIS Query	9,990,606	1	9,990,606	0.085	849,202	\$43.45	\$36,897,806
Federal governments	VIS Query	11,587,377	1	11,587,377	0.085	984,927	\$43.45	\$42,795,080
	VIS Query Subtotal	21,577,983		21,577,983		1,834,129		\$79,692,886
Total				21,577,983		1,834,129		\$79,692,886

* The above Average Hourly Wage Rate is the [May 2022 Bureau of Labor Statistics](#) average wage for All Occupations \$29.76 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$43.45. The selection of “All Occupations” was chosen because respondents to this collection could be expected 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 capital or start-up costs associated with this information. However, there is currently a fee of \$1.50 for federal agencies and a fee of \$1.00 for non-federal agencies for conducting queries using the VIS. There is a fee of \$2.00 for submitting a Form G-845. There is no additional fee for submitting the Form G-845 Supplement.

SAVE has made public that the federal agency charge will be \$1.50 per VIS verification case in Fiscal Year (FY) 2024 (Oct. 1, 2023 – Sept. 30, 2024) and incrementally increase until reaching \$3.10 starting in FY 2026.

Federal Agency Charge Per Verification Case:
FY 2024 \$1.50

SAVE also intends to increase the VIS transaction charge for non-federal user agencies, but with a longer phase-in period due to many non-federal agencies having smaller budgets and longer budget cycles, reaching \$3.10 by FY 2028.

Non-Federal Agency Charge Per Verification Case:
FY 2024 \$1.00

Additionally, SAVE charges a minimum monthly service charge of \$25 for each month in which a user agency submits at least one initial verification request.

USCIS estimates that zero G-845 and zero G-845 Supplement paper forms will be submitted. Therefore, with USCIS' estimate that zero G-845 and Supplement respondents would incur any out of pocket cost burden associated with mailing the paper form, the estimated out of pocket cost to respondents would be zero respondents multiplied by the average mailing costs of \$1.26, which equals **\$0**.

- 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.**

Annualized Cost Analysis

VIS Query (Federal government):

Collection and Processing Cost: \$17,381,238

This figure is calculated by multiplying the estimated number of respondents by the fee, which equals \$17,381,238 (Calculation: 11,587,492 x \$1.50 = \$17,381,238).

VIS Query (State and local government):

Collection and Processing Cost: \$9,990,706

This figure is calculated by multiplying the estimated number of respondents by the fee, which equals \$9,990,706 (Calculation: 9,990,706 x \$1.00 = \$9,990,706).

Form G-845:

Collection and Processing Cost: \$0

This figure is calculated by multiplying the estimated number of respondents by the fee, which equals \$14 (Calculation: 0 x \$2 = \$0).

Form G-845 Supplement:

Collection and Processing Cost: \$0

This figure is calculated by multiplying the estimated number of respondents by the average time USCIS requires to collect and process information (0.5 hours) by the suggested average hourly rate for clerical, officer, and supervisory time with benefits (\$40), which equals \$880 (Calculation: 0 x 0.5 hours x \$40 = \$0).

Government Cost

The estimated cost of the program to the Government is the sum of the collection and processing costs for each information collection instrument that is part of this information collection (see breakdowns under “Annualized Cost Analysis” above). The total estimated cost of the program to the Federal government is **\$27,371,944**.

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)	Difference
VIS Query	1,653,106	1,834,129	181,023			
G-845	1	0	-1			
G-845 Supplement	4	0	-4			
Total(s)	1,653,111	1,834,129	181,018			

There was an increase in the total estimated annual hour burden due to an increase in the average burden per response on the VIS Query from 0.083 hours to 0.085 hours and an

increase in the agency estimated number of respondents. This result stems from the addition of requirements when a case is submitted for additional verification to select an immigration document type and select reason for submitting the case for additional verification.

Additionally, there was a decrease in the agency estimated number of respondents to zero for both the G-845 and G-845 Supplement due to USCIS not anticipating any respondents to submit the paper-based forms during the three-year OMB approval period requested and the SAVE VIS query functioning as an electronic version of the Form G-845. In 2018, SAVE began to transition away from use of the paper process and now only provides a paper-based verification method for agencies in extraordinary situations as determined by the SAVE Program, as documented in the SAVE Program Guide, 5.1.2 Paper-based Verification section. A paper-based G-845 and Supplement has not been approved by SAVE since FY 2019. Since that time, any paper-based submission are rejected, as outlined in the SAVE Program Guide. The paper-based G-845 and Supplement have been unused for approximately four years. The SAVE Program will therefore request elimination of the paper form in a future PRA revision when resources are available to pursue this effort. Until that time, SAVE will maintain the paper option for extraordinary uses only.

There are no other 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
G-845	\$9	\$0	-\$9			
G-845 Supplement	\$55	\$0	-\$55			
Total(s)	\$64	\$0	-\$64			

There was a decrease in the total estimated annual cost burden due to a decrease in the agency estimated number of respondents to zero for both the G-845 and G-845 Supplement due to USCIS not anticipating any respondents to submit the paper-based forms during the three-year OMB approval period requested and the SAVE VIS query functioning as an electronic version of the Form G-845. In 2018, SAVE began to transition away from use of the paper process and now only provides a paper-based verification method for agencies in extraordinary situations as determined by the SAVE Program, as documented in the SAVE Program Guide, 5.1.2 Paper-based Verification section. A paper-based G-845 and Supplement has not been approved by SAVE since FY 2019. Since that time, any paper-based submissions are rejected, as outlined in the SAVE Program Guide. The paper-based G-845 and Supplement have been unused for approximately four years. The SAVE Program will therefore request elimination of the

paper form in a future PRA revision when resources are available to pursue this effort. Until that time, SAVE will maintain the paper option for extraordinary uses only.

There are no other 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.