

**SUPPORTING STATEMENT FOR
API (Application Programming Interface) Production Access Request
OMB Control No.: 1615-NEW
COLLECTION INSTRUMENT(S): G-1595**

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.**

USCIS has newly established a program to enable third party software development companies to access sandbox and production environments via Application Programming Interfaces (API) to our software systems. In order to access production environments, USCIS requires these companies identify responsible individuals, follow the law with regards to privacy and the Americans with Disabilities Act, and

Per the following statues and authorities: The information requested on this form is collected pursuant to the Immigration and Nationality Act (INA), as amended; the Homeland Security Act of 2002 (Public Law 107–296); the e-Government Act of 2002 (Public Law 107-347), the Rehabilitation Act of 1973 (Public Law 93-112), the Government Paperwork Elimination Act (Public Law 105-277), and 44 U.S.C. § 3534, and; 8 USC §1103(a).

- 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 will be used to assure USCIS that the applicant software development companies have met the minimum requirements of the laws as outlined above. Once the API team have reviewed the information and found it to be sufficient, they will invite the third-party software development business to present a demonstration of their features that use the API to which they are requesting production access.

- 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.**

USCIS conducted usability testing virtually with potential developer users of developer.uscis.gov in February 2023. The outreach helped to guide the development of the tool that will be released to the public upon OMB-OIRA approval.

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 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 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.

There are no other information collections focused on software integration with extra-governmental entities at this time.

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 may impact small businesses if they decide that they would like to use USCIS APIs to develop features in their software.

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.

This collection is intended to assist USCIS in evaluating whether the company seeking to use USCIS' APIs follows appropriate laws and best practices where privacy and accessibility are concerned, in order to evaluate whether USCIS can, in good faith, give

access to our production environments. This information is not available through other means.

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 December 1, 2023, USCIS published a 60-day notice in the Federal Register at 88 FR 83956. USCIS did receive one comment after publishing that notice resulting in USCIS updating the instructions for clarity.

On April 12, 2024, USCIS published a 30-day notice in the Federal Register at 89 FR 25891. USCIS did receive two comments after publishing that notice with one of the comments supporting the new API production request and the other comment involved questions about the API process that USCIS addressed.

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/ALL/PIA-015 DHS Web Portals, which covers the establishment of an online “portal” allowing authorized users to obtain, post and exchange information, access common resources, and generally communicate with similarly situated and interested individuals;
- DHS/ALL/PIA-059 DHS Employee Collaboration Tools, which covers the use of MS One Drive; and
- Forthcoming Accounts Public PIA, which will cover how public accounts are created.

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

- DHS/ALL-037 E-Authentication Records System of Records, which covers members of the public and external stakeholders seeking electronic access to DHS programs and applications.

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 in this collection.

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.**

		A	B	C (=AxB)	D	E (=CxD)	F	(=ExF)
Type of Respondent	Form Name / Form Number	#. of Respondents	#. of Responses per Respondent	# of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
Business or other for-profit	API Production Access / G-1595	20	1	20	0.91	18	\$84.93	\$1,546
Total				20		18		\$1,546

* The above Average Hourly Wage Rate is the [May 2021 Bureau of Labor Statistics](#) average wage for Software Developers \$58.17 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$84.93. The selection of “Software Developers” was chosen because respondents to this collection specifically work in Software Development Businesses.

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, start-up, operational or maintenance costs associated with this collection of information. There is no filing fee for G-1595.

However, this information collection may impose some out-of-pocket costs on respondents in addition to the time burden for the form's preparation. Costs may include payments for attorney and legal fees, acquiring and maintaining required software and credentials for compliance purposes, and any costs associated with gathering documentation. USCIS estimates the average cost of this information collection may vary widely, from as little as \$0 to \$500 per respondent. USCIS estimates that the average cost for these activities is \$200 and that approximately 25 percent of the total respondent population may incur this cost. The estimated out-of-pocket cost to respondents is 20 respondents multiplied by 25 percent of the population multiplied by the average cost per response of \$200, which equals **\$1,000**. The estimated cost per respondent is \$1,000 divided by 20 respondents, which equals \$50 per respondent.

- 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.**

The estimated cost of the program to the Government is calculated by multiplying the estimated number of respondents (20) x 40 minutes (time required to intake and process information from the request) x \$42 (average hourly rate for clerical, officer, and managerial time with benefits), which equals \$563. The total cost to the Federal government is **\$563**.

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

The G-1595 is a new information collection. There is no previous hour burden or cost burden estimates to be changed or adjusted.

- 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.