

**SUPPORTING STATEMENT FOR  
Citizenship Integration Grant Program (CIGP) Program Evaluation  
OMB Control No.: 1615-NEW**

**COLLECTION INSTRUMENT(S): G-1608**

- Implementation Evaluation Grant Recipient Staff Web Survey,
- Implementation Evaluation Participant Web Survey,
- Implementation Evaluation Grant Recipient Staff Virtual Interview,
- Implementation Evaluation Participant Virtual Interview,
- Outcome Evaluation Grant Recipient Staff Web Survey,
- Outcome Evaluation Participant Web Survey,
- Outcome Evaluation Grant Recipient Staff Virtual Interview, and
- Outcome Evaluation Participant Virtual Interview

**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.**

**Introduction**

U.S. Citizenship and Immigration Services (USCIS) and the Citizenship and Integration Grant Program (CIGP) are the main subjects of this evaluation. To give immigrants more opportunity to acquire the knowledge and skills required to integrate into American culture, CIGP intends to increase the accessibility of high-quality citizenship preparation services. The Community and Regional Integration Network Grant (CARING) and Citizenship Instruction and Naturalization Application Services (CINAS) are options available through the CIGP. Optimal Solutions Group LLC has been awarded the Program Analysis and Evaluation (PA&E) Contract to evaluate the CINAS and CARING grant programs.

**Brief Overview of Methods**

A mixed-methods approach will be used to evaluate the CIGP, gathering qualitative and quantitative data through administrative data, surveys, and interviews. The program implementation and results for intended noncitizens from grants granted to grantees in Fiscal Year (FY) 2018 through FY 2021. The evaluation is a two-stage study. The first phase (implementation evaluation) will determine whether CARING and CINAS are being carried out in accordance with the grantees' proposed plan. The second stage (outcome evaluation) is a review of the program outcomes, which will show the effect these programs have on CIGP's goals.

**Authority to Evaluate**

The PA&E Division of the Office of the Chief Financial Officer (OCFO) of the Department of Homeland Security (DHS) coordinates, implements, and supervises the

Department's centralized and decentralized evaluation functions. It is also in charge of developing knowledge and expertise in evaluation. In order to meet the requirements of the Foundations for Evidence-Based Policymaking Act of 2018 (the "Evidence Act"), Pub. L. 115-435, and related Office of Management and Budget (OMB) guidance, PA&E collaborates closely with all Headquarters Offices and Components across DHS to develop and implement evaluations that address priorities set by the Secretary and Components. To increase understanding and spread knowledge on subjects that can be utilized to inform program and policy decisions, PA&E sponsors and conducts social science and evaluation research. The PA&E contract to evaluate the CINAS and CARING grant programs has been awarded to a third-party evaluation contractor (Contractor).

### **Statutes and Regulations Mandating or Authorizing the Collection of Information**

- A. Public Law 115-435, 132 Stat.5529, "Foundations for Evidence-Based Policymaking Act of 2018" ('Evidence Act')
- B. Public Law 114-264, 130 Stat. 1371, "Program Management Improvement Accountability Act of 2016 (PMIAA)"
- C. Public Law 103-62, 107 Stat. 285, "Government Performance and Results Act of 1993 (GPRA)"
- D. Public Law 111-352, 124 Stat. 3866, "Government Performance and Results Act Modernization Act of 2010 (GPRAMA)"

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.**

#### **Questions to be answered.**

The contractor will collect data from a variety of sources. The implementation evaluation will examine the CIGP's implementation and outputs. The following research inquiries will be addressed:

- Q1. How did CINAS and CARING grant recipients implement the grant? What were the causes of variation among grant recipients?
- Q2. What external factors influenced implementation?
- Q3. Did implementation result in the intended outputs?
- Q4. Are participants being reached as intended?
- Q5. How does receipt of a grant influence organizational capacity?

The outcomes evaluation will examine the CIGP's short-term, intermediate, and long-term outcomes and includes the following research questions:

- Q6. To what extent do CINAS and CARING program participants increase their English language proficiency?
- Q7. To what extent do CINAS and CARING program participants increase their

United States civics knowledge?

- Q8. To what extent do CINAS and CARING program participants apply for naturalization? How does this compare to similar eligible lawful permanent residents (LPR) who did not enroll in the program?
- Q9. To what extent are CINAS and CARING program participants successful in obtaining naturalization? How does this compare to similar eligible LPRs who did not enroll in the program?
- Q10. Which services provided through grantees help program participants achieve intended outcomes?

### **Information that will be collected**

The contractor will gather the following information shown under **Primary data** to answer the research questions for the implementation and outcome evaluations. Secondary data, obtained directly by USCIS through the grant program administration, will also be used to answer research questions for the implementation and outcome evaluations. Specific questions to be answered using data are indicated in parentheses.

- **Primary data**
  - Virtual interviews with CINAS and CARING grant recipient staff. (Q1, Q2, Q3, Q4, & Q10)
  - Web surveys with CINAS and CARING grant recipient staff. (Q1, Q2, Q3, Q5, & Q10)
  - Web surveys with program participants. (Q4, Q7 & Q10)
  - Virtual interviews with program participants. (Q4 & Q10)
- **Secondary data**
  - Grant applications
  - Grant recipient administrative data (FY2018 to FY2023) for grantees enrolled into the program 2018-2021.
    - Plans and progress reports (Q1, Q3 & Q4)
    - English proficiency and civics test scores (Q3 & Q6)
    - Grant recipient characteristics (Q1, Q4 & Q5)
    - Participant lists (Q1 and to create sampling frame for online surveys and interviews)
  - USCIS Electronic Immigration System, Computer Linked Application Information Management System, Electronic Information System (ELIS), and Central Index System data (FY2018 to FY2023).
    - I-485 (Application to Register Permanent Residence or Adjust Status). **USE:** This data will be used to provide demographics for survey and interview participants. Additionally, we will use these data elements to develop a comparison group of similar eligible LPRs.
    - N-400 (Application for Naturalization). (Q8)
    - N-652 (Naturalization Test Performance) (Q5, Q6, Q7 & Q9)
  - Census data for the number, proportion, and demographic characteristics

of immigrants residing in areas outreached by the programs and how these compare to areas not targeted by the programs. (Q4)

**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.**

After receiving feedback on the survey instruments from USCIS, Optimal Solutions Group LLC the vendor awarded the Program Analysis and Evaluation (PA&E) Contract to evaluate the CINAS and CARING grant programs, pretested in December 2023 the online version of the web survey instrument, virtual interviews, and associated data collection materials with up to nine participants for each instrument to ensure reliability, validity, content coverage, context specificity, and cultural appropriateness. Based on the culturally diverse population of respondents, it was critical to pretest the instruments with program participants or individuals with similar background (time in the U.S., English proficiency, countries of origins, etc.).

Optimal has conducted numerous pretests of survey instruments using a cognitive pretesting approach that integrates think-aloud and retrospective probing methods. This pretesting approach ensures that the survey instrument produces high-quality data, reduces burden, and protects respondents from unwarranted and inappropriate questions. Based on the pretesting results, the data collection materials, and the web survey content, layout, and functionality were revised to incorporate participants' feedback. The final version of the instruments and data collection materials were submitted to USCIS for approval and further revised, as needed. Optimal also submitted a report summarizing the pretesting results, recommended changes and rationale for each change made, and refinements to reduce burden and protect confidentiality.

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](http://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.**

Data already collected by the grantees, USCIS, and Census will be used to the fullest extent possible as described above. The data collected with this request are unique to the evaluation of the program and other data are not sufficient to answer the evaluation questions.

**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 impacts small businesses or other small entities. USCIS has minimized the amount of information collected from small entities by only requesting the information not available in administrative program documents. USCIS has also provided for electronic submission of the information.

**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.**

Without the data gathered through this evaluation, USCIS will not understand if and how its grants program is effective at providing naturalization and citizenship instruction support. By gaining a more thorough understanding of how grantees are implementing the program and the effectiveness of the activities and services provided by the program, USCIS can improve the program's management and administration practices, which will in turn lead to improved outcomes for program participants and ensure efficient use of taxpayer funds. The data is not available in any of USCIS' systems and there is no other way of obtaining the data needed for the evaluation.

**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.**

There are no special circumstances applicable to this information collection. 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 April 11, 2024, USCIS published a 60-day notice in the Federal Register at 89 FR 25892. USCIS received three (3) comments after publishing the 60-day notice. Two of

the comments received were nongermane to the new information collection. The third comment resulted in the following changes: removal of duplicative questions, clarifying edits to questions, and adjusting the estimated time burden to respond to questions to account for potential language barriers and the removal of duplicative questions. USCIS responses to the comments are available in the comment matrix posted in the docket for this information collection.

On August 1, 2024, USCIS published a 30-day notice in the Federal Register at 89 FR 62763. USCIS did receive one comment that falls outside the scope of this information collection based on the criteria published in the Federal Register Notice. The comment is posted in the docket for this information collection.

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

USCIS does not provide payments or gifts to respondents in connection with this information collection.

**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, only notification that the Contractor and USCIS will attempt to maintain confidentiality. However, all survey responses will be submitted anonymously and will only be connected to the unique web-based survey link. Interviewees will be informed that their interview responses will be aggregated to the degree possible and be de-identified in public reporting to ensure responses are not attributable to individuals.

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

- DHS/ALL-002 Department of Homeland Security (DHS) Mailing and Other Lists System, November 25, 2008, 73 FR 71659, which covers information obtain from individuals who have conducted business with USCIS and have provided contact information.
- DHS/USCIS/ICE/CBP001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556, which covers information obtained from ELIS to identify and contact participants.

This collection is covered under the following Privacy Impact Assessment:

- DHS/USCIS/PIA-056(c) USCIS Electronic Information System (USCIS ELIS) - June 2020, which covers information on immigration benefit requestors, including A-numbers, and their immigration status, associated documents, and contact information.
- DHS/USCIS/PIA-066 Citizenship and Integration Grant Program - May 2017, which covers information pertaining to individuals participating in USCIS grant programs aimed at assisting USCIS and individuals seeking citizenship/naturalization.

- DHS/USCIS/PIA-089 USCIS Outreach and Engagement Program - September 2023, which covers information obtained from existing USCIS systems and/or forms used to contact immigration and/or naturalization benefit requestors during outreach and engagement activities and initiatives.
- DHS/ALL/PIA-069 DHS Surveys, Interviews, and Focus Groups - September 2018, which covers information collected and maintained during surveys and focus groups to assist USCIS in improving public-facing services.

- 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.**

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
Individuals or Households	Implementation Evaluation Participant Web Survey, G-1608	580	1	580	0.50	290	\$43.45	\$12,600.50
Not-for-profit institutions	Implementation Evaluation Grant Recipient Staff Web Survey, G-1608	110	1	110	0.50	55	\$38.13	\$2,097.15
Individuals or households	Implementation Evaluation Participant Virtual Interview, G-1608	48	1	48	0.75	36	\$43.45	\$1,564.20
Not-for-profit institutions	Implementation Evaluation Grant Recipient Staff Virtual Interview, G-1608	28	1	28	0.75	21	\$38.13	\$800.73
Individuals or households	Outcome Evaluation Participant Web Survey, G-1608	580	1	580	0.50	290	\$43.45	\$12,600.50
Not-for-profit institutions	Outcome Evaluation Grant Recipient Staff Web Survey, G-1608	110	1	110	0.33	36	\$38.13	\$1,384.12
Individuals or households	Outcome Evaluation Participant Virtual Interview, G-1608	48	1	48	0.75	36	\$43.45	\$1,564.20
Not-for-profit institutions	Outcome Evaluation Grant Recipient Staff Virtual Interview, G-1608	28	1	28	0.75	21	38.13	\$800.73
<b>Total</b>				<b>1,532</b>		<b>785</b>		<b>\$33,412.13</b>

Note 1: Based on the grantees list for FY18-FY21, there are 104 CINAS grantees and 6 CARING grantees.

Note 2: Expected 25% survey response rate for grant recipient staff and 10% for participants.

Note 3: The above Average Hourly Wage Rate for grant recipient staff data collection is based on the [May 2022 Bureau of Labor Statistics](#) average annual salary for [Social and Community Service Managers](#) of \$79,310 (\$38.13 per hour).

Note 4: The above Average Hourly Wage Rate is the [May 2022 Bureau of Labor Statistics](#) average wage for All Occupations of \$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 is no other annual cost burden to respondents or record keepers.

- 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.**

#### **Government Cost**

The estimated cost to the Federal government is **\$90,801**. This includes the costs associated with the contractor conducting the study, and the salaries of the assigned DHS employees (see Exhibit A1, below). The cost of the United States Citizenship and Immigration Services (USCIS) employee involved in administration of the survey and study (the DHS Contracting Officer's Representative [COR]) is estimated at GS-13, Step 1, at \$51.35 per hour based on 2,080 hours per year. USCIS anticipates that this person will work 80 hours per year for 1 year on this initiative. The annual cost for this USCIS employee over the course of this study is \$4,108. The cost of the USCIS employee involved in study oversight (the DHS program manager) is estimated at GS-14, Step 1, at \$60.68 per hour based on 2,080 hours per year. USCIS anticipates that this person will work 80 hours per year for 1 year. The annual cost for this USCIS employee over the course of this study is \$4,854, although this would not be costs added. The annual cost for both of these USCIS employees over the course of this study is \$8,962. Federal

employee pay rates are based on the 2022 General Schedule pay scale for the Washington, D.C., locality 4.

<b>Estimates</b>	<b>DHS COR</b>	<b>DHS Program Manager</b>	<b>Evaluation Contractor</b>	<b>Total Federal Costs</b>
Number of employees	1	1	N/A	N/A
Hours anticipated	80	80	N/A	N/A
Average hourly pay	\$51.35	\$60.68	N/A	N/A
<b>Total Cost</b>	<b>\$4,108</b>	<b>\$4,854</b>	<b>\$81,839</b>	<b>99,401</b>

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

The CIGP Program Evaluation 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.**

Please see Supporting Statement B.

**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.