

Form G-1608-001 NEW - Responses to 60-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2024-0003](#)

60-day FRN Citation (federalregister.gov): [89 FR 25892](#)

Publish Dates: April 12, 2024 – June 11, 2024

Comment Item #	Comment (Note: Public comments are copied and pasted here as written by the commenter, except where a letter is submitted, and a summary is provided.)	USCIS Response
<u>1.</u>	Commenter: jean public Commenter ID: USCIS-2024-0003-0010	
	<i>i am totally against tax[ayes payingt for this program and do nto think it helps america at all. i find this dept to be one that works for foreigners and against the interests of the american people, who 70% of want the borders shut down and no more foeigners coming across and want the vandals you have let come into this countty be transportd all over for their free telephones, free medical care, free education, free transport, free rent and free food to go back to teir own country and start paying for those things again. we have our own american citizens who cant get jobs and cant get housing or anything because they are being soaked to pay for these foreign fre3eloaders. where the hell do you get off hurting american citizens this way with this high taxation for these foreigners and soaking us all to death with high taxes and we cant et houwsing, or prescription drugs. oru food prices are going up up up because we are being taxed to pay for 20 mllion fre3eloaders here taking advantage of us. it all sucks. it needs change. i am not in favor of this regulatory agency at all. it is anti american to the max. shut i8t down. and stop teh border invasion.</i>	USCIS has determined that this comment falls outside the scope of this information collection based on the criteria published in the Federal Register Notice.
<u>2.</u>	Commenter: WhoPoo App Commenter ID: USCIS-2024-0003-0011	
	<i>Build the wall. At the start of 2023, the net cost of illegal immigration for the United States – at the federal, state, and local levels – was at least \$150.7 billion. FAIR arrived at this number by subtracting the tax revenue paid by illegal aliens – just under \$32 billion – from the gross negative economic impact of illegal immigration, \$182 billion. In 2017, the estimated net cost of illegal migration was approximately \$116 billion. In just 5 years, the cost to Americans has increased by nearly \$35 billion. Illegal immigration costs each American taxpayer \$1,156 per year (\$957 after factoring in taxes paid by illegal aliens). Each illegal alien or U.S.-born child of illegal aliens costs the U.S. \$8,776 annually. Evidence shows that tax payments by illegal aliens cover only around a sixth of the costs they create at all levels in this country. A large percentage of illegal aliens who work in the underground economy frequently avoid paying any income tax at all. Many illegal aliens actually receive a net cash profit through refundable tax credit programs.</i>	USCIS has determined that this comment falls outside the scope of this information collection based on the criteria published in the Federal Register Notice.

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3.	Commenter: NALEO Educational Fund Commenter ID: USCIS-2024-0003-0012 <i>(Note: The commenter uploaded a letter to regulations.gov at this link USCIS-2024-0003-0012 and provided the commenter's recommendations below as item numbers 3.a.-3.n.)</i>	
3.a.	<i>This is particularly concerning because recipients of USCIS's Citizenship Instruction and Naturalization Application Services grants, whose staff will be asked to respond to these surveys and interviews, already provide very thorough reports that exceed what is typically required in exchange for equivalent or greater support from private sector donors.</i> <i>In addition, the USCIS envisions that survey respondents and interview participants will include LPR participants in grantee recipient programs. Many of them face some of the most significant hurdles to naturalizing, and are among those least likely to have the time and other resources, including secure and reliable on-line connectivity, that the agency is expecting of respondents.</i> <i>...Similarly, although a person with immediate and deep knowledge of the topic and native English ability might complete one of the proposed instruments in the projected time, it is very unlikely that most respondents will. The surveys ask them to recall experiences that are three or more years past, and for individualized reflection and assessment rather than rote recitation of facts. Many prospective respondents were not educated in English and may read and write more slowly than in their native languages.</i>	USCIS will not make changes to this information collection based on this comment. USCIS confirms that no grantee staff or program participant is obligated or compelled to respond to or participate in the survey. As voluntary participants, any respondent may decline to answer any question or discontinue taking the survey or interview. In the same manner, the interviewer can skip questions that are difficult to understand or comprehend. The evaluation contains no new reporting requirements and an organization's and/or individual's decision to participate in the voluntary surveys and interviews will have no impact on any current or future potential grants that organizations have received from USCIS or any pending immigration requests individuals have pending with USCIS.
3.b.	<i>In our organization's experience, providing meaningful and accurate answers to the range of inquiries included in USCIS's proposed survey and interview instruments will frequently require more than the estimated 20 minutes for each survey and 30 for each interview.</i> <i>...Three of the four proposed interviews exceed this length at a glance, and closer inspection reveals that each includes questions with several parts and follow-ups that probe into respondents' answers and will prolong sessions.</i>	The estimated time for completion was pre-tested with program participants and grantees in December 2023 and January 2024. There are several reasons to believe the timeframe stated in the instruments is correct: a) pre-testing generated completion time estimates for the instruments based on experiences of target audience members providing responses; b) if the respondent does not have an answer or cannot recollect the facts, they can skip the survey question or state do not know or do not remember and move on, thus maintaining the average duration of the interviews and surveys as stated in the documentation; and c) seasoned interviewers selected for data collection are trained in languages (Spanish and English) and working with populations with limited English proficiency. These interviewers are also trained to be sensitive to communication and time; they will keep the

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		interview to the allotted time, and if necessary, interviewers will wrap up the interview and code it as "terminated due to time limitations." At all times, seasoned interviewers will focus on not causing more strain on participants. However, USCIS understands there may be language and communication issues due to limited English proficiency, but these issues cannot preclude USCIS from pursuing the information needed for program improvement. The probes are presented to stimulate responses from the interviewee. These questions may never come up, particularly if the interviewee does not recall or does not know the issue for the period in question. USCIS will update the time burden estimates. Surveys will be adjusted to 30 minutes, and interviews will be adjusted to 45 minutes.
3.c.	<i>As noted, program grantees already provide very detailed reports to the agency. Where there is a clear overlap between information already collected from grantee organizations and information sought in the proposed instruments, the burden is not justified and should be reduced, at a minimum, by eliminating duplicative inquiries.</i>	USCIS will not make changes to this information collection based on this comment. USCIS understands that grantees submit quarterly and final reports, and some of the requested information may be available in these documents. However, these fields in the USCIS quarterly reports are not mandatory for submission, so not all grant recipients have provided the requested information. The instruments are needed to complete a sufficient evaluation.
3.d.	<i>USCIS should also eliminate duplicated inquiries in the proposed implementation and outcome-focused instruments.</i>	All information requested has been documented as necessary for analysis in the implementation and outcome of grantees and participant populations. However, in recognition of the feedback and issues raised, USCIS has conducted an additional review of the instruments. USCIS will exclude questions regarding dropouts in the outcome grantee survey (questions 6-9) and rely only on the data gathered in the implementation grantee survey.
3.e.	<i>The following question, for instance, appears on both the implementation and outcome surveys for program staff but seems more properly confined to the latter: "In your opinion, what were the most important factors impacting whether participants completed [CINAS, RAAP, or RAIS] instruction and naturalization assistance services at your organization?"</i>	USCIS will review the outcome survey and, if necessary, clarify the distinction between these instruments. The question on the outcome survey may refocus on factors impacting the naturalization of program participants rather than the program's services. USCIS is considering changes to the grantee surveys (implementation question 9 and outcome questions 5, 9 and 10).

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3.f.	<i>The agency could ensure against duplication and make its evaluations more efficient by combining each implementation- and outcome-focused pair of instruments into a single survey or interview for either program participants or staff.</i>	USCIS will not make changes to this information collection based on this comment. USCIS planned the implementation to be followed by the outcome evaluation to learn from the former findings and be able to incorporate findings into the outcome evaluation. A data collection instrument that integrates both topics eliminates the benefit of the staggered research planned by USCIS.
3.g.	<i>Neither the era defined by the pandemic and lockdowns nor grant periods stretching back four or more years in the past are appropriate to assess program effectiveness.</i>	USCIS will not make changes to this information collection based on this comment. USCIS understands the feedback and concerns raised by the working group. However, due to programmatic, budget and timing constraints, USCIS set the study period as stated. The CIGP evaluation was designed and completed in February 2022. Because grants are implemented over two years, USCIS selected FYs 2018-2021 to access the most complete data on program implementation and completion, as well as naturalization outcomes. Additionally, the evaluation will account for pandemic-related contextual factors.
3.h.	<i>We also can attest from experience that staff changes are likely over several years in nonprofit education and legal assistance work that tends to pay less than other private sector and many public sector options.</i>	USCIS will not make changes to this information collection based on this comment. USCIS recognizes staff turnover in nonprofit organizations could affect the ability of grantees to respond, especially over the extensive study period. The evaluation methods account for imperfect and incomplete data. There may also be issues with recall or knowledge about the issues asked during the years under study. However, the need for information on the factors affecting program implementation and participant outcomes supersedes these potential issues, particularly when grantee reports do not provide a consistent and detailed response to the questions asked in the instruments.
3.i.	<i>We see no indication that surveys or instruments will be available in languages other than English. We are concerned that the apparent lack of interpretation or translation will pose a significant barrier to gathering sufficiently numerous, representative responses from former program participants.</i>	USCIS will not make changes to this information collection based on this comment. As noted above, experienced interviewers help mitigate the potential lack of English proficiency of the respondents. Additionally, surveys will be translated to Spanish, and, where needed, interviews will be conducted in Spanish.
3.j.	<i>Finally, many proposed survey and interview questions do not investigate how grant program requirements support</i>	USCIS welcomes the questions proposed by the working group and will further review their level

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	<i>or hinder grantees as much as they seek information about program qualities independent of USCIS's influence on its grantees and services and activities that USCIS does not require grantees to provide.</i>	and where best to place them in the instrument. USCIS is considering changes to the participant implementation interview (question 5) and grantee outcome interview (question 7) instruments.
<u>3.k.</u>	<i>We are particularly disappointed with the proposed questions about aspects of programs upon which the structure and mechanisms of the Citizenship and Integration Grants program have had little or only indirect influence, such as culturally appropriate engagement and referrals to complementary support services. Some questions ask about features—such as client satisfaction surveys and staff training on equity and inclusion—that USCIS has neither mandated of grantees nor highlighted in any technical assistance offerings.</i>	USCIS will not make changes to this information collection based on this comment. The questions were adapted from widely used cultural competency measures. There is extensive literature on the importance of cultural competency for promoting immigrant and refugee adaptation, integration, and naturalization. The goal of the survey questions and measure, supplemented by interviews, is to identify best practices, gaps, and contexts for the culturally competent practices of grantee organizations that relate to improved participant outreach, engagement, and naturalization outcomes. Since most of the grantees are immigrant and community-based organizations, these organizations are likely to conduct various culturally competent practices already.
<u>3.l.</u>	<i>Questions that merit revision include the following: Ask past program participants how they would like to learn about programs in the future. Since many or most past program participants will be American citizens, the more relevant question would be how they think programs can best reach LPRs eligible for naturalization.</i>	USCIS welcomes suggestions for revision. The suggested revision to the question may better serve grantees in their outreach to potential LPRs seeking naturalization. So, USCIS is considering changes to the participant implementation survey (questions 5 and 6).
<u>3.m.</u>	<i>Questions that merit revision include those that: Ask past program participants about their use of English, use of their native language, and social and recreational engagement in English and native languages.</i>	USCIS will not make changes to this information collection based on this comment. The literature indicates that bicultural engagement is more adaptive for immigrants than assimilation (high acquisition of host culture and low retention of heritage culture) or separation (high retention of heritage culture and low acquisition of host culture.) Greater engagement with host and heritage cultures was reported to be related to higher adaptation, integration, and naturalization. The survey questions were adapted from a validated measure that assesses both cultures' retention or acquisition of language competence, identity, and behaviors. The survey seeks to gather data on bicultural dimensions that affect naturalization. In no instance is the level of engagement in one or the other cultures meant to be presented as a negative integration marker.

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3.n.	<i>Questions that merit revision include those that: Ask program participants to provide sensitive information or recall experiences that may cause fear.</i>	USCIS will not make changes to this information collection based on this comment. Empirical evidence points to the detrimental effect of discrimination on immigrant adaptation, integration, and naturalization. However, there is also evidence of defensive naturalization, in which experiences of discrimination were related to an increase in ethnic community engagement and organizing that promoted naturalization to protect against discrimination. As such, these questions have been carefully selected for inclusion in the survey, and the survey does not request one to describe the details of the negative experiences with discrimination. The results will affect the programmatic and outreach activities to promote naturalization among vulnerable populations and communities.
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