

**SUPPORTING STATEMENT FOR
USCIS Online Account Access
OMB Control No.: 1615-0122
COLLECTION INSTRUMENT(S): G-1614**

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.**

The Government Paperwork Elimination Act (GPEA), Public Law 105-277, 44 U.S.C. 3504 (1998) requires federal agencies to use and accept electronic signatures, where practicable, when conducting official business with the public. In addition, Congress passed the E-Government Act of 2002, [Public Law 107-347](#), 44 U.S.C. §§ 101, 3501, 3541, and 3601 notes (2002), to promote the use of the Internet and emerging technologies within and across Government agencies, provide citizen-centric Government information and services, reduce costs and burdens for businesses and other Government entities, promote access to high quality Government information and services across multiple channels, and transform agency operations by utilizing, where appropriate, best practices from public and private sector organizations.

To help meet the requirements of the GPEA and the E-Government Act, United States Citizenship and Immigration Services (USCIS) has developed certain online systems that enable members of the public to interact with the agency electronically. In order to access these systems, members of the public must create and log into a USCIS Online Account using the myUSCIS portal, previously referred to as the Identity, Credential, and Access Management (ICAM) portal. Various sections of the Immigration and Nationality Act (INA) provide the authority for USCIS to conduct collections of information, and also grant the agency authority to collect the information necessary to establish and log into a USCIS Online Account.

- 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.**

In order to create a new USCIS Online Account, Form G-1614 (formerly OMB-62), members of the public (i.e. users) must submit a valid email address; create an account password; select their preferred method for completing a required two-step verification process, either use of an authentication application, receipt of a text message, or receipt of an email message. Users must also provide responses to five password reset questions of their choice. Only one email address may be used to create an online account. Users may not establish multiple accounts using the same email address; the one email address

associated with any online account must be unique. A user is required to complete a two-step verification process upon creation of a new account and during each subsequent login. USCIS makes use of the information received during the account creation process to set up the user's profile. Once the account is established and the user has logged in, the user can edit or add certain profile information or select a USCIS online system with which to interact.

The myUSCIS system's registrant account is being enhanced to allow companies to set up company administrator accounts with company and personal profiles and to file Form I-129 petitions in addition to H-1B Registrations. The company account will also have functionality that allows a company administrator to invite company members to join a company group and collaborate on H-1B Registrations and Form I-129 petitions. Company members will complete a personal profile. The burden to respondents for creating company and personal profiles, and for creating and accepting/declining invitations to join a company group, is being captured under OMB Control Number 1615-0122. The burden for online filing of H-1B Registrations is covered under OMB Control Number 1615-0144 and the burden for online filing of Form I-129 petitions will be covered under OMB Control Number 1615-0009.

The USCIS systems currently accessible through the USCIS Online Account are: myUSCIS, the FOIA electronic request system (FIRST), and myE-Verify. These systems serve specific, unique purposes and may require the user to provide information beyond what is required to create or log into a USCIS Online Account. USCIS may allow users to access additional online systems through their USCIS Online Account in the future once USCIS adopts an identity-proofing mechanism for verification of an individual's identity when accessing USCIS online services, consistent with the Officer of Management and Budget (OMB) Policy Memorandum M-19-17, www.whitehouse.gov/wp-content/uploads/2019/05/M-19-17, and National Institutes of Science and Technology (NIST) 800-63, www.nist.gov/identity-access-management/nist-special-publication-800-63-digital-identity-guidelines. Each system may be considered a collection of information in its own right and be covered by its own OMB Control Numbers.

- 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.**

Interacting with the USCIS Online Account information collection requires the use of a computer or mobile device such as a smartphone or tablet, as well as access to the Internet. Providing access to certain USCIS online systems is part of USCIS's effort to use information technology to reduce burden on members of the public when interacting with the agency. This information collection also ensures USCIS is complying with the GPEA and the E-Government Act USCIS continues to expand opportunities for the

public to interact with the agency electronically, unless otherwise required by statute or due to the nature of information or documentation being requested by the agency.

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.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 the analysis and studies conducted.

The USCIS myAccount usability study and the continuous internal testing efforts conducted were aimed to enhance the user experience (UX) of the USCIS myAccount web application by integrating human-centric design (HCD) principles. The recent myAccount usability study focused on creating intuitive, user-friendly software solutions through comprehensive user feedback by conducting individual virtual interviews. Participants evaluated various functionalities, including account creation, sign-in, password reset, account security features, and accessing helpful links. Internal testing has also been completed with various team members to vet each design feature collectively; by creating high-fidelity mockups, wireframes, workflows, and internally vetting all designs and concepts. The internal testing efforts, from ideation to testing, covered all aspects of the myAccount modernized solution including subjects such as the Login.gov integration with myAccount, among other concepts. The feedback received was predominantly positive and participants appreciated the intuitive design and user-centric workflow, especially the multi-step account creation process with two-factor authentication. As a result of the feedback collected, the myAccount team provided improvements to the design and made applicable language changes with the review and approval of the Office of Chief Counsel, such as clarifying language in email subject lines within notifications and improving Login.gov functionalities and clarifying language in "Learn more about Login.gov" sections.

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.

Users must provide certain data when interacting with the USCIS Online Account information collection. All data requested as part of this information collection is currently collected only one time, during USCIS Online Account creation. Subsequent account logins require users to only provide the email address and password associated with the account and complete the two-step verification process.

To reduce login burden, USCIS Online Account will optionally allow Login.gov account holders to link their Login.gov account to their USCIS Online Account and use their Login.gov credentials for signing in. Login.gov is a secure sign in service used by the public to sign in to participating government agencies applications and securely access information on their website or application. This platform provides end-users one account for accessibility and simplicity for account management by utilizing the same username and password to access any agency that partners with Login.gov, which streamlines the login process and eliminates the need to remember multiple usernames and passwords. Login.gov provides partnered federal agencies the opportunity to utilize a platform that is secure with the highest standards of security to keep information safe including identity verification and two-factor authentication, provide efficiency for agency costs, and accessibility for the public. Login.gov partners with Federal websites and applications such as Federal jobs (USAJOBS – Office of Personnel Management), Global Entry (Trusted Travelers Programs – Department of Homeland Security), Small business loans and disaster assistance (Small Business Administration) and more.

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.

Certain businesses and other small entities, such as attorneys' offices, will be required to establish a USCIS Online Account through this information collection in order to conduct business with the agency. The information collected to establish a USCIS Online Account and account access requirements are the same for both individuals and businesses.

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.

If this information collection is not conducted, members of the public would not be able to submit electronic certain benefit requests to or receive certain electronic responses from USCIS. This would increase the burden on the public for interactions with the agency.

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.

USCIS is requesting OMB approval of a non-substantive change request to add an option for the public to login to their USCIS Online Account using a Login.gov credential. The minimal updates to the USCIS Online Account do not impact the respondent population or burden estimates. A non-substantive change requests does not require publication of a notice in the Federal Register.

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 provided to the respondents.

The information collected is covered in the associated published system of record notices:

- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), November 27, 2012, 77 FR 70792; and
- DHS/ALL-037 E-Authentication Records System of Records, August 11, 2014, 79 FR 46857.

The associated Privacy Impact Assessments are:

- DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS);
- DHS/USCIS/PIA-030(h) myE-Verify;
- DHS/USCIS/PIA-071 myUSCIS Account Experience;
- DHS/USCIS/PIA-077 FOIA Immigration Records System (FIRST); and
- DHS/USCIS/PIA-xxx USCIS Accounts Public (forthcoming).

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 within 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.

Information Collection Hour Burden Estimate								
		A	B	C = A x B	D	E = C x D	F	G = E x F
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
Individuals or Households	USCIS Online Account Access	4,240,000	1	4,240,000	0.167	708,080	\$43.45*	\$30,766,076
Business or other for-profit	USCIS Online Account Access	1,060,000	1	1,060,000	0.167	177,020	\$60.43**	\$10,697,319
Business or other for-profit	Account Interactions (Profiles, invitations, management)	300,000	1	300,000	0.315	94,500	\$60.43**	\$5,710,635
Total				5,600,000		979,600		\$47,174,030

* 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.

** The above Average Hourly Wage Rate is the [May 2022 Bureau of Labor Statistics](#) average wage for Business and Financial Operations Occupations of \$41.39 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$60.43.

- 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 costs to respondents associated with this collection. Any costs are captured within the OMB Controlled collections that can be electronically filed.

- 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.

Any costs to the Federal Government are captured within the OMB Controlled collections the respondent is using the USCIS Online Account process to access.

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

There are no changes to the estimated annual hour burden or cost burden to respondents.

- 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.