**SUPPORTING STATEMENT**

**Fee Remittance for Certain F, J and M Nonimmigrants**

**ICE Form I-901**

**(OMB No.** **1653-0034)**

1. **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.**

On March 1, 2003, the former Immigration and Naturalization Service (INS) transferred duties from the Department of Justice (DOJ) to the Department of Homeland Security (DHS), pursuant to the Homeland Security Act of 2002 (HSA), Public Law 107-296, 116 Stat. 2135 (Nov. 25, 2002). The adjudication functions of INS transferred to U.S. Citizenship and Immigration Services (USCIS), and the Student and Exchange Visitor Information System (SEVIS) function transferred to the Bureau of Border Security, now U.S. Immigration and Customs Enforcement (ICE). For the sake of simplicity, any reference to the INS has been changed to DHS, even when referencing events that proceeded March 1, 2003.

The Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Public Law 104-208, Subtitle D, Section 641 directs the Attorney General, in consultation with the Secretary of State and the Secretary of Education, to develop and conduct a program to collect information on academic nonimmigrant students (F-1), vocational nonimmigrant students (M-1), and exchange visitors (J-1), as well as their dependents (F-2, M-2 or J-2), from approved institutions of higher education, as defined in section 101(a) of the Higher Education Act of 1965, as amended, or in a program of study at any other DHS-approved academic or language-training institution, to include approved private elementary and secondary schools and public secondary schools, and from approved exchange visitor program sponsors designated by the Department of State (DOS). It also authorized a fee at a rate established in the final rule published September 26, 2008, at 73 FR 55683, to be collected from these F, J and M nonimmigrants to support this information collection program.

DHS implemented the Student and Exchange Visitor Program (SEVP) to oversee and manage the database, SEVIS, to carry out this statutory requirement. The substantive requirements and procedures for SEVIS have been promulgated in separate rulemaking proceedings. See 67 FR 34862 (May 16, 2002) (proposed rule implementing SEVIS); 67 FR 44343 (July 1, 2002) (interim rule for schools to apply for preliminary enrollment in SEVIS); 67 FR 60107 (Sept. 25, 2002) (interim rule for certification of schools applying for enrollment in SEVIS); 67 FR 76256 (Dec. 11, 2002) (DHS final rule implementing SEVIS); 67 FR 76307 (Dec. 12, 2002) (DOS interim rule implementing SEVIS). On December 21, 1999, the publication of a Federal Register document at 64 FR 71323 proposed to amend 8 CFR 103.7; 214.2(f), (j), and (m); and 8 CFR 299.1 to provide for this fee as required in the law.

Section 641(e) of IIRIRA, as amended, 8 U.S.C. 1372(e), directs that this information collection system be self-funded by the academic nonimmigrant students (F-1), vocational nonimmigrant students (M-1), and exchange visitors (J-1) it benefits. These nonimmigrants must pay the fee before the DOS considers granting them F, J, or M nonimmigrant visa status.

**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.**

This information collection is necessary to implement section 641 of IIRIRA, 8 U.S.C. section1372, which directs DHS to collect information relating to academic nonimmigrant students (F-1), vocational nonimmigrant students (M-1), and exchange visitors (J-1), as well as their dependents (F-2, M-2, or J-2)[[1]](#footnote-3), and provides for the collection of the required fee to defray the costs of this program. Section 641 of IIRIRA requires DHS to collect current information, on an ongoing basis, from schools and exchange visitor program sponsors relating to F, J, and M nonimmigrants during their stay in the United States, using electronic reporting technology to the fullest extent practicable. SEVP implemented SEVIS to carry out this statutory requirement. SEVP uses the Form I-901, Fee Remittance for Certain F, J and M Nonimmigrants, to provide a receipt to the F, J, or M nonimmigrant upon payment and to positively identify that a particular F, J, or M nonimmigrant has paid the fee.

**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 to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.**

The use of the Form I-901 provides the most efficient means for collecting and processing the required data. SEVP employs information technology in collecting and processing this information using the [FMJ Fee](https://www.fmjfee.com/) website at <https://www.fmjfee.com>. The FMJ Fee site is part of the ICE.gov website that allows F, M, and J visa nonimmigrants to pay the required fees. Currently, approximately 99 percent of the academic nonimmigrant students (F-1), vocational nonimmigrant students (M-1), and exchange visitors (J-1) complete their Forms I-901 electronically via the [FMJ Fee](https://www.fmjfee.com/) site. However, SEVP continues to accept paper submission of the Form I-901 from the approximately one percent of the F, J, and M nonimmigrant population that still requires an alternative to electronic submission.[[2]](#footnote-4) SEVP may, in the future, consider eliminating paper submissions.

**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.**

The information supplied can be obtained from an existing information system, SEVIS. A designated school official enters a nonimmigrant student’s personal and school information on the Form I-20 (Certificate of Eligibility for Nonimmigrant Student Status) within SEVIS and subsequently issues a completed Form I-20 to the nonimmigrant student when they are granted acceptance to the school. Similarly, a responsible officer enters an exchange visitor’s personal and sponsor information on the Form DS-2019 (Certificate of Eligibility for Exchange Visitor Status) within SEVIS and subsequently issues a completed Form DS-2019 to the exchange visitor upon their acceptance to the program.

The Form I-901 electronic system supported by the Department of the Treasury and used by SEVP, Financial Management Service (FMS), aggregates fee data from the Internet, along with other potential electronic payment systems and the manual paper-based payment system (“lockbox”), but is a separate system from SEVIS, which is used to manage the Forms I-20 and DS-2019 and most other nonimmigrant student and SEVP-certified school processes.

However, the Form I-901 requires a nonimmigrant student’s valid SEVIS identification number, as well as some basic biographical information gathered in SEVIS through the Form I-20 or Form DS-2019. SEVP established a data interface in which the Form I-901 system provides SEVIS with payment information. SEVP also integrated such payment information from SEVIS into the existing data share arrangement providing Forms I-20 and DS-2019 data to U.S. consulates for use during the visa screening process. The Form I-901 fee must be paid prior to the issuance of a nonimmigrant F, J, or M visa or a change of nonimmigrant classification. The ability to locate and match records to confirm payment of the fee is critical, because the failure to pay the fee will result in the denial of visa issuance or in a violation of status. As such, this data matching enables SEVP and DOS to credit the nonimmigrant student or exchange visitor with payment of the required fee.

While academic nonimmigrant students (F-1), vocational nonimmigrant students (M-1), or exchange visitors (J-1) must provide a minimum amount of Form I-20 or DS-2019 information on the Form I-901, the repeated information is minimal. The use of the information benefits the F, J, or M nonimmigrant by ensuring that each is properly credited with having paid the Form I-901 fee to maintain status as an F, J, or M nonimmigrant.

The Form I-901 requests credit card and bank account information from those paying the fee online at [FMJ Fee](https://www.fmjfee.com/). SEVP provides this electronic submission option to provide as many F, J, or M nonimmigrants as possible an easy means to pay the fee. Banks require the information on the Form I-901 to process the F, J, or M nonimmigrant’s payment. This credit card and bank account information is not stored in the SEVIS database or retained by the FMS system beyond the time it takes to approve and complete the transaction. The Internet site has been implemented in partnership with the Department of the Treasury and developed with appropriate security measures in place to safeguard the applicant’s information.

The nonimmigrant prints a receipt to provide a physical backup to the I-901 SEVIS Fee Payment Information in SEVIS for possible use during the consular interview. This facilitates confirmation that the I-901 fee was paid. Three of the data elements that were once printed on these receipts to validate the student’s identity are now redundant. SEVP no longer collects the following data elements: Gender, City (Province) of Birth, and Passport Number. SEVP continues to collect: Surname/Primary Name (Last Name), Given Name (First and Middle Name), Street Address, City/Province, State (U.S. Address Only), Country, Zip Code/Postal Code, Date of Birth, Country of Birth, Country of Citizenship, Email Address, School Code (F/M nonimmigrant only) or Program Number (J-1 nonimmigrant only), and SEVIS Identification Number.

When the SEVP I-901 processing team encounters an error or omission on the Form I-901 submission, it is imperative that the processing team communicates with the nonimmigrant student or exchange visitor in a timely manner to correct the information and successfully process the I-901 fee before the nonimmigrant student or exchange visitor arrives at a consulate interview, as proof of Form I-901 payment is necessary at the visa screening process.

SEVP’s Form I-901 processing staff used to contact the nonimmigrant student or exchange visitor via a letter sent through the traditional international postal systems, a process that took up to 60 days. To shorten this response time, SEVP now also collects the Form I-901 applicant’s email address. Communication to Form I-901 applicants via email reduces the error correction window from 60 days to approximately 14 days and saves the Form I-901 processing staff the hours and printing costs associated with establishing contact through traditional mail.

**5. If the collection of information impacts small businesses or other small entities disproportionately (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

This information collection does not disproportionately impact small businesses or other small entities. Only F, M, and J nonimmigrant students complete the Form I-901.

**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 the information is not collected, SEVP cannot allow the academic nonimmigrant students (F-1), vocational nonimmigrant students (M-1), or exchange visitors (J-1) to complete payment of the Form I-901 fee. In addition, SEVP will be unable to positively identify those F, J, and M nonimmigrants who have paid the fee. Therefore, SEVP’s ability to ensure compliance with the law and enforce fee collection will be severely limited without this information.

If the email address information is not collected, the payment process is significantly delayed.

**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.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

**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 June 2, 2025, ICE published a 60-day notice in the Federal Register at 90 FR 23350. ICE received no substantive comments. On June 31, 2025 ICE submitted the 30-day notice for publication in the Federal Register.

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

SEVP does not provide payment or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

As the system of record, SEVIS covers the use and potential sharing of information in this collection. SEVIS is covered by the Privacy Act. ICE published notice of this system of records in the Federal Register on January 5, 2010, at 75 FR 412. The SEVIS Privacy Impact Assessment covers the use and potential sharing of information in this collection. ICE published notice of this Privacy Impact Assessment on June 23, 2011; see <http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_sevis_update_nctc.pdf>.

**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 person’s 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.**

Annual Reporting Burden:

1. Number of Estimated Respondents per year per fee type

F-1 and M-1 @ $350 585,608[[3]](#footnote-5)

J-1 Full @ $220 137,084[[4]](#footnote-6)

J-1 Partial @ $35 179,894[[5]](#footnote-7)

1. Number of Responses per each Respondent 1
2. Total Annual Responses 902,586[[6]](#footnote-8)
3. Hours per Response 0.216 hours (13 minutes)
4. Total Annual Reporting Burden 194,959 hours[[7]](#footnote-9)

SEVP bases the number of application type respondents on the average of FY2024 and FY2023 Form I-901 payment data obtained from the I-901 system. SEVP derived the projected hours per response for this collection of information by breaking the process into three basic components:

 Learning about the Law and the Form 4 Minutes

 Completion of the Form 5 Minutes

 Assembling and Filing the Form 4 Minutes

 TOTAL Hours per Response 0.216 hours (13 minutes)

For all components, SEVP used staff not conversant with immigration processes to determine average completion times.

**Annual Reporting Burden**

**Total annual reporting burden hours are 194,959.** SEVP derived this figure by multiplying the number of respondents (902,586) x frequency of response (1) x 0.216 hours (13 minutes) per response.

**Annual Cost Burden**

The estimated annual cost burden is $3,117,394. This estimate is based on the number of respondents (902,586) x number of responses (1) x hours per response (0.216 hours) x hourly loaded federal minimum wage ($15.99).

SEVP bases the number of respondents on the average of FY2023 and FY2024 I-901 payment data by application type from the I-901 system.

The hourly wage rate for an F-1 or M-1 student is represented by the national average of state minimum wage rates[[8]](#footnote-10), $11.02, estimated from the Consolidated Minimum Wage Table, January 1, 2025, https://www.dol.gov/agencies/whd/minimum-wage/state. The loaded wage rate for students was calculated by dividing the average minimum wage by 68.9 percent, the ratio of reported wages and salaries to total compensation. This percentage was reported in the September 2024 BLS table on Employer Costs for Employee Compensation: Civilian workers, by major occupational and industry group, All workers, https://www.bls.gov/news.release/ecec.t01.htm. The fully loaded wage rate for F-1 and M-1 students was calculated as $15.99 ($11.02/0.689).

**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 collection. However, there is a fee charge of $350, $220 or $35 associated with the collection of this information. The breakdown is as follows:

1. Annualized Fee Revenue Estimate (FY 2025) $ 241,417,552

585,608 F-1 and M-1 @ $350 $ 204,962,800

137,084 J-1 @ $220 $ 30,158,480

179,894 J-1 @ $35 $ 6,296,273

SEVP based these calculations on the following: a $350 fee charge for F-1 and M-1 nonimmigrant students; a $220 fee charge for J-1 exchange visitors; and a reduced fee of $35 for those J-1 exchange visitors sponsored by Au Pair programs, summer/work/travel programs, and camp counselor programs.

This fee is not applicable to those J-1 nonimmigrants who are participating in a program sponsored by the Federal government. The section of IIRIRA mandating the SEVIS fee, IIRIRA section 641, provides that an alien seeking J-1 status to participate in an exchange visitor program that is sponsored by the Federal government is exempt from paying a fee. Accordingly, J-1 exchange visitors exempt from the fee as participants in a Federal government-sponsored exchange visitor program are those participating in an exchange visitor program with a program identification designator prefix of G-1, G-2, G-3, or G-7.

**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:**

1. Software Development, System Management and Collection and Processing Costs listed below.

Table: Fee Rule – Adjusting Fees for the Student and Exchange Visitor Program. Detailed Bi-annual Cost Breakdown (FY 23 + FY 24, Dollars in Thousands)

| **Process** | **Activity** | **I-901** |
| --- | --- | --- |
| Enforce Compliance with Regulations and Laws | A-28: Conduct Student and Exchange Visitor (I-901) investigations |  $87,016  |
| A-29: Conduct school and sponsor investigations |  $32,144  |
| A-30: Operate CTCEU programs |  $3,867  |
| A-31: Provide CTCEU liaison support |  $528  |
| A-41: Perform I-515 operations duties |  $1,860  |
| A-43: PDSO/DSO background checks |  $644  |
| Formulate Policy | A-16: Analyze and develop policy |  $2,478  |
| A-17: Develop and review rules and regulations |  $2,019  |
| A-18: Implement policy |  $1,146  |
| A-19: Develop future policy strategy |  $704  |
| Provide Stakeholder Communications | A-11: Develop and deliver SEVP communications |  $6,449  |
| A-12: Respond to stakeholders' policy and technical inquiries (including Tier III Help Desk) |  $7,908  |
| A-13: Provide Field Representative support |  $13,068  |
| A-14: Prepare and attend conferences/workshops related to the SEVIS community |  $2,647  |
| A-15: Develop and conduct strategic communications |  $1,725  |
| Provide Systems Program Management Support | A-20: Modify and enhance functionality of SEVP mission systems ( e.g., SEVIS, SEVPAMS  10 ) |  $27,239  |
| A-21: Operate and maintain SEVP mission systems ( e.g., SEVIS, SEVPAMS) |  $29,864  |
| A-22: Provide Tier I and Tier II Help Desk support |  $12,289  |
| A-23: Conduct systems program management |  $4,703  |
| A-24: Analyze and disseminate program data |  $3,624  |
| A-25: Operate and maintain SEVP inter-office systems |  $1,475  |
| Support SEVP Operations | A-26: Maintain SEVP systems security |  $1,685  |
| A-27: Maintain SEVP physical security |  $176  |
| A-32: Provide Executive Leadership for SEVP |  $2,215  |
| A-33: Provide SEVP administrative support |  $1,446  |
| A-34: Develop strategic plan |  $3,128  |
| A-35: Manage financial resources |  $5,975  |
| A-36: Manage procurement |  $5,580  |
| A-37: Manage personnel resources |  $2,214  |
| A-38: Manage SEVP records |  $9,918  |
| A-39: Manage facility resources |  $2,908  |
| A-40: Manage I-901 payment system |  $5,814  |
| A-42: Manage I-901 J program |  $16,196  |
| A-44: Site Visits |  |
| A-46: Monitor nonimmigrant student compliance |  |
| Train SEVP staff, other staff, and DSOs | A-09: Develop and deliver SEVIS training |  $11,147  |
| A-10: Develop and deliver internal training |  $1,950  |
| Total |  |  $313,749  |

# Government Cost

**The estimated bi-annual inclusive cost to the government is $313,749; the average annualized, inclusive cost is $156,874.50.** SEVP based its estimate of operational costs for the Form I-901, which is accessed via the Internet at [FMJ Fee](https://www.fmjfee.com/), on FY 2023 and 2024 costs. These include the costs of enforcing compliance with regulations and laws, formulating policy, providing stakeholder communications, providing systems program management support, supporting SEVP operations, and training SEVP staff, other staff and DSOs. A full breakdown of operational costs related to the administration of Form I-901 is included in the Table above.

**15. Explain the reasons for any program changes or adjustments reporting in Items 12, 13, or 14 of the OMB Form 83-I.**

The number of responses increased from the previous analysis, mainly due to the end of the COVID-19 pandemic, and student numbers increasing post pandemic.

**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.**

SEVP does not intend to employ the use of statistics or the publication thereof for this information collection.

**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.**

SEVP does not seek an exception. SEVP shows the OMB collection number and approval expiration date on the front page of the FMJfee.com site.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.**

SEVP does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods.**

Not applicable.

1. Dependents are not required to pay a fee. The cost of their participation is incorporated in the payment of their F-1, M-1, or J-1 principal. [↑](#footnote-ref-3)
2. All percent calculations are rounded to the nearest number. [↑](#footnote-ref-4)
3. Calculation: FY 2023 thru FY 2024 as follows, 591,328 + 579,888 = 1,171,216 / 2 = 585,608. [↑](#footnote-ref-5)
4. Calculation: FY 2023 thru FY 2024 as follows, 136,175 + 137,993 = 274,168 / 2 = 137,084. [↑](#footnote-ref-6)
5. Calculation: FY 2023 thru FY 2024 as follows, 181,224 + 178,563 = 359,787 / 2 = 179,894. [↑](#footnote-ref-7)
6. Calculation: Total Annual Responses 585,608 + 137,084 + 179,894 = 902,586.

Note: SEVIS by the Numbers data, posted on the Outreach page of the SEVP website, reflects a limited period of the year (a “snapshot” of that segment) rather than the entire fiscal year, as given in this statement. [↑](#footnote-ref-8)
7. Calculation: Total Annual Responses 902,586 x 0.216 hours = 194,959 hours. [↑](#footnote-ref-9)
8. Averaged across 50 states and Washington D.C., Puerto Rico, U.S. Virgin Islands, and Guam. [↑](#footnote-ref-10)