

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Affidavit of Relationship

**OMB Number 1405-0206
DS-7656**

A. JUSTIFICATION

1. Why is this collection necessary and what are the legal statutes that allow this?

The Department of State's Bureau of Population, Refugees and Migration (PRM) manages the U.S. Refugee Admissions Program (USRAP). PRM coordinates with the Department of Homeland Security's U.S. Citizenship and Immigration Services (DHS/USCIS), the Department of Health and Human Services' Office of Refugee Resettlement (HHS/ORR), and other relevant U.S. government agencies in carrying out this responsibility.

Section 207(a)(3) of the Immigration and Nationality Act (INA) states that refugee admissions "shall be allocated among refugees of special humanitarian concern to the United States in accordance with a determination made by the President after appropriate consultation." The Presidential Determination on Refugee Admissions for Fiscal Year 2024 provided for the admission of refugees who gain access to the USRAP through the "Priority 3" process. As described in the Report to Congress on Proposed Refugee Admissions for Fiscal Year 2024, submitted by the Secretary of State on behalf of the President, there are currently four "priorities," or categories of cases, that have access to the USRAP. Priority-3 (P-3) is for individual cases of designated nationalities granted access for purposes of reunification with family members already in the United States.

In order to access the USRAP through P-3, an applicant must have a Form DS-7656 Affidavit of Relationship (AOR) filed on his or her behalf by an eligible U.S.-based family member in the United States (the respondent). An eligible U.S.-based family member must be at least 18 years of age and a lawful permanent resident or U.S. citizen who was initially admitted as a refugee, Afghan or Iraqi Special Immigrant Visa (SIV) recipient, or asylee no more than five years before filing the AOR.

The respondent may file an AOR on behalf of his or her spouse, unmarried children under 21, and/or parents. The information the respondent furnishes in the AOR is essential to determining qualification for P-3 access to the USRAP. The AOR also informs the respondent that DNA evidence of all claimed parent-child relationships between the respondent and parents and/or unmarried children under 21 may be required as a condition of P-3 access to the USRAP; it further informs the U.S. Government will pay for the cost of any DNA testing for the respondent and their biological parents and children. However, if further DNA testing is needed following the USCIS interview, the U.S. tie, Qualifying Family Member(s) and their derivative beneficiaries will be responsible for payment.

DHS/USCIS is responsible for determining who is eligible for admission to the United States as a refugee. DHS/USCIS use the information listed in the AOR to confirm and verify information related to the family members overseas seeking refugee resettlement as well as subsequent applications or petitions for other immigration benefits that they may seek under U.S. law. The AOR therefore serves as an important tool to combat fraud in such adjudications and programs.

2. *What business purpose is the information gathered going to be used for?*

A respondent in the United States completes the AOR to: (a) establish that he or she was admitted to the United States as a refugee or granted asylum; (b) provide a list of qualifying family members (spouse, unmarried children under 21, and parents) who may wish to apply for refugee resettlement to the United States; and (c) establish that the family members are nationals of qualifying countries under the P-3 program.

The respondent completes an AOR at a local office of a Resettlement Agency (RA) that has a cooperative agreement with the Department of State to assist refugees who have been resettled in the United States. The RA uploads the completed AOR to a data sharing site belonging to the Refugee Processing Center (RPC), a Department of State-contracted facility, for case creation and processing. Next, the appropriate overseas Resettlement Support Center (RSC), working under a different cooperative agreement with the Department of State, initiates refugee applicant processing and conducts case pre-screening.

After pre-screening, the RSC contacts the respondent with instructions for arranging DNA relationship testing, to verify all claimed biological relationships as described above. The respondent selects a U.S. laboratory approved by the American Association of Blood Banks (AABB) to conduct DNA relationship testing. The selected laboratory sends DNA collection kits to the RSC. A designated panel physician collects DNA samples via buccal swab from relevant applicants, then returns the samples to the U.S. laboratory.

The laboratory sends test results to the RPC, which records in its case-management system whether each claimed biological relationship was confirmed or not confirmed and redacts the laboratory report so as not to retain any specific information about the matching of alleles between the relatives. Then, the DHS/USCIS Refugee Access Verification Unit (RAVU) confirms that the information furnished in the AOR is consistent with information that the respondent previously provided. If the refugee applicants are eligible for continued processing, the RSC will present their cases to DHS/USCIS for adjudication.

The U.S. laboratory that conducted the testing will retain the DNA sample according to its own policies, usually for six months, and will also retain a copy of the test result in the event that results are contested. The Department of State does not retain a DNA sample.

The Privacy Impact Assessment (PIA) for this collection is posted on the Department of State website at <https://www.state.gov/privacy-impact-assessments-privacy-office/>.

3. *Is this collection able to be completed electronically (e.g. through a website or application)?*

The respondent works closely with a local office of an RA to ensure that the information furnished for the AOR is accurate. The RA local office often is the same organization that helped resettle the respondent as a refugee in the United States and is therefore familiar with his or her case. (Individuals who were granted asylum in the United States may visit any resettlement agency to complete an AOR.) Respondents who do not have strong English-language skills benefit from a face-to-face meeting with RA staff.

This collection currently makes partial use of electronic techniques. The collection instrument, Form DS-7656, is available electronically, is completed electronically, and is submitted electronically to the RPC, where the data it is then manually uploaded into the USRAP case management system. The DS-7656 is available to RAs on START Knowledge for download and is not available to the public. In addition, the RA prints a copy for the respondent's ink signature, then keeps a copy at its headquarters.

4. *Does this collection duplicate any other collection of information?*

Some of the information collected may have been collected when the U.S. tie was a refugee or asylee. However, a majority of the information necessary for the processing of family members under the P-3 program is not available elsewhere.

5. *Describe any impacts on small business.*

This information collection does not impact small businesses or other small entities.

6. *What are consequences if this collection is not done?*

Without this collection, the United States would lack the necessary information to verify claimed family relationships between the eligible U.S.-based family member and refugee applicants overseas. Without this information the United States would be unable to accomplish its stated policy of resettling qualifying family members of refugees and asylees in the United States through P-3 access to the USRAP.

7. *Are there any special collection circumstances?*

No.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

The Department received the following public comments during the 60-day solicitation period, included along with adjudications below.

1. **Clear Inclusion of Legal Permanent Residents (LPRs) and U.S. Citizens in Instructions, and Clarification of the Five-Year Limitation:**

- a. **Item 2. Who may file this form?:** While LPRs and U.S. citizens can file the P3 AOR Form and select their status on the form, they are not mentioned in the filing instructions. To avoid confusion, the instructions should clearly list them under 'Who may file this form?'

Adjudication: No Action. This list refers not to the current status of the filer, but the status they were originally granted. Therefore, it does not make sense to include LPR or U.S. Citizen in this context.

- b. **Item 2. Who may file this form?** The form states that applicants must have been in the U.S. for no more than five years before filing. This should explicitly refer to five years from the granting of status (e.g., asylee, refugee, or SIV), as this date may differ from arrival in the U.S.

Adjudication: Agree. Will update the language accordingly.

2. **Clarification on Eligibility Requirements and Terminology: The current wording in the following areas of the DS-7656 form, regarding eligibility can be misleading and should be revised for accuracy and inclusivity:**

- a. **Item 3. Who can apply for refugee admission based on this form?:** This item states, "The following family members may be qualified to apply for refugee admission to the United States under the USRAP, if they have valid proof of refugee registration in their country of asylum," this wording is misleading. It implies that applicants must be registered as refugees in their host country, which is not accurate. Acceptable proof of registration (POR) documents can also include those held by asylum seekers or residents. To improve clarity and inclusiveness, the wording should be revised to specify "proof of registration," instead of "proof of refugee registration" acknowledging the diverse status of individuals who may qualify for refugee admission under the USRAP.

Adjudication: Agree. Will update the language accordingly.

- b. **Item 3. Who can apply for refugee admission based on this form?:** Include on the DS-7656 form terminology of the requirement that all beneficiaries must be located outside their country of origin. This will help clarify eligibility, otherwise US Based Family Members may anticipate their family can apply if still in country of origin.

Adjudication: No Action. Not always true, as highlighted below, and do not want to list specific exceptions given that these shift over time.

- c. **Item 3. Who can apply for refugee admission based on this form?:** The following exceptions should also be clearly listed in the DS-7656 form:
- El Salvador, Guatemala, and Honduras: Beneficiaries can be inside or outside their country of origin. **Also, terminology in the form that Proof of Presence is required for these individuals.**
 - Iraqi SIV Recipients: Family members of Iraqi SIV recipients can also be inside or outside their country of origin.

Adjudication: No Action. Do not recommend listing specific countries on the form, as these can shift as policy changes.

- d. **Item 5. What additional information must be provided with this form?:** To enhance further clarity and align with the rule that "all beneficiaries must be located outside their country of origin and be registered with UNHCR or legally reside in the host country," it is recommended to revise this language in Item 5. Specifically, the phrase "*country of asylum*" should be removed and replaced with "host country." This would ensure that the requirement for valid proof of registration is clearly defined, reflecting the diverse circumstances of applicants.

Adjudication: No Action. This line is specifically in the context of proof of registration documentation, which only makes sense for a country of asylum. If the beneficiary is in their home country, serving as their "host country", then there would be no proof of registration from that country.

3. Clarifying Eligibility and Required Documentation:

Item 5 What additional information must be provided with this form?: In item 5, regarding acceptable proof of current legal immigration status. Since Lawful Permanent Resident (LPR) status must derive from refugee, asylee, or Special Immigrant Visa (SIV) recipient status for eligibility under this form, listing LPRs as a separate category creates confusion. Individuals who adjusted their status through other means may incorrectly assume they are eligible based solely on their LPR status. To prevent misinterpretation, the form should specify that both LPRs and U.S. citizens must have derived their status from refugee, asylee, or SIV, in line with Item 2 eligibility criteria: This can be stated as follows:

Applicants must submit proof of current legal immigration status:

Refugees, SIV Recipients, and Asylees:

- Legible copy of Form I-94 (single-sided or both sides, as applicable)
- U.S. Customs and Border Protection-endorsed visa
- Asylum grant letter or immigration judge's grant decision
- Legible copy of both sides of your Form I-554 (permanent Resident card- green card)
- Any proof of permanent resident status issued by USICS or document that were formerly issued by the immigration and Naturalization Service.
- Legible copy of U.S. passport or naturalization certificate (Note: Copies are allowed for immigration purposes.)

Adjudication: No Action. Item 2 clarifies who may file the form, and the list is sufficient in its current state.

4. Retaining "Type B" Classification for Qualifying Family Members (QFMs)

Item 3. Who can apply for refugee admission based on this form?: Requiring all QFMs to be listed in Section II, even if they could also qualify as "Type B" relatives, imposes an unnecessary burden on applicants. This approach necessitates additional steps and documentation for individuals.

- o The new DS-7656 instructions require all eligible family members to be listed as Qualifying Family Members (QFMs), even if they also meet the criteria for "Type

B" status. This change removes the benefit of Type B classification, which traditionally allows family members to derive refugee status from the QFM without needing to independently establish a claim of persecution.

- o By forcing all beneficiaries that are eligible as QFMs, to be listed only under QFM status, places unnecessary burdens on applicants. Potentially increasing the risk of case complications, delays, or denials, especially for spouses and unmarried children under 21 who might otherwise benefit from the derivative status provided to "Type B" relatives. This instruction takes away a critical benefit by limiting the availability of Type B classification, which could jeopardize family reunification and undermine the humanitarian goals of the refugee program. Expanding access to Type B classification would ensure that more family members can benefit from streamlined processing and derivative status.
 - *For example: If a Spouse is listed as QFM with 3 children (USTs children) then the Spouse and children all need to be listed as QFMs. Requiring documentation as QFMs, and the 3 children to independently establish their refugee claim.*

Adjudication: No Action. There is no increase in documentation requirements as a result of this change. Documentation requirements to prove relationships apply to both QFMs and Type B relatives. Additionally, RSCs will continue to create cases based on USCIS case composition guidelines, such that minor children would still derive their refugee claim from a parent. Listing a child as a QFM on the AOR form, instead of a Type B relative, does not change that policy in any way.

5. Comprehensive Reevaluation of Supporting Document Requests:

Item 5 What additional information must be provided with this form?: The current P3 AOR instructions do not require the additional supporting documents to prove UST relationship to QFM beneficiaries. Currently only Proof of Status & Proof of Registration are required at the initial submission. Giving applicants time to correct any misspellings or discrepancies in names or date of births. However, the new instructions now mandate all supporting documents upfront, which is excessive and burdensome.

While marriage and birth certificates are essential, requiring evidence of previous marriage terminations and legal name changes at the outset is impractical and time-consuming. Additionally, requesting birth certificates to prove spousal relationships can be unnecessarily complex, and marriage certificates alone should suffice.

Some applicants may require additional time to obtain missing documents or rectify common errors, such as discrepancies in names or dates of birth. Requesting documents at a later time, rather than at the initial submission, would provide applicants with ample time to secure the necessary documentation from the appropriate authorities while still ensuring their applications are submitted within the five-year eligibility deadline for filing. Mandating the submission of all documents at the initial stage jeopardizes this timeline and could hinder applicants' chances of successfully filing their cases.

Either removing the requirement of proving USBFMs relationship to QFM, or allowing document submission at a later stage would streamline the process and help avoid

unnecessary delays. Requesting additional documentation only when necessary, would ultimately create a more efficient and applicant-friendly experience.

Adjudication: No Action. *The form clarifies what documentation is acceptable but is not increasing the level of documentation that is required. Requesting available documentation as part of the initial submission is intentional to avoid delays later on in the process.*

6. Practical Documentation Standards for Parent-Child Relationships:

- a. **Item 5 *What additional information must be provided with this form?***: The current requirements for proving the relationship between a parent and their biological child are impractical, especially for fathers. Many applicants live in refugee camps or unstable environments, where gathering extensive documentation is difficult or even impossible.

While it may be feasible to request a birth certificate listing the mother's name (for most countries but not for all), the additional documentation required for fathers—such as marriage certificates, proof of legal termination of previous marriages, or legitimation by civil authorities—is burdensome. Access to government services or legal records is often limited or unavailable, making these requirements unrealistic.

Moreover, the request for detailed evidence of a bona fide parent-child relationship—such as money orders, tax returns, insurance records, or correspondence—assumes access to resources and systems unavailable in many refugee camps. It is unreasonable to expect applicants to produce such documentation under these conditions, and it risks unfairly penalizing those with genuine familial relationships who lack formal evidence.

Furthermore, fathers who want to apply for their children born out of wedlock may face additional challenges. In refugee camps, marriages may not be legally recognized for filing a P3 AOR application, often referred to as "camp marriages." As a result, even if a father considers himself married, the relationship may be classified as out of wedlock. This forces him to provide extra evidence of a bona fide parent-child relationship, as though he were never married. This burdensome requirement could unfairly prevent fathers from reuniting with their children despite having a genuine relationship with them.

For efficiency and fairness, it is recommended that the requirement for marriage certificates and financial documentation be reconsidered. Either removing the requirement of proving USBFMs relationship to QFM, or accepting a birth certificate with the father's name listed as sufficient proof of relationship would align better with the realities of refugee populations. This approach would reduce unnecessary barriers, prevent delays, and ensure applicants are not disadvantaged by circumstances beyond their control.

Adjudication: No Action. This section is outlining acceptable documentation and recognizes it may not be available in all cases.

7. **Addressing the Realities of Secondary Evidence:**

- **Item 5 What additional information must be provided with this form?:** this area also outlines secondary evidence options for cases where primary documents, such as birth or marriage certificates, are unavailable. However, these alternatives often impose unrealistic expectations on individuals living in refugee camps or other unstable environments:
 - I. **Religious Institution Record:** This requirement seeks a certificate from a religious institution documenting a ceremony, such as baptism, that occurred within two months of birth. However, many refugees flee their home countries suddenly, often without any documentation, making it unlikely that they would have sought or received religious ceremonies within such a narrow timeframe. Furthermore, the conditions in refugee camps rarely support organized religious record-keeping. Baptism records or similar documents are specific to certain faiths, which restricts access for individuals of different religions or belief systems. This requirement lacks inclusivity, as many children are not baptized or do not undergo comparable religious rites, particularly within two months of birth. Additionally, even when these records exist, they are often subject to errors, such as misspellings or incorrect dates, because they were not originally issued with formal verification in mind. Retrieving such documents can be challenging, as religious institutions in refugee settings may lack reliable record-keeping practices
 - II. **School Record:** This option requires a letter from the school authorities with birth information and parent names. Refugee children might have limited access to formal education, and even if they do attend schools within the camp, these schools might not keep detailed records due to resource constraints or displacement. Enrollment in schools may be delayed due to conflict, displacement, or other challenges, meaning that reliable documentation may not be available. Even if school records exist, they may contain errors due to inconsistent administrative practices in refugee camps or host countries. Frequent relocation of families can also make it difficult to access older school records.
 - III. **Census Record:** Census data collection is a complex process requiring significant infrastructure and resources, and unlikely to be available in all countries.

In conclusion, while these secondary evidence options are intended to be helpful, they often present significant challenges for refugees who lack stable living conditions and access to formal institutions. Refugees who live in host countries often lack formal registration with the local authorities, making it unlikely that their information is included in census records. In cases where census records exist, they may contain

outdated or incorrect information, such as name or date of birth discrepancies, complicating their use as reliable evidence.

Adjudication: No Action. *This section is outlining acceptable secondary evidence and recognizes it may not be available in all cases.*

8. Clarifying Documentation Requirements for Type B Relatives:

- **Item 5 What additional information must be provided with this form?:** The AOR form provides instructions and acceptable documentation examples for proving familial relationships between a U.S.-based family member and Qualifying Family Members (QFMs). However, the form lacks clarity on whether these requirements and standards of proof extend to Type B relatives.

The AOR form does not clarify whether the requirements for proof of relationship apply to both Qualifying Family Members and Type B Relatives, or just Qualifying Family Members.

- I. Item 3 of the form defines QFMs as spouses, unmarried children under 21, and parents of the U.S.-based family member. It further explains that Type B relatives are the spouse and unmarried children under 21 of the QFM.
- II. Item 5 outlines the required documentation for establishing a relationship, including specific examples for spouses, biological children, stepchildren, adopted children, and parents. However, this section does not explicitly state whether these requirements apply solely to QFMs or if they also pertain to Type B relatives. For Example: if USBFMs Parents are listed as QFMs and they have children under 21 & unmarried listed as Type B, what documents are needed?

Adjudication: Agree. *Will update the language accordingly.*

9. Clarifying Affidavit Requirements:

- **Item 5 What additional information must be provided with this form?:** It would be helpful to clarify whether individuals providing affidavits must be based in the United States. While the instructions indicate that affiants do not need to be U.S. citizens, they do not specify if they must reside in the U.S. Requiring affidavits only from U.S.-based individuals is impractical, as not all USBFMs have close contacts or relatives in the U.S. who can attest to life events like birth, death, marriage or divorce. Often, those best able to verify these events—such as family members or community members—still reside in the applicant’s country of origin or in refugee camps.

Limiting affidavits to U.S.-based persons would place an unnecessary burden on applicants and could hinder their ability to provide sufficient evidence. For many applicants, affidavits from individuals in their country of origin or asylum are the most practical and reliable sources of verification. Additionally, when other evidence like school or religious records isn’t available, affidavits from people who know the applicant

are often the only realistic way to prove these events happened. Either removing the requirement to prove USBFM relationship to the QFM, or allowing affidavits from individuals outside the U.S. would promote a more accessible and inclusive process, supporting applicants in gathering the necessary documentation to support their application.

Adjudication: Agree. *It is not a requirement that individuals providing affidavits must be based in the United States, and the language has been updated to clarify.*

10. Conditionality of DNA Testing:

- **Item 6. What other information may be needed to establish a family relationship?** The instruction specifies that applicants and their biological parent(s) and/or child(ren) "may be required" to provide a DNA sample. This shift from "will be required" to "may be required" indicates that DNA testing is no longer an automatic or mandatory requirement; instead, it could be requested based on specific circumstances, allowing for case-by-case discretion. It is unclear how the decision will be made regarding who is requested to undergo DNA testing and whether this requirement will serve as a substitute for document submission.

Adjudication: No Action. *The form specifies that "the U.S. government or its designated representatives may suggest DNA testing for your QFM(s) and any derivative applicant(s) (unmarried child under the age of 21) if they are unable to prove the existence of their claimed family relationship." This is not a substitute for document submissions but may be requested if the documentation alone is insufficient.*

11. Electronic Signatures for DS-7656: Modernizing Access and Efficiency

- **DS-7656 Form Section V Signatures:** It is crucial that the instructions clearly state the acceptance of electronic signatures as a valid method for both the applicant and the resettlement agency representative. This update would reflect the realities of our increasingly digital world and enhance the efficiency of the application process. Emphasizing electronic signatures would alleviate potential barriers for applicants, particularly those in remote areas or lacking access to traditional mailing services.

Adjudication: No Action. *Electronic signatures are valid, as they have been in the past. No change to the form is required.*

12. This form was not available as a fillable PDF, but only could be filled in the software Cerenade. Because I do not have Cerenade, I was unable to submit the AOR for my client. Please make sure the AOR form is available as a fillable PDF.

Adjudication: No Action. *The scope of these form updates do not extend to the accessibility and applications used to fill out the document.*

13. We support the change in DNA testing language, which in the new instructions state that the USBFM and QFMs "may be required to provide a DNA sample to establish

your relationship” rather than “will be required to provide a DNA sample” for all biological relationships.

However, we are very concerned about two changes proposed in the new DS-7656 form instructions:

Language in the new proposed instructions states that: All family members that qualify as a QFM should be listed as a QFM in Section II, even if they could also qualify as a “Type B” relative. It is unclear to us why this would be required.

For example, if we file a P3 AOR for the spouse and five minor children of a USBFM, under the new instructions we would need to list each minor child (who we would typically list as Type B derivatives under the QFM spouse) as their own QFM. We are concerned that this would require each minor child to make their own refugee claim and perhaps be listed as the PA on their own refugee case. This situation seems inefficient and doesn’t make sense, as it would be better for the children to be included on the spouse’s USRAP case. We would like the flexibility to add applicants that could be considered as either QFMs or Type B derivatives as whichever makes the most sense for that case.

Adjudication: No Action. *There is no increase in documentation requirements as a result of this change. Documentation requirements to prove relationships apply to both QFMs and Type B relatives. Additionally, RSCs will continue to create cases based on USCIS case composition guidelines, such that minor children would still derive their refugee claim from a parent. Listing a child as a QFM on the AOR form, instead of a Type B relative, does not change that policy in any way.*

14. We are also concerned about the change that RAs would need to include additional information beyond what is required currently (proof of registration in the country of asylum for the family members who are applying, along with the USBFM’s proof of current legal status in the U.S.) when submitting the P3 AOR.

The new proposed DS-7656 form states that the USBFM must “attach copies of documents that provide proof that a relationship exists between you and your QFM(s)”, and if documents are not available, the USBFM must include secondary evidence or affidavits.

In our experience, many USBFMs who qualify to submit the DS-7656 have been forced to flee their home countries and often do not have access to these documents that provide proof of relationship, including birth certificates, marriage certificates from their home country, or other forms of primary or secondary evidence. Many QFMs are living in refugee camps or in hiding, and it is not safe or

accessible for them to seek copies of these documents through consulates or other channels.

Additionally, many of the USBFM and QFMs that are eligible for the DS-7656 have had few educational opportunities and may be coming from communities with low levels of literacy. It can be extremely difficult and time-consuming to solicit acceptable affidavit letters when primary or secondary evidence of relationships are not available.

Adjudication: No Action. *Same as 5. The form clarifies what documentation is acceptable but is not increasing the level of documentation that is required. Requesting available documentation as part of the initial submission is intentional to avoid delays later on in the process.*

15. The Notice of request for public comment states that the Department is soliciting public comments to allow the Department to “Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection” and “Minimize the reporting burden on those who are to respond”.

Under the Supplementary Information, the Average Time per Response is listed as One hour. In our experience, this is unrealistic. It can often take a USBFM much longer to gather even the documents that are currently required. Under the new instructions, the Average Time Burden on USBFMs and RAs filing the DS-7656 would be huge for many applicants if required to provide additional evidence, including secondary evidence and affidavits. The increased time commitment required to submit the DS-7656 with the additional requirements would greatly decrease the ability of Resettlement Agencies (RA) that have cooperative agreements with the Department of State to assist refugees with this process.

Due to the increased burden, we are requesting that the requirements that All family members that qualify as a QFM should be listed as a QFM in Section II, even if they could also qualify as a “Type B” relative and that USBFMs must attach copies of documents that provide proof that a relationship exists between you and your QFM(s) be reconsidered, and the language removed or changed back to the requirements specified in the version of the DS-7656 from dated 03-2015.

Adjudication: Agree. *“Average time per response” has been increased to 90 minutes.*

9. *Are payments or gifts given to the respondents?*

There are no payments or gifts to respondents.

10. *Describe assurances of privacy/confidentiality*

Department records related to refugee processing are confidential per Section 222(f) of the Immigration and Nationality Act (8 U.S.C. §1202(f)). That section states that such records “shall be considered confidential and shall be used only for the formulation, amendment, administration, or enforcement of immigration, nationality, and other laws of the United States.” As some of the information collected might be subject to the Privacy Act, 5 U.S.C. § 552a, the AOR contains a Privacy Act Statement and explains to the respondent how the information may be used.

11. Are any questions of a sensitive nature asked?

There are no questions of a sensitive nature on the AOR.

12. Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection

The estimated annual number of respondents is 300 per fiscal year. The annual hour burden is estimated to be 450 hours, based on each respondent taking ninety minutes to complete the AOR. These estimates are based on AOR submissions from the previous fiscal years and consultation with RAs, which have experience with these collections.

Assuming an average wage of \$10.00ⁱ per hour for respondents, each of whom takes ninety minutes to complete the AOR, it would "cost" a respondent $1.5 \times 10.00 = \$15.00$ to complete the form, with a total cost of $15 \times 300 = \$4,500$.

For DNA testing, it is assumed one hour to complete DNA testing in addition to one hour total of transportation to and from the sample collection site, it would "cost" a respondent $2 \text{ (hours)} \times 10.00 = \20.00 to complete the form, with a total cost of $20 \times 300 = \$6,000$.

The total cost for form completion and testing would be $4,500 + 6,000 = \$10,500$ per year. The U.S. government will pay for the cost of any DNA testing between the U.S.-based family member and their biological parent or child listed as the QFM. DNA testing between a QFM and any derivative applicant(s) (unmarried child under the age of 21), to prove the existence of their claimed family relationship, will be at no expense to the U.S. government.

13. Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.

Respondents will complete the AOR with the assistance of staff at the local office of an RA that receives federal funding to assist such clients. Respondents therefore will not have any out-of-pocket costs to complete the AOR.

Based on 300 annual applicants to this program, and assuming that all respondents will require some DNA testing at an average testing cost of \$560 per respondent (assuming the respondent has two overseas family members who need testing to confirm a relationship with the respondent), the total cost burden to respondents is \$168,000. However, since 95 percent of the applicants will be reimbursed, the total cost burden to the respondents will be $168,000 \times .05 = \$8,400$.

14. Describe the cost incurred by the Federal Government to complete this collection.

RPC staff estimate an average of 50 minutes per AOR to process the initial information submitted by respondents in the AOR; 10 minutes to process DNA requests sent to U.S.-based family members, and 20 minutes to process DNA lab test results.

The total cost to the Federal Government of this processing, at a \$44.00ⁱⁱ hourly rate for 80 minutes of work is approximately $(4/3 \times 44) \times 300 = \$17,600$ USD.

IOM, which acts as the panel physician in most cases, collecting the DNA sample, charges on average \$60ⁱⁱⁱ USD per sample. Assuming cases have an average of two samples taken overseas per case, the total cost of DNA collection is $60 \times 2 \times 300 = \$36,000$ USD.

Assuming that 95 percent of the 300 applicants will have their relationships confirmed by DNA, thus qualifying for reimbursement of DNA testing costs, the total cost to the Federal Government of such reimbursement will be $300 \times 560 \times .95 = \$159,600$ USD.

The total cost for the Federal Government would be $17,600 + 36,000 + 159,600 = \$180,800$ USD.

15. Explain any changes/adjustments to this collection since the previous submission.

This is a reinstatement of a previously approved Control Number. The following changes were made since the last renewal of the DS-7656.

Instructions & Fine Print and Form-wide Changes

- Instructions and ‘fine print’ text have been re-written for simplicity, clarity
- Instructions and ‘fine print’ text make it clear that the U.S. Government pays for DNA testing and updates language to suggest that DNA testing may be required vs. must be required.
- Instructions require that more documentation is collected earlier in the process from the applicant
- Table with “List of Relationship Type Codes” has been replaced with a more organized “List of Relationship Types” and the form throughout uses full relationship names in place of hard-to-understand relationship type codes
- Moved “Important Notice” text from above Section I to below Section I with the “Privacy Act Statement” and “Paperwork Reduction Act” text
- Estimated date checkboxes have been removed from all date fields
- Using date example (05 JAN 2010) in place of date format example (dd mmm yyyy) on all date fields
- Updated numerous data field titles and labels for clarity and usability
- Eliminated repetitive/unnecessary page header data on all subsequent form pages
- Changed “Sex” to “Gender” and added the X gender marker option

Section I

- Collecting only one phone number, instead of having fields for home, work, and cell
- Removed “Agency that processed your case overseas, if known” field

Section II

- Reformatted section fields to provide a user experience similar to Section I
- Removed “Current & Valid Registration in Country of Asylum” field
- Added “Preferred Language” to allow RSC caseworkers to better prepare cases for USCIS
- Updated “Mailing Address” to “Current Location”, eliminating “Street Address” and “Postal Code” fields
- Removed all “Alternate Contact Address” fields including phone numbers, and email address
- Removed “Relationship to U.S.-based Family Member” field for Relatives 02-16
- Removed “Comments/Additions/Explanations”

Section III

- Removed current Section III in its entirety
- What was the last page of the form and labelled “IMAGES – Section II” has become the new Section III so that it is easier for users to match the photos of applicants in Section III with their data in Section II
- This page, which shows photos of all the applicants along with names and dates of birth, has been updated for usability

Section IV

- Minor spacing updates for usability

Section V

- Minor spacing updates for usability

16. Specify if the data gathered by this collection will be published.

The Department will not publish the results of this collection

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date. Otherwise, write “The Department will display the OMB expiration date.”

The Department will display the expiration date for OMB approval of the information collection.

18. Explain any exceptions to the OMB certification statement below.

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

ⁱ Source: Urban Institute, "Bringing Evidence to the Refugee Integration Debate," April 2018

ⁱⁱ Source: The Refugee Processing Center (RPC), administered by Devis, a contractor of the U.S. Department of State to build and maintain the case processing system of the U.S. Refugee Admissions Program (USRAP).

ⁱⁱⁱ Source: International Organization of Migration, Global Coordinator for the USRAP. IOM performs medical and certain technical functions for the USRAP, including collecting DNA samples.