SUPPORTING STATEMENT FOR
Application for Citizenship and Issuance of Certificate under Section 322
OMB Control No.: 1615-0087
COLLECTION INSTRUMENT(S): N-600K

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 U.S. Citizenship and Immigration Services (USCIS) requires the information collected on the Application for Citizenship and Issuance of Certificate of Citizenship Under Section 322, Form N-600K to make a determination on whether the applicant has met the citizenship eligibility requirements under section 322 of the Immigration Nationality Act (INA). Upon approval of the application, the child is naturalized and issued a Certificate of Citizenship by USCIS.

Executive Order (EO) 14168, "Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government," states that it is the policy of the United States to recognize two sexes, male and female and these sexes are not changeable. *See* 90 FR 8615 (Jan. 20, 2025). The EO instructs agencies, including the Department of Homeland Security (DHS), USCIS, to give the terms "sex", "male", "female", "men", "women", "boys" and "girls" the meanings set forth in section 2 of the EO when interpreting or applying statutes, regulations, or guidance and in all other official agency business, documents, and communications. Per section 3 of the EO, all agencies, including USCIS, shall use the term "sex" and replace "gender" with "sex" in all applicable information collections. USCIS information collections that require an individual's sex shall list "male" or "female" and shall not request gender identity.

This collection of information is necessary to comply with Section 2 and Section 3 of the EO. USCIS will update its forms and systems to reflect the EO definitions when collecting information from individuals who submit immigration benefit requests. USCIS, as a component of DHS, has the following statutory and regulatory authorities, to collect information from applicants for immigration benefits, to secure the homeland and prevent terrorism:

- The Homeland Security Act, 2002, P.L. 107-296;
- The Intelligence Reform and Terrorism Prevention Act (IRTPA) of 2004, P.L. 108-458;
- Implementing Recommendations of the 9/11 Commission Act of 2007 ("The 9/11 Act"), P.L. 110-53;
- The Immigration and Nationality Act, as amended;

- Title 8 of the U. S Code; and
- Title 8 of the Code of Federal Regulations.

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.

Form N-600K is used by children who regularly reside in a foreign country to claim U.S. citizenship based on eligibility criteria met by their U.S. citizen parent(s) or grandparent(s). The form may be used by both biological and adopted children under age 18. USCIS uses information collected on this form to determine that the child has met all of the eligibility requirements for naturalization under section 322 of the Immigration and Nationality Act (INA). If determined eligible, USCIS will naturalize and issue the child a Certificate of Citizenship before the child reaches age 18.

To meet the standards of EO 14168, Section 2 and 3, USCIS will update Form N-600K to reflect the EO definitions when collecting information from individuals who submit immigration benefit requests. An individual's sex is a biographic identifier and data element used to help USCIS confirm an individual's identity both as it relates to the submitted immigration benefit request and to other records.

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.

Form N-600K is available for paper filing as a fillable PDF via the USCIS website. The form is also available for electronic filing via the USCIS website. The PDF version can be filled out electronically, but must be printed and mailed to USCIS. The online filing version can be completed, signed, and submitted to USCIS electronically.

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 collected via Form N-600K is used specifically to determine if a child who regularly resides outside of the United States meets the requirements to naturalize under INA section 322. There is no other collection of information that has the necessary information to adjudicate this issue. There is no duplication of information collection via another form.

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

This collection of information does not have an impact on small businesses or other small entities.

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.

Section 322 of the INA provides for to the naturalization of adopted minors or biological children who regularly reside outside the United States and whose United States citizen parent(s), grandparent(s) or legal guardian wish to have them naturalize. The Form N-600K is used to demonstrate that the child meets certain eligibility conditions while under the age of 18 years. Since Form N-600K provides an organized framework for establishing the authenticity of such eligibility, it is essential for providing prompt, consistent and correct processing of such applications for citizenship. If the information is not collected the applicant cannot show that he or she has met all of the eligibility requirements for naturalization and receipt of a certificate of citizenship.

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 submitting a non-substantive change to a currently approved collection request to OMB. Publication of Federal Register Notices is not required.

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.

The Privacy Impact Assessments associated with this information collection are:

- DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4);
- DHS/USCIS/PIA-056 USCIS ELIS; and
- DHS/USCIS/PIA-071 myUSCIS Account Experience

The System of Record Notices associated with this information collection are:

- DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking

System of Records, September 18, 2017, 82 FR 43556, and

- DHS/USCIS-007 - Benefits Information System October 19, 2016 81 FR 72069

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 some questions regarding marital history of parents that are considered sensitive in nature. However, this information is necessary to make a determination on the applicant's eligibility for citizenship and there is no assurance of confidentiality.

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.**

		A	B	C (=AxB)	D	E (=CxD)	F	(=ExF)

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	Application for Citizenship and Issuance of Certificate Under Section 322 (N-600K – paper file)	2,187	1	2,187	1.53	3,346	$40.89	$136,818
Individuals or Households	N-600K E-file	2,860	1	2,860	1.14	3,260	$40.89	$133,301
Total				**5,047**		6,606		**$270,119**

** The above Average Hourly Wage Rate is the May 2021 Bureau of Labor Statistics average wage for All Occupations of $28.01 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling $40.89. The selection of "All Occupations" was chosen because respondents to this collection could be expected from any occupation.*

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult**

with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995; (2) to achieve regulatory compliance with requirements not associated with the information collection; (3) for reasons other than to provide information or keep records for the government; or, (4) as part of customary and usual business or private practices.**

There are no capital, start-up, operational or maintenance costs associated with this collection of information. For informational purposes only, the filing fee for Form N-600K when filed on paper is $1,385 and $1,335 when filed online.

This information collection may impose some out-of-pocket costs on respondents in addition to the time burden for the form's preparation.

For form preparation, legal services, translators, document search and generation, and postage, USCIS estimates the average cost of this information collection may vary widely, from as little as $20 to $1000 per respondent. USCIS estimates that the average cost for these activities is $515 and approximately 25% of the total respondent population may incur this cost. The total cost to respondents would generate as follows: 5,047 respondents x 25% of the population = 1,262 multiplied by the average cost per response of $515 = $649,801.

The total estimated cost to respondents is **$649,801.** The estimated average cost per respondent is $128.75.

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.

The estimated cost of the program to the Government for N-600Ks is calculated by using the estimated number of respondents 5,047 x $1,385 which includes the suggested average hourly rate for clerical, officer, and managerial time with benefits), fee charge, which equals **$6,990,095**.

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

To meet the standards of EO 14168, Section 2 and 3, USCIS will update Form N-600K to

reflect the EO definitions when collecting information from individuals who submit immigration benefit requests. USCIS shall use the term "sex" and replace "gender" with "sex" in all applicable information collections. USCIS information collections that require an individual's sex shall list "male" or "female" and shall not request gender identity. USCIS is reporting no change to the estimated annual hour burden and estimated annual cost burden to respondents for this information collection as a result of this action.

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.