SUPPORTING STATEMENT FOR
Declaration of Financial Support
OMB Control No.: 1615-0014
COLLECTION INSTRUMENT(S): Form I-134

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.

Certain aliens seeking parole into the United States pursuant to section 212(d)(5) of the Immigration and Nationality Act (INA), and B, F, and M nonimmigrants seeking extension of stay or change of status under sections 214 and 248 of the INA, must demonstrate that they have sufficient financial resources for the duration of their stay.

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), U.S. Citizenship and Immigration Services (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.

The U.S. Department of Homeland Security (DHS) and consular officers of the Department of State (DOS) use the Form I-134 to determine whether, at the time of the beneficiary's application, petition, or request for certain immigration benefits, an alien has sufficient financial support to pay for expenses for the duration of their temporary stay in the United States.

To meet the standards of EO 14168, Section 2 and 3, USCIS will update Form -134 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 both an individual's identity 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.

This information collection provides the most efficient means for gathering and processing information about whether certain aliens have financial support to pay for expenses that arise during the alien's temporary stay in the United States. Form I-134 is available as a fillable PDF on the USCIS website at uscis.gov/i-134. The form can be completed electronically, printed, signed, and submitted to U.S. Citizenship and Immigration Services (USCIS) by mail. Form I-134 can also be filed with DOS. See www.travel.state.gov for more information on filing.

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.

A search of USCIS' automated forms tracking system revealed no duplication. There is no similar data collected.

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.

If the information is not collected, USCIS would not be able to determine whether certain aliens seeking to come to the United States temporarily have sufficient financial support to cover expenses for the duration of their stay in the United States.

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.

This collection is covered under the following Privacy Impact Assessments:

- DHS/USCIS/PIA-051 - Case and Activity Management for International Operations (CAMINO) - June 2020;
- DHS/USCIS/PIA-003 - Integrated Digitization Document Management Program (IDDMP) – 2007;
- DHS/USCIS/PIA-056(a) USCIS Electronic Immigration System (USCIS ELIS) – May 2018;
- DHS/USCIS/PIA-071(a) myUSCIS Account Experience - July 2020;
- DHS/CBP/PIA-024(c) Arrival and Departure Information System – January 2020; and
- DHS/CBP/PIA-068 CBP One Mobile Application – February 2021

The collection is covered under the following System of Records Notices:

- DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records September 18, 2017, 82 FR 43556;

- DHS/USCIS-007 - Benefits Information System October 10, 2019, 84 FR 54622; and
- DHS/USCIS-018 - Immigration Biometric and Background Check July 31, 2018, 83 FR 36950.

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.

This information collection contains questions that are of a sensitive nature. Respondents must provide information and records about personal income and financial resources. This information is necessary to establish that an alien named on Form I-134 has sufficient financial resources to pay for expenses during their temporary stay in the United States.

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 and Households	Declaration of Financial Support, Form I-134	2,500	1	2,500	1.65	4,125	$45.96	$189,585
Total				**2,500****		**4,125**		**$189,585**

**The above Average Hourly Wage Rate is the May 2023 Bureau of Labor Statistics average wage for All Occupations of $31.48 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling $45.96.*

*** The estimated number of respondents includes receipts of Form I-134 by both USCIS and Department of State.*

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. There is no fee cost to respondents for filing these requests. USCIS, however, estimates that respondents will incur an estimated cost of $4.25 average postage cost for each respondent to submit the completed I-134 (paper) package to USCIS.

Postage to mail completed package (2,500 x $4.25 average postage) = **$10,625** (total annual cost burden to respondents).

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 to the Government is $161,625.

This figure is calculated by multiplying the estimated number of respondents (2,500) by the time required to adjudicate the form (1 hour), which is multiplied by the average hourly rate of USCIS adjudicators ($64.65).

USCIS establishes its fees using an activity-based costing model to assign costs to an adjudication based on its relative adjudication burden and use of USCIS resources. Fees are established at an amount that is necessary to recover these assigned costs, plus an amount to recover unassigned overhead (which includes the suggested average hourly rate for clerical, officer, and managerial time with benefits) and immigration benefits provided for free. USCIS uses the fee associated with an information collection as a reasonable measure of the collection's costs to USCIS, since these fees are based on resource expenditures related to the benefit in question. In addition, this figure includes the estimated overhead cost for printing, stocking, distributing and processing of this form.

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 I-134 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.