

**SUPPORTING STATEMENT FOR
Biographic Information (for Deferred Action)
OMB Control No.: 1615-0008
COLLECTION INSTRUMENT(S): G-325A**

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.**

Section 103(a)(1) of the Immigration and Nationality Act (INA), 8 U.S.C. section 1103(a)(1), gives the Secretary of Homeland Security general authority to enforce and administer the immigration laws. Section 103(a)(3) of the INA, 8 U.S.C. section 1103(a)(3), authorizes issuance of forms, instructions, and guidance necessary to carry out the authority provided in section 103(a)(1) of the INA, 8 U.S.C. section 1103(a)(1).

Deferred action is a discretionary determination to defer removal action of an alien as an act of prosecutorial discretion. For aliens requesting deferred action (other than deferred action based on DACA, Violence Against Women Act (VAWA), and A-3, G-5, and T and U nonimmigrant visas), Form G-325A, along with supporting evidence, is filed with U.S. Citizenship and Immigration Services (USCIS). Form G-325A collects biographic information and a statement from the alien explaining why he or she is requesting deferred action and why he or she warrants a favorable exercise of discretion.

Any alien may be required to submit biometric information if the regulations or form instructions require such information or if requested in accordance with 8 C.F.R. 103.2(b)(9). The U.S. Department of Homeland Security (DHS) may collect and store for present or future use, by electronic or other means, the biometric information submitted by an alien. DHS may use this biometric information to conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws. See 8 C.F.R. 103.16; 8 U.S.C. 1103.

USCIS, as a component of DHS, has the following statutory and regulatory authorities to collect information from aliens requesting deferred action or 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.

Revision:

This action is necessary to enable the execution of the Executive Office of the President issued Executive Order (EO) 14159, “Protecting the American People Against Invasion.”¹ Specifically, Section 16 of the Executive Order, Addressing Actions by the Previous Administration,” which directed the Secretary of State, the Attorney General, and the Secretary of Homeland Security to promptly take all appropriate action, consistent with law, to rescind policy decisions of the previous administration that led to the increased or continued presence of illegal aliens in the United States, and align any and all departmental activities with the policies set out by this order and the immigration laws. This action includes ensuring that DHS exercises its authority to defer removal action only in compelling cases and only on a case-by-case individualized basis, as well as ensuring that employment authorization is provided in a manner consistent with section 274A of the INA, 8 U.S.C. § 1324a, and that employment authorization is not provided to any aliens in contravention of EO 14159.

Consistent with USCIS’s rescission of its statelessness policy guidance on June 5, 2025,² USCIS is revising Form G-325A to remove the option to select “Statelessness” as a filing category for a deferred action request.

Consistent with the Secretary’s Guidance on Deferred Action memo issued on April 4, 2025, USCIS is revising Form G-325A to remove the options to select “Labor Investigation-Based (LIB DA)” and “Special Immigrant Juvenile (SIJ DA)” as filing categories for a deferred action request.³

On April 10, 2026, USCIS published a policy memo “Special Immigrant Juvenile Classification and Deferred Action”⁴ to eliminate the March 2022 policy automatically considering deferred action (and related employment authorization) for aliens classified as Special Immigrant Juveniles (SIJs) who were ineligible to apply for adjustment of status due to immigrant visa unavailability.⁵ This update is necessary to better align with policies with the INA, and to address concerns consistent with EO 14161, “Protecting the United States From Foreign Terrorists and Other National Security and Public Safety Threats.”⁶ While any alien with deferred action, including an approved SIJ petitioner,

1 See [90 FR 8443](#) (Jan. 29, 2025).

2 See [Rescission of USCIS Statelessness Policy](#), PA-2025-06, issued June 5, 2025.

3 See Memorandum from former Secretary Noem, *Guidance on Deferred Action* (Apr. 4, 2025).

4 See [Special Immigrant Juvenile Classification and Deferred Action](#), PM-602-0198, issued April 10, 2026.

5 See [Special Immigrant Juvenile Classification and Deferred Action](#), PA-2022-10, issued March 7, 2022.

6 See [90 FR 8451](#) (Jan. 30, 2025).

may submit Form G-325A to request a new grant of deferred action, USCIS has removed the specific item on the form indicating that the request is for a renewal of SIJ-DA as a result of the rescission of the 2022 policy.

Finally, USCIS is revising Form G-325A to remove the option for aliens to request employment authorization concurrently with a request for deferred action on Form G-325A.

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.

USCIS uses Form G-325A to collect biographic information from certain aliens requesting deferred action, including a statement that explains why he or she is requesting deferred action and why he or she warrants a favorable exercise of discretion. USCIS uses the information collected on Form G-325A to determine whether to grant deferred action on a case-by-case basis in the exercise of discretion.

USCIS also collects biometric information from certain aliens requesting deferred action, such as those USCIS has not previously collected biometrics in connection with an underlying application or petition, to verify the alien's identity, or to check or update their background information.

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.

The process requires a respondent to submit Form G-325A and supporting evidence in response to this collection of information. Form G-325A is currently available as a paper form that can be accessed electronically, completed online, and then printed, signed, and mailed or hand delivered to the designated USCIS location, along with the required supporting evidence. This form and its instructions are available on the USCIS website at www.uscis.gov/g-325a. Currently, the collection of information does not include an electronic submission option.

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.

There is no current collection of information that obtains the information necessary to make a deferred action determination for an alien requesting deferred action (other than deferred action based on DACA, Violence Against Women Act (VAWA), and A-3, G-5,

and T and U nonimmigrant visas).

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.

There is no 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 collection is not approved, USCIS will not have all of the information needed to assess whether aliens requesting deferred action (other than deferred action based on DACA, VAWA, and A-3, G-5, and deferred action related to bona fide determinations and waitlist placement related to T and U nonimmigrant status) warrant deferred action on a case-by-case basis in the exercise of discretion.

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 C.F.R. 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 C.F.R. 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 May 29, 2025, USCIS published a 60-day notice in the Federal Register at 90 FR 22752. USCIS received 55 comments after publishing that notice. USCIS's responses to the public comments can be found in the following attachment shown in the Supplementary Documents: *60-Day Public Comment Response Matrix*.

On January 14, 2026, USCIS published a 30-day notice in the Federal Register at 91 FR 1546. USCIS did not receive comments after publishing that notice.

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

USCIS does not provide any payment for benefit sought.

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

There is no assurance of confidentiality provided to respondents⁷.

⁷ Requestors who use this form may be entitled to information protections under 8 U.S.C. 1367 if they have otherwise requested or received VAWA/T/U-based benefits. Requesters who use this form may also be entitled to confidentiality protections under 8 C.F.R § 208.6.

This collection is covered under the following Privacy Impact Assessment:

- DHS/USCIS/PIA-061 Benefit Request Intake Process, March 15, 2016.

The collection of information is covered by 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; and
- DHS/USCIS-007 Benefits Information System, October 10, 2019, 84 FR 54622.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

- 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	G-325A	7,500	1	7,500	2.31	17,325	\$43.45	\$752,771
Total				7,500		17,325		\$752,771

* The above Average Hourly Wage Rate is the [May 2022 Bureau of Labor Statistics](#) average wage for All Occupations of \$29.76 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$43.45. The selection of “All Occupations” was chosen because respondents to this collection could be expected from any occupation.

- 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.

USCIS estimates that respondents to this collection of information may incur costs for postage. USCIS is estimating that respondents could submit the package via normal 1st class mail for a cost of approximately \$8, or via Priority Mail for a cost of approximately \$27, or via another service such as FedEx for a cost of approximately \$41. The \$25 average reflects the belief that a larger percentage will choose a U.S. Mail service, but that more expensive options could be used as sometimes is the case. USCIS estimates these costs as \$25 per respondent x 7,500 respondents, for a total of **\$187,500**.

For informational purposes, the filing fee for Form G-325A can be found in the G-1055, Fee Schedule, at www.uscis.gov/g-1055.

- 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 cost to the Federal government to process these requests is estimated based on the 2022 OPM General Schedule (Base) of a GS-13, Step 4, program analyst spending approximately 2,000 hours a year reviewing and making determinations. The hourly wage, adjusted for benefits, is $\$42.81 \times 1.46 = \62.50 . The total cost to the Federal government is estimated at **\$125,005** (Calculated: $\$62.50 \times 2,000 = \$125,005$).

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

	A	B	C = B-A	D	E	F = E-D
Data collection Activity/Instrument (in hours)	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
G-325A	17,925	17,325	(600)			
Total(s)	17,925	17,325	(600)			

USCIS is reporting a decrease in the estimated annual hour burden to respondents for this collection of information as a result of this action. This action resulted in a decrease in the estimated average burden per response from 2.39 hours to 2.31 hours. USCIS has

provided a synopsis of the edits associated with the information collection within the paper filing instrument Table of Changes (TOC) for Form G-325A.

USCIS is reporting no change in the estimated annual cost burden to respondents for this collection of information as a result of this action. USCIS expects that the number of annual respondents requesting renewal of automatic SIJ DA will decrease in the future because of the recission of that policy. We currently lack reliable data on which to base an estimate of annual respondents, but will update our estimate of annual respondents for Form G-325A filings in the next submission of this information collection to OMB.

- 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.