SUPPORTING STATEMENT FOR
Collection of Qualitative Feedback through Focus Groups
OMB Control No.: 1615-0126
COLLECTION INSTRUMENT(S): No Form

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.

Executive Order 12862 directs Federal Agencies to "continuously evaluate their performance in meeting [a] standard of…competent, efficient, and responsive service." In order to determine if our programs meet our customer needs and are effective, the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) requests OMB approval of a generic clearance to conduct focus groups. USCIS requires original data collection from these focus groups of potential and actual applicants for immigration benefits (our customers), employers, and stakeholders (such as law enforcement, non-profit groups, and the legal community).

Topics to be covered in the focus groups include the effectiveness and cost of applying for immigration benefits; discrimination; privacy; how applicants learn about and interpret their eligibility for immigration benefits; reasons for applying for a benefit; applicant understanding of and compliance with benefit requirements; and applicant and stakeholder awareness and perceptions about various USCIS programs and policies. On a secondary level, the focus groups will also provide background to help USCIS create well-developed survey instruments (collections which are covered under separate OMB clearances).

This collection of information is necessary to enable the Agency to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery and program operations. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs. This feedback will also provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service or programs, and/or focus attention on areas where communication, training or changes in operations might improve delivery of USCIS services. These collections will also allow for ongoing, collaborative, and actionable communications between the Agency and its customers and stakeholders.

On an annual basis, USCIS will draft and submit a brief summary of OMB approved studies that have been conducted under this collection during the year. The report will

cover the utility of the studies and describe how the information collected is being used by the agency.

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 a variety of methods, including interviews, customer service surveys, and focus groups, to solicit information from the public that can help it achieve its mission goals. As one collection tool among this constellation of methods, focus groups offer USCIS the opportunity for qualitative data collection. They allow for the efficient collection of information, in-depth exploration of major themes and perspectives, and help develop new insights. The focus groups envisioned under this clearance will supplement, but not supplant, the agency's other research and evaluation efforts (including quantitative data collection and analysis). Moreover, the data to be collected from these focus groups is not statistical in nature (and the agency understands that study results cannot and will not be generalized to larger populations). The data that can be collected in the proposed focus groups will serve four goals. First, it will allow USCIS to develop a better understanding of some stakeholders' perceptions about immigration benefits and related USCIS services. Second, it will provide insights on how stakeholders experience the immigration benefits application process. Third, it will allow USCIS to explore outreach and marketing efforts to applicants and potential applicants for USCIS benefits (such as citizenship). Finally, in some cases, the data collected will be used for methodological research – i.e., to inform survey instruments, for which separate OMB approval will be sought.

To meet these important goals, USCIS will conduct a series of focus groups which gather qualitative feedback from stakeholders. Respondents for potential inclusion in these studies will be drawn from the following groups of stakeholders:

Stakeholder Group	Code
Customers (petitioners and beneficiaries of immigration benefits)	C
Advocates (non-governmental organizations and related groups)	A
Representatives (legal)	R
Businesses (companies which employ non-immigrants and immigrants)	B
Law Enforcement (federal, state, and local law enforcement agencies)	L
Internal (USCIS employees, management officials)	I

Specific protocols (and defined respondents) will be organized by study topic and submitted to OMB for approval through separate ICRs. However, in order to demonstrate generally what topics and questions these stakeholder groups will be asked, the following matrix outlines topical categories and illustrative questions, correlated with stakeholder groups (by the above code). Please note that the focus group data collected will not be used as the sole or definitive agency measure of each topical category.

Topical Category	Illustrative Focus Group Question	Stakeholder Group (by code)
Service Quality	How well is USCIS providing immigration benefit services?	C, A, R, B
Fraud	How is USCIS ensuring that immigration benefits are provided to the right individuals?	L, I, R, A
Process	How can USCIS improve the processes it uses to adjudicate immigration benefits?	I
Usability	Are USCIS's application and adjudication systems easy to use?	C, A, R, B, L, I
Communication	Are USCIS's communication programs and processes effective?	C, A, R, B, L, I
Program Knowledge	Are stakeholders aware of USCIS's programs and immigration benefits?	C, A, R, B, L
Training	How well do USCIS's internal training programs and procedures address training needs?	I
Outreach/ Engagement	How effective are USCIS's outreach efforts to stakeholders?	C, A, R, B, L
Recommendations	What recommendations do stakeholders have to improve USCIS programs and processes?	C, A, R, B, L, I

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.

Whenever possible and if appropriate, USCIS will collect information from focus group participants electronically and/or use online collaboration tools to reduce burden.

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 topics (other than customer service) that will be covered under the focus group surveys will not duplicate any other USCIS collection of information, including OMB Control Number 1615-0121, which is for customer service surveys only.

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.

Small businesses or other small entities may be involved in focus groups, but USCIS will minimize the burden of information collections approved under this clearance by limiting the time commitment required to participate in a focus group. In addition a small entity will only be engaged in a USCIS-sponsored focus group once in any 6-month period.

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.

Without the feedback which can be obtained through these focus groups, USCIS will not be able to set up focus groups in a timely manner so as to use the most adequate and timely source of information available to adjust its services or improve its program administration, based on stakeholder feedback.

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.

On May 11, 2026, USCIS published a 60-day notice in the Federal Register at 91 FR 25588. USCIS did not receive comments after publishing that notice.

On September 17, 2026, USCIS published a 30-day notice in the Federal Register at 91 FR 58912. USCIS did receive one comment after publishing that notice. USCIS did not make any changes to the information collection in response to this comment. Please see USCIS' response below:

- Comment: Generic umbrella clearances must be restricted strictly to voluntary qualitative feedback. If individual subordinate GenICs are utilized to establish binding regulatory interpretations or condition immigration benefits on participation, the collection exceeds generic clearance authority.
- Response: USCIS acknowledges the commenter's concern. This generic clearance is limited to voluntary, qualitative feedback regarding USCIS service delivery and customer or stakeholder experiences. Collections conducted under this clearance are not statistical surveys intended to produce results generalizable to the population, and participation is voluntary. USCIS does not use participation in, or responses to, these feedback collections to establish binding regulatory interpretations or to determine, condition, grant, or deny an immigration benefit. USCIS will ensure that any individual Generic Information Collection requests submitted under this umbrella clearance remain consistent with the approved scope and applicable requirements. Therefore, USCIS is not making changes to the information collection in response to this comment

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

A payment will not always be made, but small expenditures may be made to participants in in-person focus groups to encourage participation. The exact amount paid to individual participants will be based on the time and effort required of participants, and what is reasonably necessary under the circumstances. The specific amounts offered will vary but they will be specified in the commitment entered into with the contractor that

USCIS engages to carry out the focus groups.

Incentives: The resources calculated for participant incentives to participate are estimated at $50 per respondent, as per OMB guidelines. Note that in exceptional circumstances, a somewhat higher incentive of $75 may be required for hard-to-reach respondents. This estimate includes 2,400 respondents at $50 each and 600 at $75 each (total $165,000).

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

USCIS will keep the information private to the extent permitted by law.

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

There are no questions of 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**

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
Individual or households; Business or other for-profit; Not-for profit institutions	Focus Group	25,000	1	25,000	1.5	37,500	$37.55	$1,408,125
Total		**25,000**	**1**	**25,000**		**37,500**		**$1,408,125**

* *The above Average Hourly Wage Rate is the May 2019 Bureau of Labor Statistics average wage for All Occupations of $25.72 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling $37.55. 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. USCIS estimates that respondents will not incur costs to respond to the survey activities associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annualized Cost Analysis:

Focus Groups	
Collecting and Processing	$938,780
Participant Incentives	$ 6,875
Travel	$ 54,000
Total Annual Cost to Government	**$ 999,655**

Focus Groups – Recruiting, Convening, Data Collection, Incentives, and Travel: This figure is calculated by multiplying the estimated number of respondents (25,000) x (1) number of responses x 1 hours per response (Time required for recruiting, planning, system development, conducting focus groups, and transcribing the data) x average hourly pay rate of USCIS employee ($25.72 per hour x 1.46 benefit multiplier). (total, $938,780). To this we add resources for participant incentives to participate, which are estimated at $50 per respondent, as per OMB guidelines. Note that in exceptional circumstances, a somewhat higher incentive of $75 may be required for hard-to-reach respondents. This estimate includes 100 respondents at $50 each and 25 at $75 each (total $6,875). To this, we add in the cost of approximately 36 trips to locations around

the country to conduct the focus groups over 1-2 days at an estimated average cost of $1,500 per trip (total, $54,000).

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

Data collection Activity/Instru-ment	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Collection of Qualitative Feedback through Focus Groups				900,000	37,500	(862,500)
Total(s)				900,000	37,500	(862,500)

USCIS is reporting a decrease in the estimated annual hour burden based on historical use of the collection. There is no change to the estimated annual cost burden to respondents for this collection of information.

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.

The data will be analyzed using both standard qualitative analysis techniques and in some cases may be analyzed with text analysis tools such as qualitative analysis software. Data will be tabulated only in summary statistics tables. Although feedback collected under this generic clearance provides useful information, it does not yield data that can or will be generalized to the overall population. Findings will be used for general service and program improvements.

The Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when

appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public" and will include specific discussion of the limitation of the qualitative results discussed above.

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 this information collection in accordance with OMB regulations.

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.

See answers to Part B under separate document.