

**SUPPORTING STATEMENT FOR
USCIS Tip Form
OMB Control No.: 1615-NEW
COLLECTION INSTRUMENT(S): G-1530**

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 information is collected in furtherance of USCIS' mission to administer and enforce U.S. immigrations as provided in the Immigration and Nationality Act, federal regulations, executive order, and delegation orders. In administering and enforcing the immigration laws, USCIS determines whether individuals and entities applying for an immigration benefit are eligible to obtain the benefit sought. USCIS' adjudication of immigration benefit requests requires, among other things, verifying the identity of the requestors as well as their threat (if any) to national security, public safety, or the integrity of the immigration system.

As such, USCIS routinely verifies information provided by an applicant, petitioner, beneficiary, or requestor in both the immigration application/petition/request and any supporting evidence or documentation. This includes when a third party provides potential derogatory information (anonymous or signed) relevant to a benefit request. Any derogatory information relating to an immigration benefit request could serve as a basis for USCIS to investigate the matter further.

USCIS' specific authorities include:

- INA § 103(a)(1) - The Secretary of Homeland Security has the authority to administer and enforce the INA.
- INA § 287(b) - The Secretary may designate officers or employees to take and consider evidence concerning any matter which is material or relevant to the enforcement of the INA.
- INA §§ 103(a)(4), 287(b); 8 C.F.R. § 2.1 - These authorities may be delegated.
- Executive Order 13,780, Mar. 9, 2017, (82 FR 13209). This Executive Order directs the Department of Homeland Security to implement, among other things, appropriate means for ensuring the proper collection of all information necessary for a rigorous evaluation of all grounds of inadmissibility or grounds for the denial of other immigration benefits.
- DHS Delegation of Authorities 0150 – USCIS has authority to administer the INA.
- DHS Delegation 0150.1(II)(I) - USCIS may investigate alleged civil and criminal violations of the INA, including but not limited to, alleged fraud with respect to

applications or determinations within USCIS and make recommendations for prosecutions or other appropriate actions when deemed advisable.

- DHS Delegation 0150.1(II)(N) - USCIS may place aliens in removal proceedings..
- DHS Delegation 0150.1(II)(S) and INA §§ 287(a)-(b),(f) and 235(d)(3)-(4)- USCIS may interrogate aliens, issue subpoenas, administer oaths, take and consider evidence, and fingerprint or photograph aliens.

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.

Any credible and relevant derogatory information which relates to an immigration benefit request (either pending or approved and currently valid) could suffice as a basis for USCIS to investigate the matter further. Information provided on this webform will be reviewed by the USCIS Fraud Detection and National Security(FDNS) Tip Unit for indications of possible immigration benefit fraud (i.e., marriage fraud, visa fraud, fraud relating to an individual's identity,etc.) and abuse (i.e., misuse, non-compliance, etc.). Tips with sufficient indicators and supporting information will be forwarded to the appropriate Service Center or Field Office FDNS Immigration Officers for further research, investigation. and possible administrative action.

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.

USCIS will make the collection available for completion and submission via electronic system.

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.

This collection of information is not duplicated by USCIS and will collect information unique to the mission of the agency.

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 may impact small businesses if they have a fraud tip to submit, but any impact will be minimal and the same as for any other respondent.

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.

USCIS administers the nation's immigration system and adjudicates whether individual or entities who apply for an immigration are eligible to obtain and retain the benefit sought. To fulfill its responsibilities, USCIS, among other things, must verify the identity of benefit requestors as well as determine whether they pose a threat to national security, public safety, or the integrity of the immigration system. USCIS will use this information to research and investigate suspected credible and relevant claims of immigration benefit fraud impacting both open adjudications as well as previously approved benefit requests where the benefit remains valid. Without the collection of this information, the agency is hindered in its mission to safeguard the homeland, the American people, and the integrity of immigration system.

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.

On February 15, 2019, USCIS published a 60-day notice in the Federal Register at 84 FR 4518. USCIS received 301 comments after publishing that notice. Responses to these comments are provided on the “Appendix: G-1530 Public Comments and Responses Matrix” document.

On August 8, 2019, USCIS published a 30-day notice in the Federal Register at 84 FR 39010. USCIS did not receive comments.

- 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 System of Records Notices associated with this information collection are:

- DHS/ALL-016 Department of Homeland Security Correspondence Records November 10, 2008, 73 FR 66657
- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556
- DHS/USCIS-006 Fraud Detection and National Security Records (FDNS) August 8, 2012, 77 FR 47411

The associated Privacy Impact Assessment are:

- DHS/USCIS/PIA-013-01 Fraud Detection and National Security Directorate

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 asked.

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 (=Cx D) | 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- 1530/USCIS Tip Form | 55,000 | 1 | 55,000 | 0.166 Hours (10 Minutes) | 9,130 | \$35.54 | \$324,480 |
| Total | | | | 55,000 | | 9,130 | | \$ 324,480 |

** The above Average Hourly Wage Rate is the May 2017 Bureau of Labor Statistics average wage for All Occupations of \$24.34 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$35.54. The selection of "All Occupations" was chosen as the expected respondents for this collection could be expected to be 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 is no cost burden placed on the respondents. The respondent provides basic information regarding suspected fraud and incurs no cost for attorney fees, postage, or

other possible costs.

- 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:

| | | |
|------------------------------------|----|---------|
| a. Printing Cost: | \$ | 0 |
| b. Collecting and Processing: | \$ | 881,650 |
| c. Total Cost to Program: | \$ | 881,650 |
| d. Fee Charge: | \$ | 0 |
| e. Total Annual Cost to Government | \$ | 881,650 |

Government Cost

The estimated cost of the collecting and processing is calculated first by estimating the time to collect and process the tips received from the web form. The estimated number of tips (55,000) multiplied by the estimated number of minutes required to process the average tip (30) is the total number of work minutes (1,650,000). This is divided by 60 to estimate the total number of work hours (27,500). The total number of work hours is multiplied by the fully loaded hourly salary for a GS-11 step 3 (\$32.06) to determine the total cost to the government (\$881,650).

The fully loaded average hourly wage rate for the Government employee to collect and process the tip form is based on the average wage rate for a Management and Program Analyst, General Schedule (GS) Grade 11, Step 3, annual salary \$66,679. The processing and collecting of the tip data will occur in Vermont, thus the Burlington, VT average of locality pay of 16.18 percent is applied to the annual salary, \$66,679 (\$57,393 + 16.18 percent Burlington, VT locality). The average hourly wage rate is \$32.06 (\$66,679 / 2,080 hours worked per year).

The 2019 General Schedule Salary Table can be found at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2019/general-schedule/>

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

There is no program change or adjustment, this is a new 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.**

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.