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**PUBLIC SUBMISSION**

Comment Submitted by Bruce Grimm

Posted by the **U.S. Citizenship and Immigration Services** on Dec 26, 2021

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Comment

RE: Docket USCIS-2016-0004 OMB 1615-0137 FRN 2021-33635

As a way to signify the value that the Department of Homeland Security Office of Citizenship and Immigration places on relationships with customers, partners and stakeholders, it is important that this concept follows through while calculating and analyzing the burden and need for certain forms including the application for Employment Authorization for Abused Nonimmigrant Spouses (1-765V-USCIS).

Many government forms, including parts of this one, weigh heavily on people who need to use them, value their time and which are seen as an overall paperwork burden although necessary to comply with regulatory requirements. If this were an everyday filing rather than one that is used rarely or for a single business with the government reason, then this burden can be positively correlated with the size or scope of the need or business size.

Of course, the forms based approach is needed to analyze the 1-765V as it is a unique form which documents individual required authorizations and establishes a common framework to analyze and inform agency management decisions, strategic guidance and operational requirements. For those reasons, the form has a known performance and function which meets these and other factors.

The accuracy of estimates to complete the form should always include receiving, obtaining data for the questionnaire or input, reviewing for completeness and filing. These estimates of hours must be translated

to dollars to give a better picture of the overall impact of the users resources which can be difficult because of differences in respondent's culture, language, financial status and literacy. This form should be as basic as possible because when it is significantly less complex the less burden and higher compliance will be found.

Data quality is a pintchop of the agency itself at should be peer reviewed consistent with federal data quality guidelines. The general public usually would not know the usefulness of the 1-765V form or others like it since there is little grasp outside of respondents or their agents to how this data is used in the authorization process.

The total annualized burden for the application and reporting does seem reasonable but should continue to be analyzed or at least crondled with like gathering of information. This form and on going task of obtaining the information should be considered for approval.

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