

To: U.S. Citizenship and Immigration Services
CPSC Docket Number: USCIS-2008-0025-0090
Regarding: Agency Information Collection Activities: Application for Naturalization, Form N-400; Revision of a Currently Approved Collection
From: Effective Altruism Policy Analytics

Thank you for the opportunity to offer comment on Agency Information Collection Activities: Application for Naturalization, Form N-400; Revision of a Currently Approved Collection. We are pleased to offer analysis of the notice document.

For value of time calculations, average hourly wages are often used to measure opportunity cost both during and after work hours. Mean wages in the United States are \$14.62 per hour based on data from the Bureau of Labor Statistics¹. If this is consistent with respondent wages, the expected time cost of the form for respondents alone is \$95,272,721.

Attorney fees for assisting respondents with the N-400 form are often around \$800². This cost is only incurred by those who hire an attorney, and likewise the proposed change in the form will likely increase the number of attorneys hired. To come up with an hourly cost estimate for attorney support on the N-400 form, the hourly wages of legal occupations (occupation code 23-0000) were used from BLS data. Multiplying by a factor of 2 to account for benefits and overhead costs resulted in legal fees of \$64.42 per hour of assistance with the form¹.

Assuming the average attorney hiring respondent only hires an attorney for 1 hour of work, without other charges, it would only take less than 2.5 percent of respondents hiring an attorney for the form overall to surpass the Office of Management and Budget's threshold for economic significance, at \$100,000,000. With attorney fees of \$800, less than 0.2 percent of respondents (1 in 500 people) would have to hire a lawyer for the cost of the form to exceed the OMB's threshold. If 1 in 100 respondents hire an attorney at the \$800 rate, the total additional cost burden from attorney fees will be over \$6,000,000.

On the N-400 form, there are sections indicating that interpreters may help respondents fill out the form. According to BLS, interpreters and translators (occupation code 27-3091) make an average hourly wage of \$17.21 per hour¹. For those who require the assistance of an interpreter, it is likely that the time it takes to complete the form is longer than the average time USCIS estimated. Likewise, an interpreter is likely to help a respondent throughout the process of filling out a form, rather than just for a few parts of it. Of those eligible to naturalize, from 2000 to 2001, 60% had limited proficiency in the English language³. Likewise the demand for interpreters for filling out the N-400 form is likely to be high and should be accounted for. Assuming that time spent by volunteers is equal in value to the cost incurred by respondents that hire paid interpreters, if just 10 percent of respondents use interpreters the resulting additional cost would exceed \$11,000,000. This doesn't account for overhead, benefits, or the extra time it would take to complete the form.

In the notice, section (5) of *Overview of This Information Collection* states that the estimated hour burden per response is 6 hours and 55 minutes (6.917 hours). In a previous revision of Form N-400, posted on the Federal Register on March 20, 2013, the hour burden was the same: 6 hours and 55 minutes. The 2015 revision of the document includes

minor changes to the syntax of questions included in the previous version, but also extends the length of the application by six pages.

Time estimates for this application have been questionable in the past. USCIS-2008-0025-0031, posted Aug. 12, 2011, estimated that the time burden per respondent was 6 hours and 8 minutes. In USCIS-2008-0025-0037 posted Dec. 20, 2012, the revision more than doubled the length of the form from 10 to 21 pages but only increased the estimated burden by 47 minutes to 6 hours and 55 minutes per respondent. We believe holding over the 6 hour 55 minute estimate and presenting it in decimals overstates its accuracy, and recommend that the USCIS review its estimate of time burden per respondent, as it is critical in calculating the burden of cost for the collection of information.

Finally, regarding part (4) of the information requested of commenters, we believe the USCIS's work utilizing appropriate electronic means of information collection is only worsened with the lengthening of the revision to 27 pages. According to USCIS' estimated total number of respondents, applicants will print and mail 21,756,924 pages to USCIS offices around the country. This increases the paper waste by 4,834,872 pages. With printing costs of just \$0.085 per page⁴ this brings total expected printing costs to applicants to \$1,849,339. When added to the USCIS's time burden estimate of \$98,711,970, the cost is \$100,561,309: which is over the OMB's threshold for economic significance, without the need to account for the cost of legal assistance or interpreters.

Overall, we think USCIS' estimated cost burden of \$98,711,970 is too low and furthermore suspiciously close to OMB's threshold. The likely costs exceed the USCIS estimates by more than 10 million dollars. We propose that the form be shortened, by eliminating less relevant questions and white spaces. Further, we recommend that USCIS produce a version of the N-400 form which can be submitted online and allows online translation.

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[1]http://www.bls.gov/oes/current/naics3_624000.htm

[2]<http://www.hooyou.com/services/attorneyfee/attorney-fees.html>

[3]<http://webarchive.urban.org/publications/310847.html#figure4>

[4]http://www.staples.com/sbd/content/copyandprint/copiesanddocuments.html?cid=PS:GS:CP:CP:E:28:35613:staples_printing:1649821