

Department of Homeland Security
U.S. Citizenship & Immigration Services

Small Entity Analysis for the U.S. Citizenship and
Immigration Services Fee Schedule Final Rule

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Table of Contents

Table of Contents	1
Forms I-129, I-140, I-910, and I-360	3
Forms I-924, G-1041 and G-1041A.....	5
a. Petition for a Nonimmigrant Worker, Form I-129 Data	5
Research Population and Sampling Statistics	5
Discussion of Impacts	9
Issues with Data	11
b. Immigrant Petition for Alien Worker, Form I-140 Data.....	11
Research Population and Sampling Statistics	11
Discussion of Impacts	15
Issues with Data	15
Small Entity Classifications of Form I-129 and Form I-140	15
Cumulative Impact of Form I-129 and Form I-140	16
c. Civil Surgeon Designations, Form I-910 Data.....	17
Research Population and Sampling Statistics	17
Discussion of Impacts	20
d. Petition for Amerasian, Widow(er), or Special Immigrant, Form I-360.....	21
Research Population and Sampling Statistics	21
Discussion of Impacts	24
e. Genealogy Requests, Form G-1041 (Index Search Request) and Form G-1041A (Record Request)	25
f. Regional Center Designation Under the Immigrant Investor Program, Form I-924 and I-924A	26
Discussion of Impacts	27
Appendix A: SBA NAICS Size Standards for I-129, I-140, I-910 and I-360 Petitions in Sample Dataset	30
Appendix B: Form I-129 Sample with Petition Totals	40
Appendix C: Form I-140 Sample with Petition Totals	46
Appendix D: Form I-910 Sample with Petition Totals	51
Appendix E: Form I-360 Sample with Petition Totals.....	54

Introduction

The Department of Homeland Security's (DHS) U.S. Citizenship and Immigration Services (USCIS), as a U.S. Government agency primarily funded by user fees, periodically revisits whether its fees are adequate to appropriately fund its operations. In advance of a revision to the fees it levies, USCIS has reviewed the fees that would potentially affect small entities as defined by the U.S. Small Business Administration (SBA) guidelines and in accordance with the Regulatory Flexibility Act (RFA).

The term small entity means a small business, small organization, or small governmental jurisdiction.¹ The term "small business" has the same meaning as the term "small business concern" under section 3 of the Small Business Act, unless an agency, after consulting with the SBA's Office of Advocacy and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register.² In addition:

- A "small business":
 - is organized for profit,
 - has a place of business in the United States,
 - operates primarily within the United States or makes a significant contribution to the U.S. economy through payment of taxes or use of American products, materials, or labor,
 - is independently owned and operated, and
 - is not dominant in its field on a national basis.³

- A "small organization" is any not-for-profit enterprise that is independently owned and operated and not dominant in its field, unless an agency establishes, after opportunity for public comment, one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register.⁴

- A "small governmental jurisdiction" includes governments of cities, counties, towns, townships, villages, school districts, or special districts, with a population of less than 50,000, unless an agency establishes, after opportunity for public comment, one or more definitions of such term which are appropriate to the activities of the agency and which are based on such factors as location in rural or sparsely populated areas or limited revenues due to the population of such jurisdiction, and publishes such definition(s) in the Federal Register.⁵

¹ The RFA in a Nutshell, page 18: https://www.sba.gov/sites/default/files/advocacy/RFA_in_a_Nutshell2010.pdf.

² Ibid.

³ SBA small entity definition: The U.S. Small Business Administration operates in accordance with Public Law 85-536, called the "Small Business Act," (SBA) to help protect the interests of small businesses, strengthen the economy, and preserve free enterprise. The definition of a small business is available at <https://www.sba.gov/content/am-i-small-business-concern>.

⁴ The RFA in a Nutshell, p. 18.

⁵ Ibid.

According to SBA, for most industries a small business may be defined either in terms of the average number of employees over the past 12 months or the average annual receipts over the past 3 years.⁶

A majority of immigration benefit requests are submitted by individuals who do not meet the definition of “entity” under SBA rules. Entities affected by this rule are those that file and pay fees for certain immigration benefit requests on behalf of a foreign national. The petitions or applications filed by entities include the following:

- a. Petition for a Nonimmigrant Worker, Form I-129 – authorizes foreign workers for temporary employment, services, or to receive training in the United States.
- b. Immigrant Petition for Alien Worker, Form I-140 – authorizes foreign workers to become permanent residents in the United States.
- c. Application for Civil Surgeon Designation, Form I-910 – authorizes physicians to become designated providers of medical exams for individuals in the United States applying for immigration benefits with DHS.
- d. Petition for Amerasian, Widow(er), or Special Immigrant, Form I-360 – authorizes foreign workers for full time employment by a bona fide nonprofit religious organization in the United States.
- e. Genealogy Requests, Form G-1041 (Index Search Request) and Form G-1041A (Record Request).
- f. Application for Regional Center Designation Under the Immigrant Investor Program, Form I-924⁷ – authorizes designation as a Regional Center under the Immigrant Investor Program.

The goal of this review was to analyze the economic impact of fee changes by DHS on small entities. The forms mentioned above represent those entities that petition or file on behalf of individuals and therefore, were the focus of this analysis. Form I-129 and Form I-140 comprised the vast majority of the petitions applicable to this study. DHS also analyzed Forms I-910, I-360, G-1041, G-1041A, and I-924.

Sources and Sample Methodology

Forms I-129, I-140, I-910, and I-360

DHS obtained petitioner data filed for Forms I-129, I-140, I-910, and I-360 from internal databases for fiscal year 2017 (FY 2017), spanning from October 1, 2016 to September 31, 2017.⁸ This petitioner data included the employer firm name, city, state, ZIP code, employer identification number (EIN)⁹, number/type of filing, and petitioner or beneficiary name.

⁶ SBA has developed size standards to carry out the purposes of the Small Business Act and those size standards can be found in 13 CFR 121.201.

⁷ Supplemental Form I-924A, Annual Certification of Regional Center, is discussed further in this section also.

⁸ Source: DHS, USCIS, Office of Performance and Quality.

⁹ An Employer Identification Number (EIN) is a nine-digit number that U.S. Internal Revenue Service assigns in the following format: XX-XXXXXXX. It is used to identify the tax accounts of employers. Employer Identification Number, p 2. <https://www.irs.gov/pub/irs-pdf/p1635.pdf>.

DHS devised a methodology to conduct the small entity analysis based on a representative sample¹⁰ of the potentially impacted population. To create and test a sample, DHS followed this approach for each benefit request type:

- DHS aggregated a working database for each form type comprised of receipts from FY 2017.
- DHS identified unique EINs submitted with petitions and unique petitioner names from petitions that did not include an EIN.
- DHS used this list of unique identifiers as the population from which the sample was taken. DHS determined the sample size using a standard statistical formula of the population total for each form type with a 95 percent confidence level and a 5 percent confidence interval.¹¹
- DHS selected a random sample from the population by assigning a randomly generated identification (ID) number to each record.
- DHS then sorted the population so the entities with the smallest random ID numbers were selected as sample entities.

Filing data did not include information needed to classify the entity according to size standards, such as revenue or number of employees, so DHS used third party sources to obtain this information. For the analysis of the effects on Forms I-129, I-140, I-910 and I-360, DHS used several data sources to capture information on the characteristics of entities required to pay these fees.

- Hoover's online database of U.S. entities, a subscription service of Dun & Bradstreet
 - <http://www.hoovers.com/>
- Open-access (free) databases of public and private entities
 - <http://www.cortera.com/>
 - <http://www.manta.com/>
 - <http://www.guidestar.org/>

From these sources, DHS determined the North American Industry Classification System (NAICS) code,¹² revenue, and employee count for each entity in the sample. A list of NAICS codes for each entity matched in Forms I-129, I-140, I-910 and I-360 can be found in Appendix A, along with the SBA threshold for each industry cluster.¹³ In order to determine an entity's size, DHS first classified each entity by its NAICS code, and then used the SBA size standards to compare the requisite revenue or employee count threshold for each entity. Based on the NAICS code, some entities are classified as small based on their annual revenue and some based on the number of employees. In cases where the matched entity was a direct subsidiary, DHS recorded

¹⁰ DHS determined sample size using a standard statistical formula based on the population total for each form type with a 95 percent confidence level and a 5 percent confidence interval. This means that there is a 95 percent chance that parameters descriptive of the population (e.g. the percent of entities that are small) are no more than 5 percent different from the statistic obtained by the sample.

¹¹ This means that there is a 95 percent chance that parameters descriptive of the population (e.g., the percent of entities that are small) are no more than 5 percent different from the statistic obtained by the sample.

¹² U.S. Census Bureau, NAICS code listing: <http://www.census.gov/eos/www/naics/>.

¹³ SBA size standards effective October 2017. Visited April 2018. https://www.naics.com/wp-content/uploads/2017/10/SBA_Size_Standards_Table.pdf.

data for the parent organization. In cases where the entity was a single-location franchise, DHS recorded the single location's data.

Once as many entities as possible were matched, those that had relevant data were compared to the size standards provided by the SBA to determine whether they were small or not. Those that could not be matched or compared were assumed to be small under the presumption that non-small entities would have been identified by one of the databases at some point in their existence.

Forms I-924, G-1041 and G-1041A

Data for Forms I-924, G-1041 and G-1041A were treated differently than the data for Forms I-129, I-140, I-910 and I-360 in this analysis. Although applicant data for Forms I-924, G-1041 and G-1041A were available for analysis, issues in identifying entities and obtaining revenue and employee count due to the structure of these entities made it difficult to conduct a similar analysis. The structure of these entities and issues with data are discussed further in this analysis.

a. Petition for a Nonimmigrant Worker, Form I-129 Data

Research Population and Sampling Statistics

DHS collected internal data for Form I-129 were provided by the USCIS Office of Performance and Quality (OPQ) from the Computer-Linked Application Information Management System (CLAIMS3)/Citizenship and Immigration Services Common Operational Repository (CISCOR) database. There were 530,442 Form I-129 petitions submitted in FY 2017. Of these, 525,138 (99 percent) were submitted with an EIN, also known as a petitioner tax number; the remaining 5,304 were recorded with a blank or incomplete EIN field.

Many employers submitted more than one petition over the course of the year. Those petitions that were submitted with an EIN produced 90,726 unique EINs. DHS assumed that entities in the population without complete or with no EIN information could be small or not. These entities were removed before the sample was selected for this analysis.

Table 1 outlines total receipts or population (530,442 petitions) for Form I-129 from FY 2017 represented a population of 90,726 unique petitioners requesting foreign workers, with many of these entities submitting multiple petitions. From this population, DHS drew a random sample of 650 petitioning entities. Using the subscription or public-use databases identified previously, DHS assembled revenue and employment information on these entities and determined that 556, or 85.5 percent, of these petitioners met the definition of small entities. Of those that we determined could be classified as small entities, 71 percent¹⁴ had annual revenues of less than a million and approximately 9 percent¹⁵ of them had petitioned for five or more workers over that year.

¹⁴ Calculation: 395 small entities with annual revenues of less than \$1 million / 556 total small entities = 71 percent.

¹⁵ Calculation: 51 small entities petitioning for five or more workers / 556 total small entities = 9 percent.

Parameter	Quantity	Proportion of Sample (Percent)	Comments
Population—petitions	530,442	-	Total number of petitions.
Population—unique entities	90,726	-	Overstated number of unique employers.
Minimum Required Sample	384	-	Sample size necessary to achieve confidence goals.
Selected Sample	650	100.0	Sample selected to match 384 entities.
Non-matched Sample Segment (S)	<u>177</u>	27.2	Entities without data in Hoover's, Manta.com, Cortera.com., or Guidestar.org
Matched Sample Segment	473	72.8	Entities matched in Hoover's, et al, from 650 searches. This exceeds the established sample goal of 384.
Sub-Sample Missing Data (S)	<u>33</u>	5.1	Entities among the 473 matches lacking revenue or employee count data.
Matched Small Entities (S)	<u>346</u>	53.2	Entities among 473 matches considered small based on revenue or employee data.
Matched Non-small Entities	94	14.5	Number of non-small entities out of the 473 matches.
Number of small entities discovered in research	556	85.5	<u>177</u> + <u>33</u> + <u>346</u> = 556
Source: USCIS analysis.			

Within the sample in table 2, nearly 60 percent of entities had submitted just one petition in the 12-month timeframe; over 78 percent submitted only one or two petitions. At the other end of the scale, less than 8 percent of entities submitted more than 10 petitions.

Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
1	389	389	59.8	59.8
2	120	509	18.5	78.3
3	41	550	6.3	84.6
4	13	563	2.0	86.6
5	14	577	2.2	88.8
6	14	591	2.2	90.9
7	4	595	0.6	91.5
8	7	602	1.1	92.6
9	1	603	0.2	92.8
10 - 317	47	650	7.2	100.0
Total	650		100.0	

Table 2: Total Form I-129 Petitions per Entity, FY 2017.				
Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
Source: USCIS analysis.				

Table 3, details when small and non-small entities are treated separately, the distributions are different. More than 90 percent of identified or assumed small entities submitted four or fewer petitions, whereas only about 62 percent of non-small entities did. Looked at another way, submitting four or more petitions would put a company in the top 10 percent of most active small entities but by comparison, a non-small entity would have had to submit between 11 or more petitions to be in the top 10 percent of all petitioners. Although the petition counts per entity ranged from 1 to 317, the majority of small entities submitted only one petition while the majority of non-small entities submitted two or more petitions. While a large majority of the entities submitting petitions are considered small, most of these small entities file few petitions. A full table of petitions per sample entity is available in Appendix B.

Table 3: Form I-129 Petitions per Entity, Non-small and Small Distributions, FY 2017.						
Petitions per Entity	Non-small Entities			Small Entities		
	Entities	Percentage of Total	Cumulative Percentage	Entities	Percentage of Total	Cumulative Percentage
1	33	35.1	35.1	356	64.0	64.0
2	14	14.9	50.0	106	19.1	83.1
3	6	6.4	56.4	35	6.3	89.4
4	5	5.3	61.7	8	1.4	90.8
5	5	5.3	67.0	9	1.6	92.4
6 to 10	11	11.7	78.7	19	3.4	95.9
11 to 20	8	8.5	87.2	12	2.2	98.0
21 to 50	7	7.4	94.7	10	1.8	99.8
51+	5	5.3	100.0	1	0.2	100.0
Total	94	100.0		556	100.0	
Source: USCIS analysis.						

Table 4 shows the distribution of annual revenues of matched small entities in the sample is weighted toward the low end. The majority of these entities reported revenues of less than \$1 million per year and about three quarters brought in less than \$5 million. At the lowest end, a

little more than 18 percent of entities with records in Hoover’s and other databases had revenue of less than \$100,000 per year.¹⁶

Table 4: Form I-129 Revenue Distribution of Matched Small Entities, FY 2017.

Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< \$100K	64	1	65	18.8	18.8
\$100K to < \$500K	80	2	82	23.7	42.5
\$500K to < \$1M	35	2	37	10.7	53.2
\$1M to < \$5M	81	1	82	23.7	76.9
\$5M to < \$10M	29	1	30	8.7	85.5
\$10M to < \$50M	33	1	34	9.8	95.4
\$50M to < \$100M	5	0	5	1.4	96.8
>= \$100M	7	0	7	2.0	98.8
Missing revenue data*	4	0	4	1.2	100.0
Total	338	8	346	100.0	

Source: USCIS analysis.

*Some entities found in the databases either did not contain revenue data or were determined to be small based on employee count thresholds.

The plurality of petitioners in the sample were located in California, with 105 (or 16.2 percent of 650), followed by New York, Florida, Texas, and New Jersey. Together, these top five states accounted for 349 petitioners—more than half of the 650 sample, in Table 5.

Table 5: Form I-129 Geographic Distribution of Petitioners in Sample, Top 10 States, FY 2017.

Rank	State	Number of Petitioners	Proportion of Sample (Percentage)
1	California (CA)	105	16.2
2	New York (NY)	88	13.5
3	Florida (FL)	65	10.0
4	Texas (TX)	65	10.0
5	New Jersey (NJ)	26	4.0
6	Virginia (VA)	26	4.0
7	Georgia (GA)	23	3.5
8	Illinois (IL)	23	3.5
9	Massachusetts (MA)	20	3.1
10	Pennsylvania (PA)	18	2.8

Source: USCIS analysis.

¹⁶ Numbers reported in Hoover’s were point figures; Manta, Cortera, and Guidestar report wage ranges and thus, to estimate the number of small entities that maybe impacted, USCIS used the lower end of the wage range for this analysis.

Discussion of Impacts

DHS is separating Form I-129 into several forms each with its own fee. The current fee for Form I-129 is \$460. DHS is changing the following fees for new Forms I-129 (separated into new forms by worker type):

- Form I-129H1, Petition for Nonimmigrant Worker: H-1 Classifications - \$555
- Form I-129H2A, Petition for Nonimmigrant Worker: H-2A Classification
(Named Beneficiaries) - \$850
- Form I-129H2B, Petition for Nonimmigrant Worker: H-2B Classification
(Named Beneficiaries) - \$715
- Form I-129L, Petition for Nonimmigrant Worker: L Classification - \$805
- Form I-129O, Petition for Nonimmigrant Worker: O Classification - \$705
- Forms I-129CW, Petition for a CNMI-Only Nonimmigrant Transitional Worker;
I-129E&TN, Application for Nonimmigrant Worker: E or TN Classification; and
I-129MISC, Petition for Nonimmigrant Worker: H-3, P, Q, or R Classification -
\$695
- Form I-129H2A, Petition for Nonimmigrant Worker: H-2A Classification
(Unnamed Beneficiaries) - \$415
- Form I-129H2B, Petition for Nonimmigrant Worker: H-2B Classification
(Unnamed Beneficiaries) - \$385

For petitioners filing Form I-129 for H-2A and H-2B workers with unnamed beneficiaries, DHS is decreasing the fee. DHS is increasing the fee when the form is filed for all other worker types. The fee adjustments and percentage increases are summarized in Table 6.

Immigration Benefit Request	Current Fee	Final Fee	Difference Fee Increase/Decrease	Percent Change
Form I-129H1	\$460	\$555	\$95	21
Form I-129H2A – Named Beneficiaries	\$460	\$850	\$390	85
Form I-129H2A – Unnamed Beneficiaries	\$460	\$415	-\$45	-10
Form I-129H2B – Named Beneficiaries	\$460	\$715	\$255	55
Form I-129H2B – Unnamed Beneficiaries	\$460	\$385	-\$75	-16
Form I-129O	\$460	\$705	\$245	53
Form I-129L	\$460	\$805	\$345	75
Forms I-129CW, I-129E&TN, and I-129MISC	\$460	\$695	\$235	51

Source: USCIS FY 2019/2020 Final Fee Schedule (see preamble).

In order to calculate the impact of this increase, DHS estimated the total costs/cost savings associated with the final fee increase/decrease for each entity and divided that amount by the sales revenue of that entity.^{17, 18} Because entities can file multiple petitions, the analysis considers the number of petitions submitted by each entity. Based on the fee increases or decreases for Form I-129, this will amount to average impacts on all 346 small entities with revenue data as summarized in Table 7.

Immigration Benefit Request	Fee Increase / Decrease	Average Impact Percentage
Form I-129H1	\$95	0.15
Form I-129H2A – Named Beneficiaries	\$390	0.63
Form I-129H2A – Unnamed Beneficiaries	-\$45	-0.07
Form I-129H2B – Named Beneficiaries	\$255	0.41
Form I-129H2B – Unnamed Beneficiaries	-\$75	-0.12
Form I-129L	\$345	0.56
Form I-129O	\$245	0.40
Forms I-129CW, I-129E&TN, and I-129MISC	\$235	0.38

Source: USCIS calculation.

Entities that were considered small based on employee count with missing revenue data were excluded. Among the 346 small entities with reported revenue data, all experienced an economic impact of considerably less than 2 percent with the exception of 11 entities. Those 11 small entities with greater than a 2 percent impact filed multiple petitions and had a low reported revenue. Therefore, these small entities may file fewer petitions as a result of this rule. Depending on the immigration benefit request, the average impact on all 346 small entities with revenue data ranges from -0.12 to 0.63 percent as shown in Table 7. In other words, no matter which version of the newly separated Form I-129 is applicable, the absolute value of the average impact on the described 346 small entities is less than 1 percent. The evidence suggests that the

¹⁷ Total Impact to Entity = (Number of Petitions Submitted per Entity * Amount of Fee Increase/Decrease) / Entity Sales Revenue.

¹⁸ DHS used the lower end of the sales revenue range for those entities where ranges were provided.

changes in fees imposed by this rule do not represent a significant economic impact on these entities.

Issues with Data

In selecting a sample, DHS intends to be as inclusive as possible of all petitioners. However, due to peculiarities in the database, some petitioners would necessarily be entered multiple times in the random sort. Some of this is due to error. Some of these variations featured digits that were transposed and others mis-keyed, while other petitions for this entity were submitted without an EIN.

Manual data-cleaning is impractical in a situation where hundreds of thousands of records must be sorted; worse, it could lead to introducing new inaccuracy into the database if some duplicates are removed and others are not. Using employer names is not a better solution, as there is even less consistency in their formatting.

The data errors that may lead to overrepresentation of some petitioners do not clearly favor either small or non-small entities. The best DHS can do is to construct a sample larger than necessary, eliminate any duplicates within that sample, and proceed with the analysis as normal. There were no duplicates detected within the sample, indicating that irregularities in the data received were not large enough as to skew understanding of the underlying parameters of the petitioner population.

b. Immigrant Petition for Alien Worker, Form I-140 Data

Research Population and Sampling Statistics

USCIS internal data for Form I-140 were provided by OPQ from the CLAIMS3/CISCOR database. There were 139,439 foreign worker Form I-140 petitions submitted in FY 2017. Of these, 121,659 (87 percent) were submitted with an EIN; the remaining 17,780 were recorded either with a blank or a “0” in the EIN field. Many employers submitted more than one petition over the course of the year, as each petition is for an individual worker. Those petitions that were submitted with an EIN provided 30,321 unique EINs.

Table 8 has data from the 12-month period submissions of I-140 petitions were aggregated to create a total of 139,439 foreign worker petitions. This total represented a population of 30,321 entities petitioning for workers, with such entities submitting multiple petitions. From this population, DHS selected a random sample of 550 petitioning entities. Using the subscription or public-use databases identified previously, DHS assembled revenue and employment information on these entities and determined that 402, or 73.1 percent, of these petitioners met the definition of small entities, that over half of these small entities had annual

revenues of less than \$5 million¹⁹, and that approximately 7.5 percent²⁰ of them had petitioned for 5 or more workers over that year.

Table 8: Outline of Form I-140 Statistics, FY 2017.

Parameter	Quantity	Proportion of Sample (Percentage)	Comments
Population—petitions	139,439	-	Total number of petitions.
Population—unique entities	30,321	-	Overstated number of unique employers.
Minimum Required Sample	383	-	Sample size necessary to achieve confidence goals.
Selected Sample	550	100.0	Sample selected to match 383 entities.
Non-matched Sample Segment (S)	<u>70</u>	12.7	Entities without data in Hoover’s, Manta.com, Cortera.com., or Guidestar.org
Matched Sample Segment	480	87.4	Entities matched in Hoover’s, et al, from 550 searches. This exceeds the established sample goal of 383.
Sub-Sample Missing Data (S)	<u>8</u>	1.4	Entities among the 480 matches lacking revenue or employee count data.
Matched Small Entities (S)	<u>324</u>	59.0	Entities among 480 matches considered small based on revenue or employee data.
Matched Non-small Entities	148	27.0	Number of non-small entities out of the 480 matches.
Number of small entities discovered in research	402	73.1	<u>324</u> + <u>8</u> + <u>70</u> = 402

Source: USCIS analysis.

Within the sample, nearly two-thirds of entities had submitted just one petition in the 12-month timeframe; over 76 percent—very close to the proportion of small entities—submitted only 1 or 2 petitions. At the other end of the scale, less than 5 percent of entities submitted 10 or more petitions, in table 9.

Table 9: Total Form I-140 Petitions per Entity, FY 2017.

Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
1	345	345	62.7	62.7
2	74	419	13.5	76.2
3	40	459	7.3	83.5
4	20	479	3.6	87.1
5	17	496	3.1	90.2
6	10	506	1.8	92.0
7	11	517	2.0	94.0
8	4	521	0.7	94.7
9	4	525	0.7	95.5

¹⁹ Calculation: 238 small entities with annual revenues of less than \$5 million/ 402 total small entities = 59 percent.

²⁰ Calculation: 30 small entities petitioning for five or more workers / 402 total small entities = 7.5 percent.

Table 9: Total Form I-140 Petitions per Entity, FY 2017.				
Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
10 - 59	25	550	4.5	100.0
Total	550		100.0	

Source: USCIS analysis.

When small and non-small entities are treated separately, the distributions are different. More than 90 percent of identified or assumed small entities submitted 4 or fewer petitions, whereas only about 72 percent of non-small entities did. Looked at another way, submitting 4 or more petitions would put a company in the top 10 percent of most active small entities but by comparison a non-small entity would have to have submitted between 6 to 10 or more petitions to be in the top 10 percent of petitioners. Although the number of petition counts per entity ranged from 1 to 97, the majority of small entities submitted only one petition. This leads DHS to believe that most of the small entities file fewer petitions, in table 10. A full table of petitions per sample entity is available in Appendix C.

Table 10: Form I-140 Petitions per Entity, Non-small and Small, FY 2017.						
Petitions per Entity	Non-small Entities			Small Entities		
	Entities	Percentage of Total	Cumulative Percentage	Entities	Percentage of Total	Cumulative Percentage
1	55	37.2	37.2	290	72.1	72.1
2	25	16.9	54.1	49	12.2	84.3
3	18	12.2	66.2	22	5.5	89.8
4	9	6.1	72.3	11	2.7	92.5
5	10	6.8	79.1	7	1.7	93.9
6 to 10	17	11.5	90.5	14	3.5	97.4
11 to 20	6	4.1	94.6	7	1.7	99.4
21 to 50	4	2.7	97.3	1	0.2	99.8
51+	4	2.7	100.0	1	0.2	100.0
Total	148	100.0		402	100.0	

Source: USCIS analysis.

Table 11 shows the distribution of annual revenues of matched small entities in the sample is weighted toward the low end. The majority of these entities reported revenues of less than \$5 million per year and about two thirds brought in less than \$10 million. At the lowest end, about 29 percent of the firms with revenue records in Hoover's and other databases had revenue of less than \$500,000 per year.²¹

²¹ Numbers reported in Hoover's were point figures; Cortera, Manta, and Guidestar report wages and ranges and thus, USCIS used the lower end of the wage range for this analysis.

Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< \$100K	39	0	39	12.0	12.0
\$100K to < \$500K	78	1	79	24.4	36.4
\$500K to < \$1M	39	2	41	12.7	49.1
\$1M to < \$5M	64	2	66	20.4	69.4
\$5M to < \$10M	37	0	37	11.4	80.9
\$10M to < \$50M	38	1	39	12.0	92.9
\$50M to < \$100M	9	0	9	2.8	95.7
>= \$100M	13	0	13	4.0	99.7
Missing revenue data*	1	0	1	0.3	100.0
Total	318**	6	324	100.0	

Source: USCIS analysis.
 *Some entities found in the databases either did not contain revenue data or were determined to be small based on employee count thresholds.

The plurality of petitioners in the sample were submitted by businesses in California, with 121 (or 22.0 percent of 550 total petitioners), followed by Texas, Florida, New York, and New Jersey. Together, these top five states accounted for 309 petitioners—more than half of the sample.

Rank	State	Number of Petitioners	Proportion of Sample (Percentage)
1	California (CA)	121	22.0
2	Texas (TX)	58	10.5
3	Florida (FL)	45	8.2
4	New York (NY)	43	7.8
5	New Jersey (NJ)	42	7.6
6	Illinois (IL)	24	4.4
7	Virginia (VA)	21	3.8
8	Georgia (GA)	19	3.5
9	Mississippi (MI)	16	2.9
10	Massachusetts (MA)	15	2.7

Source: USCIS analysis.

Discussion of Impacts

USCIS is decreasing the fee for Form I-140 to \$555, a decrease of \$145 (21 percent). Current fees for this form are \$700, meaning the decrease will remove \$145 in fees per petition. In order to calculate the impact of this decrease, USCIS estimated the total cost savings associated with the fee decrease for each entity and divided that amount by the sales revenue of that entity.^{22,23} Because entities can file multiple petitions, the analysis considers the number of petitions submitted by each entity. Entities that were considered small based on employee count with missing revenue data were excluded. Among the 324 small entities with reported revenue data, all entities experienced an economic impact considerably less than -2 percent. As a result of the fee decrease, these small entities will see a cost savings (\$145 per petition) in filing fees based on petitions. The higher the negative will have the greatest economic impact imposed by this fee change totaled -1.74 percent and the smallest totaled -0.00000006 percent, resulting in a cost savings. The negative number represents cost savings to the petitioner. Therefore, the larger it is, the greater the cost savings for the petitioners. The average impact on all 324 small entities with revenue data was -0.06 percent. The evidence suggests that the decreased fee does not represent a significant economic impact on these entities.

Issues with Data

DHS attempted to be as inclusive as possible of all petitioners that filed Form I-140. However, the database contained some submitted petitions where the EIN number was left blank or “0.” Instructions for Form I-140 state that except for foreign workers of extraordinary ability or those petitioning under national interest waivers, all other Form I-140 petitions must require proof of a permanent job offer. Therefore, an EIN number must be coded on the form or it will be rejected. The blanks in the database could trace to these beneficiaries or not, many of those petitions submitted with a blank or “0” EIN did not provide an entity name. Manual data-cleaning was again impractical in a situation where thousands of records must be sorted.

The sample constructed was larger than necessary, weeding out any duplicates within that sample. There were no duplicates detected within the sample, indicating that irregularities in the data received were not large enough as to skew understanding of the underlying parameters of the petitioner population.

Small Entity Classifications of Form I-129 and Form I-140

With an aggregated total of 556 out of a sample size of 650, DHS inferred that a majority, or 85.5 percent, of the entities filing Form I-129 petitions were small entities. Table 13 shows the composition of the small entities by entity type. Most of the sample consisted of small businesses when looked at by type of small entity. There are 4 small governmental jurisdictions in the sample and 41 small not-for-profits.

²² Total Impact to Entity = (Number of Petitions Submitted per Entity * Amount of Fee Increase/Decrease) / Entity Sales Revenue.

²³ USCIS used the lower end of the sales revenue range for those entities where ranges were provided.

Table 13: Form I-129 Small Entity Classification, FY 2017.			
Classification	Small Entity Status	Sample Size	Sample Size (Percentage)
Small Entity	Yes	556	85.5
Small not-for-profit entity	Segment	41	-
Small governmental jurisdiction	Segment	4	-
Small business	Segment	511	-
Non-small Entities	No	94	14.5
Total	-	650	100.0
Source: USCIS analysis.			

With an aggregated total of 402 out of a sample size of 550, DHS inferred that a majority, or 73.1 percent, of the entities filing Form I-140 petitions were small entities. Table 14 shows the composition of the small entities by type. Similar to the Form I-129 small entity types, the sample of Form I-140 consisted mainly of small businesses, with no small governmental jurisdictions in the sample and 6 small not-for-profits.

Table 14: Form I-140 Small Entity Classification, FY 2017.			
Classification	Small Entity Status	Sample Size	Sample Size (Percentage)
Small Entity	Yes	402	73.1
Small not-for-profit entity	Segment	6	-
Small governmental jurisdiction	Segment	0	-
Small business	Segment	396	-
Non-small Entities	No	148	26.9
Total	-	550	100.0
Source: USCIS analysis.			

Cumulative Impact of Form I-129 and Form I-140

In addition to the individual Form I-129 and Form I-140 analyses, USCIS analyzed any cumulative impacts of these form types to determine if there were any impacts to small entities when analyzed together. USCIS isolated those entities that overlapped in both samples of Forms I-129 and I-140 by EIN. Only 1 entity had an EIN that overlapped in both samples; this was a small entity that submitted 3 Form I-129 petitions and 1 Form I-140 petition. Due to little overlap in entities in the samples and the relatively minor impacts on revenue of fee increases of Forms I-129 and I-140, USCIS does not expect the combined impact of these two forms to be an economically significant burden on a substantial number of small entities.

Table 15: Entities in Both Form I-129 and Form I-140 Samples, FY 2017.			
Entity	Number of Form I-129 Petitions	Number of Form I-140 Petitions	Small Entity Status
Overlapping Sample Entity	3	1	Small
Source: USCIS analysis.			

c. Application for Civil Surgeon Designation, Form I-910 Data

Research Population and Sampling Statistics

By law, a civil surgeon is a physician designated by USCIS to conduct immigration medical examinations for individuals applying for an immigration benefit in the United States. Form I-910 is used by a physician to request that USCIS designate him or her as a civil surgeon to perform immigration medical examinations in the United States and complete USCIS Form I-693, Report of Medical Examination and Vaccination Record.

USCIS internal data for submissions of Form I-910 were provided by the USCIS National Benefits Center from the National Processing Workflow Repository for FY 2017. These applications contain many duplicates as an individual can apply for multiple clinic practices and a practice can have multiple individual applicants. There were 476 distinct entities identified based on medical license entries and 433 individual doctors associated with these requests.

Table 16, as with the employee petitions described for Form I-129 and Form I-140, DHS selected a random sample of 300 entities and successfully matched 266 of those entities, exceeding the sample-accuracy threshold of 213.²⁴ In the sample, 189 entities matched and were considered small, 47 entities were found in the databases but did not provide applicable revenue or employee count data, and 30 entities were considered non-small. The remaining 34 entities were not found in any of the databases. From the revenue and employment information on these entities, we determined that 270, or 90 percent, of the applicants met the definition of small entities, that over half of these small entities had annual revenues of less than \$1 million,²⁵ and that approximately 4 percent of them had requested a civil surgeon designation for 3 or more of their employee doctors over that year.²⁶

²⁴ To accurately characterize a population of 476 entities, a sample of 213 entities is required to project findings on the population with a 95 percent confidence level and a 5 percent confidence interval.

²⁵ Calculation: 155 small entities with revenue less than \$1 million / 270 total small entities = 57.8 percent.

²⁶ Calculation: 12 small entities petitioned for 3 or more workers / 270 total small entities = 4.4 percent.

Table 16: Outline of Form I-910 Statistics, FY 2017.			
Parameter	Quantity	Proportion of Population (Percentage)	Comments
Population—applications	757		Total number of applications.
Population—unique entities	476		Unique entities submitting applications.
Minimum Required Sample	213	-	Sample size necessary to achieve confidence goals.
Selected Sample	300	100.0	Sample selected to match 213 entities.
Non-matched Entities (S)	<u>34</u>	11.3	Entities without data in Hoover's, Manta.com, Cortera.com., or Guidestar.org
Matched Entities	266	88.7	Entities matched in all databases.
Sub-Sample Missing Data (S)	<u>47</u>	15.7	Entities among the 266 matches lacking revenue or employee count data. *
Matched Small Entities (S)	<u>189</u>	63.0	Entities among 266 matches considered small based on revenue or employee data.
Matched Non-small Entities	30	10.0	Number of non-small entities out of the 266 matches.
Number of small entities discovered in research	270	90.0	<u>34</u> + <u>47</u> + <u>189</u> = 270
Source: USCIS analysis.			
*Includes 2 local government jurisdictions.			

Within the sample, 85.3 percent of entities had submitted just one request in the 12-month timeframe; over 95 percent of entities submitted only 1 or 2 requests. At the other end of the scale, only about 1 percent of entities submitted more than 4 petitions.

Table 17: Total Form I-910 Petitions per Entity, FY 2017.				
Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
1	256	256	85.3	85.3
2	31	287	10.3	95.6
3	6	293	2.0	97.6
4	4	297	1.3	98.9
5	1	298	0.3	99.2
6	0	0	0.0	99.2
7	0	0	0.0	99.2
8	0	0	0.0	99.2
9	2	300	0.8	100.0
Total	300		100.0	
Source: USCIS analysis.				

When small and non-small entities are treated separately, the distributions are similar. However, those entities identified or assumed to be small were more likely to submit multiple requests per entity, whereas those entities identified as non-small only submitted two or fewer requests per entity. A full table of requests for civil surgeon designations per sample entity is available in Appendix D.

Table 18: Form I-910 Petitions per Entity, Non-small and Small, FY 2017.

Petitions per Entity	Non-small Entities			Small Entities		
	Entities	Percentage of Total	Cumulative Percentage	Entities	Percentage of Total	Cumulative Percentage
1	25	83.4	83.4	231	85.7	85.7
2	4	13.3	96.7	27	10.0	95.7
3	0	0	96.7	6	2.2	97.9
4	0	0	96.7	4	1.5	99.4
5	0	0	96.7	1	0.3	99.7
6	0	0	96.7	0	0.0	99.7
7	0	0	96.7	0	0.0	99.7
8	0	0	96.7	0	0.0	99.7
9	1	3.3	100.0	1	0.3	100.0
Total	30	100.0		270	100.0	

Source: USCIS analysis.

Among small entities in the population, revenues were generally lower than in the Form I-129 and Form I-140 samples; nearly 82 percent of applicants reported less than 1 million dollars in revenue. Only 4 entities (about 2 percent) made over \$10 million in revenue.

Table 19: Form I-910 Revenue Distribution of Matched Small Entities, FY 2017.

Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< \$100K	26	5	31	16.4	16.4
\$100K to < \$500K	82	8	90	47.6	64.0
\$500K to < \$1M	23	11	34	18.0	82.0
\$1M to < \$5M	20	6	26	13.8	95.8
\$5M to < \$10M	4	0	4	2.1	97.9
\$10M to < \$50M	4	0	4	2.1	100.0
\$50M to < \$100M	0	0	0	0.0	100.0
>= \$100M	0	0	0	0.0	100.0
Missing revenue data	0	0	0	0.0	100.0

Table 19: Form I-910 Revenue Distribution of Matched Small Entities, FY 2017.					
Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
Total	159	30	189	100.0	

Source: USCIS analysis.

The plurality of petitioners (table 20) in the sample were submitted by businesses in Florida, with 42 (or 14.0 percent of 300 total requesters/applicants), followed by New York, California, Texas, and New Jersey. Together, these top five states accounted for 176 applicants— as with the Forms I-129 and I-140 petitions more than half of the sample.

Table 20: Form I-910 Geographic Distribution of Petitioners in Sample, Top 10 States, FY 2017.			
Rank	State	Number of Petitioners	Proportion of Sample
1	Florida (FL)	42	14.0
2	New York (NY)	40	13.3
3	California (CA)	36	12.0
4	Texas (TX)	34	11.3
5	New Jersey (NJ)	24	8.0
6	Illinois (IL)	19	6.3
7	Virginia (VA)	9	3.0
8	Pennsylvania (PA)	8	2.7
9	Georgia (GA)	7	2.3
10	Maryland (MD)	7	2.3

Source: USCIS analysis.

Discussion of Impacts

USCIS is decreasing the fee for Form I-910 to \$635, a decrease of \$150 (19 percent) from the current \$785 fee. In order to calculate the economic impact of this decrease, USCIS estimated the total cost savings associated with the fee decrease for each entity and divided that amount by the sales revenue of that entity.^{27, 28} Because entities can file multiple requests, the analysis considers the number of requests submitted by each entity. Entities that were considered small based on employee count with missing revenue data were excluded. Among the 189 small entities with reported revenue data, all experienced an economic impact considerably less than 1 percent. As a result of the fee decrease, these small entities will see a cost savings (\$150 per application) in filing fees based on application. The greatest economic impact by this fee change totaled -1.50 percent and the smallest totaled -0.001 percent. The average impact on all 189 small entities with revenue data was -0.116 percent. The higher the negative number would produce a greater cost savings for the applicants. The negative number

²⁷ Total Impact to Entity = (Number of Petitions Submitted per Entity * -\$150) / Entity Sales Revenue.
²⁸ USCIS used the lower end of the sales revenue range for those entities where ranges were provided.

represents cost savings to the applicant. Therefore, the larger it is, the greater the cost savings for the applicants. The evidence suggests that the decreased fee does not represent a significant economic impact on these entities.

d. Petition for Amerasian, Widow(er), or Special Immigrant, Form I-360

Research Population and Sampling Statistics

USCIS collected internal data for Form I-360 for religious workers were provided by the OPQ from the CLAIMS3/CISCOR database. There were 2,446 religious foreign worker Form I-360 petitions submitted in FY 2017 by 760 unique entities with such entities submitting multiple petitions. Of these 760 unique entities, DHS selected a random sample of 420 petitioning entities to analyze. In the sample using the subscription or public-use databases identified previously, 309 entities matched and were considered small, 74 entities were found in the databases but did not provide applicable revenue or employee count data. The remaining 5 entities were not found in any of the databases. Using the subscription or public-use databases identified previously, DHS assembled revenue and employment information on these entities and determined that 388, or 92.4 percent, of these petitioners met the definition of small entities, that over half of these small entities had annual revenues of less than \$5 million²⁹, and that approximately 3 percent³⁰ of them had petitioned for 5 or more foreign workers over that year, in table 21.

Table 21: Outline of Form I-360 Statistics, FY 2017.			
Parameter	Quantity	Proportion of Population	Comments
Population—petitions	2,446	-	Total number of petitions.
Population—unique entities	760	-	Overstated number of unique employers.
Minimum Required Sample	332	-	Sample size necessary to achieve confidence goals.
Selected Sample	420	100.0	Sample selected to match 332 entities.
Non-matched Sample Segment (S)	<u>5</u>	1.2	Entities without data in Hoover's, Manta.com, Cortera.com, or Guidestar.org
Matched Sample Segment	415	98.8	Entities matched in Hoover's, et al, from 420 searches. This exceeds the established sample goal of 332.
Sub-Sample Missing Data (S)	<u>74</u>	17.6	Entities among the 415 matches lacking revenue or employee count data.
Matched Small Entities (S)	<u>309</u>	73.6	Entities among 415 matches considered small based on revenue or employee data.

²⁹ Calculation: 236 small entities with annual revenues of less than \$1 million/ 388 total small entities = 61 percent.

³⁰ Calculation: 11 small entities petitioning for five or more workers / 388 total small entities = 3 percent.

Table 21: Outline of Form I-360 Statistics, FY 2017.			
Parameter	Quantity	Proportion of Population	Comments
Matched Non-small Entities	32	7.6	Number of non-small entities out of the 415 matches.
Number of small entities discovered in research	388	92.4	<u>309</u> + <u>74</u> + <u>5</u> = 388
Source: USCIS analysis.			

Within the sample in table 22, nearly 79 percent of entities had submitted just one petition in the 12-month timeframe; over 89 percent entities submitted only one or two petitions. At the other end of the scale, less than 3 percent of entities submitted more than 4 petitions. The average filings per entity are estimated to be 1.5 petitions.³¹

Table 22: Total Form I-360 Petitions per Entity, FY 2017.				
Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
1	331	331	78.8%	78.8%
2	46	377	89.8%	11.0%
3	24	401	95.5%	5.7%
4	8	409	97.4%	1.9%
5	4	413	98.3%	1.0%
6	3	416	99.0%	0.7%
7	1	417	99.3%	0.2%
8	1	418	99.5%	0.2%
9+	2	420	100.0%	0.5%
Total	420		100.0	
Source: USCIS analysis.				

Below in table 23, when small and non-small entities are treated separately, the distributions are very different. Those entities identified or assumed to be small were much more likely to submit fewer petitions per entity (approximately 81 percent of entities only submitted 1 petition), compared to approximately 81 percent of entities identified as non-small submitted four or more petitions per entity. A full table of petitions per sample entity is available in Appendix E.

³¹ USCIS calculated the average filing per entity of 1.5 petitions, from the Form I-360 Sample with Petition Totals in Appendix E, of this analysis. Calculation: (total number of petitions from each sample id) / (total number of sample Form I-360 petitions) = 618/420 = 1.5 average petitions filed per entity.

Petitions per Entity	Non-small Entities			Small Entities		
	Entities	Percentage of Total	Cumulative Percentage	Entities	Percentage of Total	Cumulative Percentage
1	15	46.9	46.9	316	81.4	81.4
2	5	15.6	62.5	41	10.6	92.0
3	4	12.5	75.0	20	5.2	97.2
4	2	6.3	81.3	6	1.5	98.7
5	1	3.1	84.4	3	0.8	99.5
6	3	9.4	93.8	0	0.0	99.5
7	0	-	93.8	1	0.3	99.7
8	0	-	93.8	1	0.3	100.0
9+	2	6.3	100.0	0	0.0	-
Total	32	100.0		388	100.0	

Source: USCIS analysis.

Among small entities in the population, revenues were generally lower than in the Form I-129 and Form I-140 samples; nearly 90 percent of applicants reported less than \$5 million in revenue. Only 3 entities (about 1 percent) made over \$10 million in revenue.

Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< \$100K	69	7	76	24.6	24.6
\$100K to < \$500K	102	5	107	34.6	59.2
\$500K to < \$1M	34	2	36	11.7	70.9
\$1M to < \$5M	51	7	58	18.8	89.7
\$5M to < \$10M	15	0	15	4.9	94.6
\$10M to < \$50M	2	0	2	0.6	95.2
\$50M to < \$100M	1	0	1	0.3	95.5
>= \$100M	0	0	0	0.0	95.5
Missing revenue data	3	11	14	4.5	100.0
Total	277	32	309	100.0	

Source: USCIS analysis.

The plurality of petitions in the sample were submitted by businesses in California, with 80 (or 19.0 percent of 420 entities), followed by New York, Texas, Florida and New Jersey. As

with the I-129 and I-140 petitions, these top five states accounted for 198 petitions, which is nearly half of the sample (47.1 percent of 420 total petitions).

Table 25: Form I-360 Geographic Distribution of Petitioners in Sample, Top 10 States, FY 2017.

Rank	State	Number of Petitioners	Proportion of Sample
1	California (CA)	80	19.0
2	New York (NY)	45	10.7
3	Texas (TX)	32	7.6
4	Florida (FL)	21	5.0
5	New Jersey (NJ)	20	4.8
6	Massachusetts (MA)	19	4.5
7	Georgia (GA)	18	4.3
8	Illinois (IL)	18	4.3
9	Pennsylvania (PA)	15	3.6
10	Ohio (OH)	14	3.3

Source: USCIS analysis.

Discussion of Impacts

USCIS is increasing the fee for petitioners who file Form I-360 from \$435 to \$450, a \$15 (4 percent), including entities who petitions on behalf of foreign religious workers. In order to calculate the impact of the increase, DHS estimated the total costs associated with the fee increase for each entity and divided that amount by the sales revenue of that entity.^{32, 33}

Similar to Forms I-129, I-140, and I-910, DHS estimated the total costs associated with the fee increase for each entity. Among the 309 small entities with reported revenue data, all experienced an economic impact considerably less than 1.0 percent. The greatest economic impact imposed by this fee change totaled 0.35 percent and the smallest totaled 0.000002 percent. The average impact on all 309 small entities with revenue data was 0.01 percent.

DHS also analyzed the costs of the final rule on the petitioning entities relative to the costs of the typical employee’s salary. Guidelines suggested by the SBA Office of Advocacy indicate that the impact of a rule could be significant if the cost of the regulation exceeds 5 percent of the labor costs of the entities in the sector.³⁴ According to the Bureau of Labor

³² Total Impact to Entity = (Number of Petitions Submitted per Entity * \$15) / Entity Sales Revenue.

³³ USCIS used the lower end of the sales revenue range for those entities where ranges were provided.

³⁴ Office of Advocacy, Small Business Administration, “A Guide for Government Agencies, How to Comply with the Regulatory Flexibility Act”, page 19: <https://www.sba.gov/sites/default/files/advocacy/How-to-Comply-with-the-RFA-WEB.pdf>

Statistics (BLS), the mean annual salary is \$53,290 for clergy,³⁵ \$46,980 for directors of religious activities and education,³⁶ and \$35,860 for other religious workers.³⁷ Based on an average of 1.5 religious workers³⁸ petitioned-for per entity, the additional average annual cost will be \$22 per entity.³⁹ The additional costs per entity in this rule represents only 0.04 percent of the average annual salary for clergy, 0.05 percent of the average annual salary for directors of religious activities and education, and 0.06 percent of the average annual salary for all other religious workers.⁴⁰ Therefore, using average annual labor cost guidelines, the additional regulatory compliance costs in this final rule are not significant.

e. Genealogy Requests, Form G-1041 (Index Search Request) and Form G-1041A (Record Request)

In this final rule, DHS establishes a fee for the Genealogy Index Search Request, Form G-1041 to increase from \$65 to \$170, an increase of \$105 (162 percent) for those who mail in this request on paper. This rule increases the fee for requestors who use the online electronic Form G-1041 version from the current \$65 to \$160, an increase of \$95 (146 percent).

In this final rule, DHS establishes a fee for Form G-1041A would increase from \$65 to \$265, an increase of \$200 (308 percent) for those who mail in this request on paper. In this rule, requestors who use the online electronic Form G-1041A will pay from the current \$65 to \$255, an increase of \$190 (292 percent).

Based on DHS records in Table 26, an average of 3,840 requests were made annually for an index search and an average of 2,152 records requests were made annually over the 5 calendar year span of 2013 to 2017. DHS does not have sufficient data on the requestors for the genealogy forms to determine if entities or individuals submitted these requests. The case management tracking system used by DHS for genealogy requests does not allow for requester's data to be readily pulled.

³⁵ Bureau of Labor Statistics, U.S. Department of Labor, "Occupational Employment Statistics, May 2018, "Clergy": <https://www.bls.gov/oes/2018/may/oes212011.htm>.

³⁶ Bureau of Labor Statistics, U.S. Department of Labor, "Occupational Employment Statistics, May 2018, "Directors of Religious Activities and Education": <https://www.bls.gov/oes/2018/may/oes212021.htm>.

³⁷ Bureau of Labor Statistics, U.S. Department of Labor, "Occupational Employment Statistics, May 2018, "Religious Workers, All Other": <https://www.bls.gov/oes/2018/may/oes212099.htm>.

³⁸ USCIS calculated the average filing per entity of 1.5 petitions, from the Form I-360 Sample with Petition Totals in Appendix E of this analysis. Calculation: (total number of petitions from each sample id) / (total number of sample Form I-360 petitions) = 618/420 = 1.5 average petitions filed per entity.

³⁹ Calculation: 1.5 average petitions per entity * \$15 increase in petition fees = approximately \$22 additional total cost per entity.

⁴⁰ Calculation: (\$22 per entity / \$53,290 clergy salary) x 100 = .04 percent;
(\$22 per entity / \$46,980 directors of religious activities and education) x 100 = .05 percent;
(\$22 per entity / \$35,860 other religious workers) x 100 = .06 percent.

Table 26: USCIS Genealogy Form Receipts (Calendar Year), 2015 – 2017.							
Form Type	2013	2014	2015	2016	2017	5-year Total	5 – year Average
Genealogy Index Search Request, Form G-1041	3,662	4,167	4,897	3,164	3,310	19,200	3,840
Genealogy Records Request, Form G-1041A	2,219	2,036	2,344	1,534	2,626	10,759	2,152

Source: DHS, USCIS, Immigration Records and Identity Services (IRIS) Directorate, Records Information Systems Branch (RISB).

DHS has previously determined that requests for historical records are usually made by individuals.⁴¹ If professional genealogists and researchers submitted such requests in the past, they did not identify themselves as commercial requesters and therefore could not be separated within the data. Genealogists typically advise clients on how to submit their own requests. For those that submit requests on behalf of clients, DHS does not know the extent to which they can pass along the fee increases to their individual clients. Therefore, DHS does not currently have sufficient data to definitively assess the impact on small entities for these requests. However, DHS must still recover the full costs of this program. As stated in the preamble to this rule, reducing the filing fee for any one benefit request submitted to DHS simply transfers the additional cost to process this request to other immigration and naturalization filing fees.

For this final rule, DHS is expanding the use of electronic genealogy requests to encourage requesters to use the electronic versions of Form G-1041 and Form G-1041A. DHS is also changing the search request process so that USCIS may provide requesters with electronic records, if they exist, in response to the initial index request. These changes may reduce the time it takes to request and receive genealogy records, and, in some cases, it will eliminate the need to make multiple search requests and submit separate fees. Moreover, DHS notes that providing digital records in response to a Form G-1041 request may reduce the number of Form G-1041A requests that will be filed since there would already be a copy of the record if it was previously digitized. DHS recognizes that some small entities may be impacted by these proposed increased fees but cannot determine how many or the exact impact.

f. Regional Center Designation Under the Immigrant Investor Program, Form I-924 and I-924A

As part of the Immigration Act of 1990, Public Law 101-649, 104 Stat. 4978, Congress established the EB-5 immigrant visa classification to incentivize employment creation in the United States. Under the EB-5 program, lawful permanent resident (LPR) status is available to foreign nationals who invest the required amount in a new commercial enterprise (NCE) that will create at least 10 full-time jobs in the United States. *See* INA section 203(b)(5), 8 U.S.C.

⁴¹ See “Establishment of a Genealogy Program; Proposed Rule,” 71 FR 20357 – 20368 (April 20, 2006). Available at: <https://www.regulations.gov/document?D=USCIS-2006-0013-0001>.

1153(b)(5). A foreign national may also invest a lower amount in a targeted employment area (TEA), defined to include rural areas and areas of high unemployment. *Id.*; 8 CFR 204.6(f). The INA allots 9,940 immigrant visas each fiscal year for foreign nationals seeking to enter the United States under the EB-5 classification.⁴² See INA section 201(d), 8 U.S.C. 1151(d); INA section 203(b)(5), 8 U.S.C. 1153(b)(5). Not less than 3,000 of these visas must be reserved for foreign nationals investing in TEAs. See INA section 203(b)(5)(B), 8 U.S.C. 1153(b)(5)(B).

Enacted in 1992, section 610 of the Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Public Law 102-395, 106 Stat. 1828 (Oct. 6, 1992), established a pilot program that requires the allocation of a limited number of EB-5 immigrant visas to individuals who invest through DHS-designated regional centers.⁴³ Under the Regional Center Program, foreign nationals based their EB-5 petitions on investments in new commercial enterprises located within “regional centers.” DHS regulations define a regional center as an economic unit, public or private, that promotes economic growth, regional productivity, job creation, and increased domestic capital investment. See 8 CFR 204.6(e). As of August 12, 2019, there are 826 USCIS-approved Regional Centers.⁴⁴ Requests for regional center designation must be filed with USCIS on Form I-924, Application for Regional Center Designation Under the Immigrant Investor Program. See 8 CFR 204.6(m)(3)-(4). Once designated, regional centers must provide USCIS with updated information to demonstrate continued eligibility for the designation by submitting Form I-924A, Annual Certification of Regional Center on an annual basis or as otherwise requested. See 8 CFR 204.6(m)(6)(i)(B).

DHS is not changing the \$17,795 fee for entities seeking designation as a regional center under the Immigrant Investor Program, Form I-924. However, DHS is increasing the fee for the annual filings of Form I-924A from \$3,035 to \$4,465, an increase of \$1,430 per filing (47 percent).⁴⁵ The application process would require the same information from applicants that is currently required. During the 12-month period from October 1, 2016 to September 31, 2017, USCIS received a total of 280 Form I-924 applications and 847 Form I-924A applications.⁴⁶

Discussion of Impacts

DHS is not changing the fee for the Application for Regional Center Designation Under the Immigrant Investor Program, Form I-924. However, DHS is increasing the filing fee for Form I-924A from \$3,035 to \$4,465.

⁴² An immigrant investor, his or her spouse, and children (if any) will each use a separate visa number.

⁴³ Current law requires that DHS annually set aside 3,000 EB-5 immigrant visas for regional center investors. Section 116 of Public Law 105-119, 111 Stat. 2440 (Nov. 26, 1997). If this full annual allocation is not used, remaining visas may be allocated to foreign nationals who do not invest in regional centers.

⁴⁴ USCIS Immigrant Investor Regional Centers: <https://www.uscis.gov/working-united-states/permanent-workers/employment-based-immigration-fifth-preference-eb-5/immigrant-investor-regional-centers>.

⁴⁵ The Supplement to Form I-924A is used to certify a Regional Center’s continued eligibility for the Regional Center designation through an annual certification. Each designated Regional Center entity must file a Form I-924A for each fiscal year within 90 days after the end of the fiscal year of the calendar year in which the fiscal year ended. See <http://www.uscis.gov/i-924a>.

⁴⁶ Department of Homeland Security, U.S. Citizenship and Immigration Services, *Performance Reporting Tool*, March 2018.

Regional centers are difficult to assess because there is a lack of official data on employment, income, and industry classification for these entities. It is difficult to determine the small entity status of regional centers without such data. Such a determination is also difficult because regional centers can be structured in a variety of different ways, and can involve multiple business and financial activities, some of which may play a direct or indirect role in linking investor funds to new commercial enterprises (NCEs) and job-creating projects or entities. Regional centers also pose a challenge for analysis as the structure is often complex and can involve many related business and financial activities not directly involved with EB-5 activities. Regional centers can be made up of several layers of business and financial activities that focus on matching foreign investor funds to development projects to capture above market return differentials. In the past, DHS has attempted to treat the regional centers similar to the other entities in this analysis. DHS was not able to identify most of the entities in any of the public or private databases. Furthermore, while regional centers are an integral component of the EB-5 program, DHS does not collect data on the administrative fees the regional centers charge to the foreign investors who are investing in one of their projects. DHS did not focus on the bundled capital investment amounts (either \$900,000 for TEA projects or \$1.8 million for a non-TEA projects per investor)⁴⁷ that get invested into an NCE. Such investment amounts are not necessarily indicative of whether the regional center is appropriately characterized as a small entity for purposes of the RFA. Due to the lack of regional center revenue data, DHS assumes regional centers collect revenue primarily through the administrative fees charged to investors.

DHS did consider the information provided by regional center applicants as part of the Forms I-924 and I-924A, however, it does not include adequate data to allow DHS to reliably identify the small entity status of individual applicants. Although regional center applicants typically report the North American Industry Classification (NAICS) codes associated with the sectors they plan to direct investor funds toward, these codes do not necessarily apply to the regional centers themselves. In addition, information provided to DHS concerning regional centers generally does not include regional center revenues or employment.

DHS was able to obtain some information under some specific assumptions in an attempt to analyze the small entity status of regional centers. In the DHS final rule “EB-5 Immigrant Investor Program Modernization,” DHS analyzed estimated administrative fees and revenue amounts for regional centers.⁴⁸ DHS found both the mean and median for administrative fees to be \$50,000 and the median revenue amount to be \$1,250,000 over the period fiscal years 2014 to 2017. DHS does not know the extent to which these regional centers can pass along the fee increases to the individual investors. Passing along the costs from this rule can reduce or eliminate the economic impacts to the regional centers. While DHS cannot definitively claim there is no significant economic impact to these small entities based on existing information, DHS would assume existing regional centers with revenues equal to or less than \$446,500 per year (some of which DHS assumes would be derived from administrative fees charged to individual investors) could experience a significant economic impact if DHS assumes a fee

⁴⁷ U.S. Department of Homeland Security, USCIS – EB-5 Immigrant Investor Program Modernization, Final Rule. See 84 FR 35750. Dated July 24, 2019. Available at <https://www.govinfo.gov/content/pkg/FR-2019-07-24/pdf/2019-15000.pdf>. This amount by investor is determined between a designated Target Employment Area and non-Target Employment Area.

⁴⁸ Ibid.

increase that represents 1 percent of annual revenue is a “significant” economic burden under the RFA.⁴⁹

⁴⁹ Calculation: 1 percent of \$446,500 = \$4,465 (the new fee for Form I-924A).

Appendix A:
SBA NAICS Size Standards for I-129, I-140, I-910 and I-360 Petitions in Sample Dataset

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars (\$)	Size standards in number of employees
111150	Corn Farming	0.75	0
111199	All Other Grain Farming	0.75	0
111339	Other Noncitrus Fruit Farming	0.75	0
111421	Nursery and Tree Production	0.75	0
111910	Tobacco Farming	0.75	0
111930	Sugarcane Farming	0.75	0
111998	All Other Miscellaneous Crop Farming	0.75	0
112210	Hog and Pig Farming	0.75	0
112310	Chicken Egg Production	15	0
112910	Apiculture	0.75	0
115113	Crop Harvesting, Primarily by Machine	7.5	0
115116	Farm Management Services	7.5	0
115210	Support Activities for Animal Production	7.5	0
115310	Support Activities for Forestry	7.5	0
212230	Copper, Nickel, Lead, and Zinc Mining	0	750
212311	Dimension Stone Mining and Quarrying	0	500
213112	Support Activities for Oil and Gas Operations	38.5	0
221118	Other Electric Power Generation	0	250
221121	Electric Bulk Power Transmission and Control	0	500
221122	Electric Power Distribution	0	1000
236115	New Single-family Housing Construction (Except For-Sale Builders)	36.5	0
236118	Residential Remodelers	36.5	0
236210	Industrial Building Construction	36.5	0
236220	Commercial and Institutional Building Construction	36.5	0
237210	Land Subdivision	27.5	0
237310	Highway, Street, and Bridge Construction	36.5	0
238210	Electrical Contractors and Other Wiring Installation Contractors	15	0
238220	Plumbing, Heating, and Air-Conditioning Contractors	15	0
238290	Other Building Equipment Contractors	15	0
238310	Drywall and Insulation Contractors	15	0
238320	Painting and Wall Covering Contractors	15	0
238990	All Other Specialty Trade Contractors 13	15	0
311212	Rice Milling	0	500

311221	Wet Corn Milling	0	1250
311314	Cane Sugar Manufacturing	0	1000
311411	Frozen Fruit, Juice and Vegetable Manufacturing	0	1000
311520	Ice Cream and Frozen Dessert Manufacturing	0	1000
311710	Seafood Product Preparation and Packaging	0	750
311812	Commercial Bakeries	0	1000
311813	Frozen Cakes, Pies, and Other Pastries Manufacturing	0	750
311942	Spice and Extract Manufacturing	0	500
311999	All Other Miscellaneous Food Manufacturing	0	500
313210	Broadwoven Fabric Mills	0	1000
313230	Nonwoven Fabric Mills	0	750
313320	Fabric Coating Mills	0	1000
314110	Carpet and Rug Mills	0	1500
315190	Other Apparel Knitting Mills	0	750
315220	Men's and Boys' Cut and Sew Apparel Manufacturing	0	750
315240	Women's, Girls', and Infants' Cut and Sew Apparel Manufacturing	0	750
316210	Footwear Manufacturing	0	1000
322121	Paper (except Newsprint) Mills	0	1250
324110	Petroleum Refineries ⁴	0	1500
325180	Other Basic Inorganic Chemical Manufacturing	0	1000
325199	All Other Basic Organic Chemical Manufacturing	0	1250
325211	Plastics Material and Resin Manufacturing	0	1250
325411	Medicinal and Botanical Manufacturing	0	1000
325412	Pharmaceutical Preparation Manufacturing	0	1250
325414	Biological Product (except Diagnostic) Manufacturing	0	1250
325510	Paint and Coating Manufacturing	0	1000
325620	Toilet Preparation Manufacturing	0	1250
325910	Printing Ink Manufacturing	0	500
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing	0	500
326113	Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	0	750
326160	Plastics Bottle Manufacturing	0	1250
326199	All Other Plastics Product Manufacturing	0	750
327120	Clay Building Material and Refractories Manufacturing	0	750
327310	Cement Manufacturing	0	1000
327991	Cut Stone and Stone Product Manufacturing	0	500
331110	Iron and Steel Mills and Ferroalloy Manufacturing	0	1500
331221	Rolled Steel Shape Manufacturing	0	1000
332312	Fabricated Structural Metal Manufacturing	0	500

332999	All Other Miscellaneous Fabricated Metal Product Manufacturing	0	750
333241	Food Product Machinery Manufacturing	0	500
333242	Semiconductor Machinery Manufacturing	0	1500
333314	Optical Instrument and Lens Manufacturing	0	500
333514	Special Die and Tool, Die Set, Jig and Fixture Manufacturing	0	500
333515	Cutting Tool and Machine Tool Accessory Manufacturing	0	500
333914	Measuring, Dispensing, and Other Pumping Equipment Manufacturing	0	750
333992	Welding and Soldering Equipment Manufacturing	0	1250
333999	All Other Miscellaneous General Purpose Machinery Manufacturing	0	500
334112	Computer Storage Device Manufacturing	0	1250
334118	Computer Terminal and Other Computer Peripheral Equipment Manufacturing	0	1000
334210	Telephone Apparatus Manufacturing	0	1250
334220	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	0	1250
334290	Other Communications Equipment Manufacturing	0	750
334310	Audio and Video Equipment Manufacturing	0	750
334412	Bare Printed Circuit Board Manufacturing	0	750
334413	Semiconductor and Related Device Manufacturing	0	1250
334417	Electronic Connector Manufacturing	0	1000
334418	Printed Circuit Assembly (Electronic Assembly) Manufacturing	0	750
334419	Other Electronic Component Manufacturing	0	750
334510	Electromedical and Electrotherapeutic Apparatus Manufacturing	0	1250
334513	Instruments and Related Products Manufacturing for Measuring, Displaying, and Controlling Industrial Process Variables	0	750
334515	Instrument Manufacturing for Measuring and Testing Electricity and Electrical Signals	0	750
334516	Analytical Laboratory Instrument Manufacturing	0	1000
334519	Other Measuring and Controlling Device Manufacturing	0	500
334614	Software and Other Prerecorded Compact Disc, Tape, and Record Reproducing	0	1250
335110	Electric Lamp Bulb and Part Manufacturing	0	1250
335121	Residential Electric Lighting Fixture Manufacturing	0	750
335312	Motor and Generator Manufacturing	0	1250
335911	Storage Battery Manufacturing	0	1250
336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	0	1000

336330	Motor Vehicle Steering and Suspension Components (except Spring) Manufacturing	0	1000
336340	Motor Vehicle Brake System Manufacturing	0	1250
336370	Motor Vehicle Metal Stamping	0	1000
336390	Other Motor Vehicle Parts Manufacturing	0	1000
336411	Aircraft Manufacturing	0	1500
337110	Wood Kitchen Cabinet and Counter Top Manufacturing	0	750
337212	Custom Architectural Woodwork and Millwork Manufacturing	0	500
337214	Office Furniture (Except Wood) Manufacturing	0	1000
337215	Showcase, Partition, Shelving, and Locker Manufacturing	0	500
337910	Mattress Manufacturing	0	1000
339112	Surgical and Medical Instrument Manufacturing	0	1000
339113	Surgical Appliance and Supplies Manufacturing	0	750
339114	Dental Equipment and Supplies Manufacturing	0	750
339115	Ophthalmic Goods Manufacturing	0	1000
339116	Dental Laboratories	0	500
339920	Sporting and Athletic Goods Manufacturing	0	750
339930	Doll, Toy, and Game Manufacturing	0	500
339999	All Other Miscellaneous Manufacturing	0	500
423110	Automobile and Other Motor Vehicle Merchant Wholesalers	0	250
423120	Motor Vehicle Supplies and New Parts Merchant Wholesalers	0	200
423130	Tire and Tube Merchant Wholesalers	0	200
423210	Furniture Merchant Wholesalers	0	100
423220	Home Furnishing Merchant Wholesalers	0	100
423320	Brick, Stone, and Related Construction Material Merchant Wholesalers	0	150
423330	Roofing, Siding, and Insulation Material Merchant Wholesalers	0	200
423420	Office Equipment Merchant Wholesalers	0	200
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	0	250
423450	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers	0	200
423460	Ophthalmic Goods Merchant Wholesalers	0	150
423510	Metal Service Centers and Other Metal Merchant Wholesalers	0	200
423520	Coal and Other Mineral and Ore Merchant Wholesalers	0	100
423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	0	200

423690	Other Electronic Parts and Equipment Merchant Wholesalers	0	250
423710	Hardware Merchant Wholesalers	0	150
423730	Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers	0	150
423810	Construction and Mining (except Oil Well) Machinery and Equipment Merchant Wholesalers	0	250
423830	Industrial Machinery and Equipment Merchant Wholesalers	0	100
423850	Service Establishment Equipment and Supplies Merchant Wholesalers	0	100
423910	Sporting and Recreational Goods and Supplies Merchant Wholesalers	0	100
423920	Toy and Hobby Goods and Supplies Merchant Wholesalers	0	150
423930	Recyclable Material Merchant Wholesalers	0	100
423940	Jewelry, Watch, Precious Stone, and Precious Metal Merchant Wholesalers	0	100
423990	Other Miscellaneous Durable Goods Merchant Wholesalers	0	100
424210	Drugs and Druggists' Sundries Merchant Wholesalers	0	250
424320	Men's and Boys' Clothing and Furnishings Merchant Wholesalers	0	150
424330	Women's, Children's, and Infants' Clothing and Accessories Merchant Wholesalers	0	100
424340	Footwear Merchant Wholesalers	0	200
424410	General Line Grocery Merchant Wholesalers	0	250
424440	Poultry and Poultry Product Merchant Wholesalers	0	150
424470	Meat and Meat Product Merchant Wholesalers	0	150
424480	Fresh Fruit and Vegetable Merchant Wholesalers	0	100
424490	Other Grocery and Related Products Merchant Wholesalers	0	250
424610	Plastics Materials and Basic Forms and Shapes Merchant Wholesalers	0	150
424690	Other Chemical and Allied Products Merchant Wholesalers	0	150
424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)	0	200
424810	Beer and Ale Merchant Wholesalers	0	200
424820	Wine and Distilled Alcoholic Beverage Merchant Wholesalers	0	250
424910	Farm Supplies Merchant Wholesalers	0	200
424920	Book, Periodical, and Newspaper Merchant Wholesalers	0	200
424930	Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers	0	100
424940	Tobacco and Tobacco Product Merchant Wholesalers	0	250

424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers	0	100
441110	New Car Dealers	0	200
441222	Boat Dealers	32.5	0
441228	Motorcycle, ATV, and All Other Motor Vehicle Dealers	32.5	0
442110	Furniture Stores	20.5	0
442210	Floor Covering Stores	7.5	0
442299	All Other Home Furnishings Stores	20.5	0
443142	Electronics Stores	32.5	0
444220	Nursery and Garden Centers	11	0
445110	Supermarkets and Other Grocery (except Convenience) Stores	32.5	0
445230	Fruit and Vegetable Markets	7.5	0
445299	All Other Specialty Food Stores	7.5	0
446110	Pharmacies and Drug Stores	27.5	0
446191	Food (Health) Supplement Stores	15	0
446199	All Other Health and Personal Care Stores	7.5	0
447190	Other Gasoline Stations	15	0
448120	Women's Clothing Stores	27.5	0
448140	Family Clothing Stores	38.5	0
448310	Jewelry Stores	15	0
451110	Sporting Goods Stores	15	0
451120	Hobby, Toy and Game Stores	27.5	0
452319	All Other General Merchandise Stores	32.5	0
453991	Tobacco Stores	7.5	0
453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)	7.5	0
454110	Electronic Shopping and Mail-Order Houses	38.5	0
481111	Scheduled Passenger Air Transportation	0	1500
484110	General Freight Trucking, Local	27.5	0
484121	General Freight Trucking, Long-Distance, Truckload	27.5	0
485410	School and Employee Bus Transportation	15	0
487210	Scenic and Sightseeing Transportation, Water	7.5	0
488210	Support Activities for Rail Transportation	15	0
488510	Freight Transportation Arrangement ¹⁰	15	0
488999	All Other Support Activities for Transportation	7.5	0
511110	Newspaper Publishers	0	1000
511120	Periodical Publishers	0	1000
511130	Book Publishers	0	1000
511199	All Other Publishers	0	500
511210	Software Publishers	38.5	0
512110	Motion Picture and Video Production	32.5	0

512131	Motion Picture Theaters (except Drive-Ins)	38.5	0
512191	Teleproduction and Other Postproduction Services	32	0
512230	Music Publishers	0	750
512240	Sound Recording Studios	7.5	0
515111	Radio Networks	32.5	0
515120	Television Broadcasting	38.5	0
515210	Cable and Other Subscription Programming	38.5	0
517311	Wired Telecommunications Carriers	0	1500
517312	Wireless Telecommunications Carriers (except Satellite)	0	1500
517911	Telecommunications Resellers	0	1500
517919	All Other Telecommunications	32.5	0
518210	Data Processing, Hosting, and Related Services	32.5	0
519190	All Other Information Services	27.5	0
522110	Commercial Banking	550 million in assets	0
522220	Sales Financing	38.5	0
522292	Real Estate Credit	38.5	0
522293	International Trade Financing	38.5	0
522298	All Other Nondepository Credit Intermediation	38.5	0
523110	Investment Banking and Securities Dealing	38.5	0
523120	Securities Brokerage	38.5	0
523210	Securities and Commodity Exchanges	38.5	0
523910	Miscellaneous Intermediation	38.5	0
523930	Investment Advice	38.5	0
523991	Trust, Fiduciary and Custody Activities	38.5	0
523999	Miscellaneous Financial Investment Activities	38.5	0
524114	Direct Health and Medical Insurance Carriers	38.5	0
524126	Direct Property and Casualty Insurance Carriers	0	1500
524130	Reinsurance Carriers	38.5	0
524210	Insurance Agencies and Brokerages	7.5	0
524298	All Other Insurance Related Activities	15	0
525910	Open-End Investment Funds	32.5	0
525990	Other Financial Vehicles	32.5	0
531110	Lessors of Residential Buildings and Dwellings ⁹	27.5	0
531120	Lessors of Nonresidential Buildings (except Miniwarehouses) ⁹	27.5	0
531210	Offices of Real Estate Agents and Brokers ¹⁰	7.5	0
531312	Nonresidential Property Managers	7.5	0
532289	All Other Consumer Goods Rental	7.5	0
532412	Construction, Mining and Forestry Machinery and Equipment Rental and Leasing	32.5	0

533110	Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)	38.5	0
541110	Offices of Lawyers	11	0
541211	Offices of Certified Public Accountants	20.5	0
541213	Tax Preparation Services	20.5	0
541219	Other Accounting Services	20.5	0
541310	Architectural Services	7.5	0
541320	Landscape Architectural Services	7.5	0
541330	Engineering Services	15	0
541370	Surveying and Mapping (except Geophysical) Services	15	0
541380	Testing Laboratories	15	0
541410	Interior Design Services	7.5	0
541430	Graphic Design Services	7.5	0
541511	Custom Computer Programming Services	27.5	0
541512	Computer Systems Design Services	27.5	0
541519	Other Computer Related Services	27.5	0
541611	Administrative Management and General Management Consulting Services	15	0
541612	Human Resources Consulting Services	15	0
541613	Marketing Consulting Services	15	0
541618	Other Management Consulting Services	15	0
541620	Environmental Consulting Services	15	0
541690	Other Scientific and Technical Consulting Services	15	0
541714	Research and Technology in Biotechnology (except Nanobiotechnology) ¹¹	0	1000
541715	Research and Development in the Physical, Engineering, and Life Sciences (except Nanotechnology and Biotechnology) ¹¹	0	1000
541810	Advertising Agencies ¹⁰	15	0
541850	Outdoor Advertising	15	0
541860	Direct Mail Advertising	15	0
541890	Other Services Related to Advertising	15	0
541910	Marketing Research and Public Opinion Polling	15	0
541921	Photography Studios, Portrait	7.5	0
541922	Commercial Photography	7.5	0
541940	Veterinary Services	7.5	0
541990	All Other Professional, Scientific and Technical Services	15	0
551112	Offices of Other Holding Companies	20.5	0
561110	Office Administrative Services	7.5	0
561311	Employment Placement Agencies	27.5	0
561312	Executive Search Services	27.5	0
561320	Temporary Help Services	27.5	0

561491	Repossession Services	15	0
561499	All Other Business Support Services	15	0
561510	Travel Agencies ¹⁰	20.5	0
561520	Tour Operators ¹⁰	20.5	0
561720	Janitorial Services	18	0
561730	Landscaping Services	7.5	0
561790	Other Services to Buildings and Dwellings	7.5	0
561990	All Other Support Services	11	0
562920	Materials Recovery Facilities	20.5	0
611110	Elementary and Secondary Schools	11	0
611310	Colleges, Universities and Professional Schools	27.5	0
611420	Computer Training	11	0
611519	Other Technical and Trade Schools	15	0
611610	Fine Arts Schools	7.5	0
611630	Language Schools	11	0
611699	All Other Miscellaneous Schools and Instruction	11	0
611710	Educational Support Services	15	0
621111	Offices of Physicians (except Mental Health Specialists)	11	0
621112	Offices of Physicians, Mental Health Specialists	11	0
621210	Offices of Dentists	7.5	0
621330	Offices of Mental Health Practitioners (except Physicians)	7.5	0
621340	Offices of Physical, Occupational and Speech Therapists and Audiologists	7.5	0
621399	Offices of All Other Miscellaneous Health Practitioners	7.5	0
621491	HMO Medical Centers	32.5	0
621498	All Other Outpatient Care Centers	20.5	0
621511	Medical Laboratories	32.5	0
621512	Diagnostic Imaging Centers	15	0
621610	Home Health Care Services	15	0
621999	All Other Miscellaneous Ambulatory Health Care Services	15	0
622110	General Medical and Surgical Hospitals	38.5	0
623110	Nursing Care Facilities (Skilled Nursing Facilities)	27.5	0
623210	Residential Intellectual and Developmental Disability Facilities	15	0
623990	Other Residential Care Facilities	11	0
624120	Services for the Elderly and Persons with Disabilities	11	0
624190	Other Individual and Family Services	11	0
711190	Other Performing Arts Companies	27.5	0
711211	Sports Teams and Clubs	38.5	0

711310	Promoters of Performing Arts, Sports and Similar Events with Facilities	32.5	0
711410	Agents and Managers for Artists, Athletes, Entertainers and Other Public Figures	11	0
711510	Independent Artists, Writers, and Performers	7.5	0
712110	Museums	27.5	0
713910	Golf Courses and Country Clubs	15	0
713940	Fitness and Recreational Sports Centers	7.5	0
721110	Hotels (except Casino Hotels) and Motels	32.5	0
721214	Recreational and Vacation Camps (except Campgrounds)	7.5	0
722511	Full-Service Restaurants	7.5	0
722513	Limited-Service Restaurants	11	0
811198	All Other Automotive Repair and Maintenance	7.5	0
811212	Computer and Office Machine Repair and Maintenance	27.5	0
811310	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	7.5	0
812112	Beauty Salons	7.5	0
812220	Cemeteries and Crematories	20.5	0
812921	Photofinishing Laboratories (except One-Hour)	20.5	0
812990	All Other Personal Services	7.5	0
813110	Religious Organizations	7.5	0
813211	Grantmaking Foundations	32.5	0
813312	Environment, Conservation and Wildlife Organizations	15	0
813319	Other Social Advocacy Organizations	7.5	0
813410	Civic and Social Organizations	7.5	0
813910	Business Associations	7.5	0
813920	Professional Organizations	15	0
813990	Other Similar Organizations (except Business, Professional, Labor, and Political Organizations)	7.5	0

Appendix B: Form I-129 Sample with Petition Totals

Sample ID	Petitions
1	1
2	2
3	2
4	1
5	1
6	1
7	1
8	1
9	3
10	1
11	3
12	1
13	4
14	2
15	1
16	2
17	2
18	1
19	3
20	37
21	1
22	8
23	1
24	1
25	1
26	1
27	1
28	2
29	1
30	1
31	2
32	3
33	1
34	1
35	1
36	2
37	1
38	1
39	2

40	1
41	1
42	1
43	2
44	2
45	2
46	2
47	1
48	1
49	1
50	4
51	1
52	11
53	2
54	1
55	10
56	2
57	2
58	1
59	1
60	3
61	1
62	1
63	4
64	1
65	1
66	1
67	4
68	1
69	1
70	1
71	1
72	1
73	3
74	1
75	17
76	1
77	4
78	1
79	1

80	1
81	2
82	1
83	5
84	1
85	1
86	2
87	19
88	12
89	1
90	1
91	2
92	1
93	1
94	2
95	2
96	1
97	1
98	1
99	1
100	1
101	1
102	2
103	18
104	1
105	1
106	12
107	2
108	2
109	2
110	1
111	1
112	1
113	1
114	1
115	1
116	1
117	5
118	2
119	158

120	1
121	6
122	3
123	1
124	4
125	1
126	1
127	28
128	1
129	1
130	1
131	1
132	1
133	1
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146	1
147	2
148	2
149	1
150	1
151	1
152	1
153	1
154	1
155	2
156	1
157	1
158	1
159	2
160	1

161	63
162	1
163	1
164	2
165	2
166	39
167	2
168	2
169	2
170	2
171	15
172	1
173	3
174	2
175	2
176	2
177	7
178	1
179	13
180	10
181	3
182	1
183	1
184	2
185	1
186	1
187	4
188	3
189	1
190	1
191	1
192	1
193	1
194	1
195	1
196	3
197	1
198	2
199	1
200	1
201	33

202	23
203	4
204	1
205	1
206	42
207	1
208	1
209	5
210	7
211	1
212	1
213	2
214	1
215	33
216	1
217	5
218	3
219	5
220	1
221	1
222	6
223	2
224	3
225	3
226	2
227	2
228	1
229	2
230	2
231	1
232	1
233	2
234	9
235	1
236	2
237	2
238	2
239	1
240	5
241	1
242	8

243	1
244	3
245	1
246	1
247	1
248	1
249	1
250	2
251	1
252	1
253	1
254	1
255	2
256	1
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269	1
270	1
271	1
272	1
273	1
274	1
275	1
276	1
277	1
278	3
279	1
280	2
281	1
282	1
283	1

284	1
285	37
286	1
287	1
288	1
289	1
290	1
291	1
292	16
293	1
294	1
295	1
296	1
297	3
298	1
299	1
300	2
301	1
302	2
303	3
304	1
305	1
306	1
307	1
308	1
309	1
310	4
311	1
312	1
313	2
314	1
315	1
316	2
317	1
318	1
319	1
320	1
321	2
322	3
323	1
324	2

325	39
326	3
327	2
328	14
329	1
330	12
331	2
332	1
333	1
334	14
335	38
336	1
337	1
338	1
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351	1
352	1
353	1
354	1
355	12
356	1
357	2
358	1
359	2
360	1
361	3
362	2
363	1
364	6
365	1

366	1
367	2
368	1
369	3
370	2
371	1
372	6
373	10
374	13
375	1
376	1
377	317
378	2
379	1
380	1
381	1
382	1
383	2
384	1
385	1
386	8
387	3
388	1
389	5
390	15
391	1
392	2
393	1
394	1
395	1
396	1
397	2
398	1
399	1
400	1
401	6
402	2
403	1
404	5
405	1
406	2

407	25
408	1
409	1
410	8
411	1
412	1
413	1
414	1
415	20
416	1
417	1
418	1
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422	1
423	1
424	1
425	63
426	1
427	2
428	1
429	2
430	1
431	1
432	1
433	1
434	1
435	2
436	2
437	1
438	1
439	1
440	1
441	2
442	1
443	1
444	1
445	2
446	2
447	5

448	6
449	2
450	1
451	1
452	1
453	1
454	1
455	2
456	3
457	1
458	1
459	1
460	1
461	1
462	1
463	1
464	1
465	2
466	1
467	1
468	6
469	1
470	1
471	1
472	1
473	1
474	2
475	2
476	17
477	1
478	1
479	1
480	1
481	23
482	1
483	3
484	2
485	1
486	109
487	1
488	7

489	1
490	1
491	1
492	1
493	1
494	15
495	1
496	3
497	1
498	6
499	1
500	1
501	2
502	1
503	1
504	1
505	1
506	1
507	1
508	1
509	178
510	35
511	1
512	2
513	1
514	1
515	3
516	2
517	1
518	1
519	1
520	1
521	1
522	7
523	1
524	1
525	1
526	1
527	1
528	1
529	6

530	1
531	1
532	2
533	1
534	3
535	8
536	1
537	3
538	1
539	1
540	1
541	2
542	3
543	1
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553	1
554	1
555	24
556	2
557	1
558	2
559	10
560	40
561	1
562	2
563	3
564	1
565	1
566	1
567	1
568	1
569	6
570	3

571	1
572	2
573	1
574	1
575	2
576	28
577	2
578	1
579	1
580	1
581	2
582	1
583	5
584	1
585	3
586	2
587	1
588	4
589	1
590	1
591	4
592	1
593	1
594	2
595	1
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598	5
599	1
600	1
601	1
602	1
603	5
604	2
605	1
606	2
607	1
608	1
609	2
610	1
611	1

612	1
613	1
614	1
615	1
616	5
617	1
618	1
619	1
620	1
621	2
622	1
623	2
624	2

625	2
626	1
627	12
628	3
629	1
630	3
631	1
632	1
633	1
634	6
635	3
636	2
637	4

638	1
639	1
640	3
641	2
642	6
643	3
644	3
645	2
646	1
647	1
648	1
649	1
650	2

Appendix C: Form I-140 Sample with Petition Totals

Sample ID	Petitions
1	1
2	5
3	1
4	5
5	1
6	1
7	1
8	9
9	1
10	1
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13	1
14	1
15	1
16	1
17	1
18	1
19	1
20	1
21	1
22	1
23	5
24	4
25	2
26	1
27	1
28	7
29	1
30	1
31	1
32	1
33	1
34	1
35	2
36	1
37	1
38	2

39	1
40	1
41	1
42	3
43	1
44	1
45	1
46	17
47	1
48	1
49	1
50	2
51	3
52	20
53	1
54	1
55	1
56	25
57	7
58	1
59	1
60	4
61	3
62	1
63	2
64	1
65	1
66	7
67	1
68	4
69	1
70	2
71	3
72	1
73	11
74	1
75	1
76	1
77	1

78	1
79	2
80	2
81	1
82	1
83	3
84	1
85	1
86	3
87	1
88	4
89	2
90	3
91	1
92	1
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94	1
95	1
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102	3
103	6
104	1
105	1
106	2
107	1
108	5
109	2
110	8
111	2
112	1
113	1
114	1
115	1
116	6

117	7
118	2
119	3
120	4
121	1
122	9
123	2
124	1
125	2
126	1
127	1
128	1
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144	1
145	1
146	1
147	1
148	1
149	1
150	4
151	1
152	1
153	1
154	1
155	1
156	1
157	1

158	2
159	1
160	1
161	8
162	1
163	1
164	7
165	1
166	1
167	2
168	1
169	1
170	1
171	1
172	3
173	5
174	3
175	1
176	1
177	1
178	1
179	2
180	1
181	4
182	1
183	1
184	2
185	4
186	1
187	1
188	13
189	1
190	1
191	5
192	1
193	1
194	5
195	3
196	1
197	1
198	1

199	1
200	3
201	1
202	1
203	1
204	1
205	4
206	2
207	1
208	1
209	5
210	2
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225	1
226	1
227	1
228	14
229	4
230	1
231	1
232	6
233	1
234	1
235	1
236	1
237	1
238	1
239	1

240	1
241	1
242	4
243	2
244	1
245	1
246	1
247	1
248	1
249	5
250	1
251	1
252	9
253	3
254	1
255	1
256	7
257	1
258	5
259	1
260	1
261	1
262	1
263	1
264	49
265	1
266	1
267	56
268	2
269	2
270	1
271	1
272	2
273	5
274	1
275	2
276	1
277	1
278	69
279	3
280	16

281	2
282	1
283	1
284	1
285	1
286	1
287	2
288	12
289	1
290	3
291	10
292	1
293	2
294	3
295	1
296	1
297	1
298	1
299	1
300	1
301	1
302	1
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307	1
308	1
309	2
310	6
311	6
312	1
313	1
314	7
315	1
316	1
317	1
318	1
319	1
320	1
321	3

322	1
323	1
324	53
325	43
326	1
327	1
328	1
329	1
330	2
331	1
332	1
333	1
334	1
335	4
336	1
337	2
338	1
339	2
340	1
341	1
342	1
343	3
344	2
345	1
346	1
347	2
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349	1
350	1
351	2
352	4
353	1
354	1
355	1
356	1
357	1
358	2
359	2
360	1
361	1
362	2

363	1
364	1
365	7
366	1
367	1
368	3
369	1
370	1
371	3
372	3
373	1
374	1
375	1
376	4
377	8
378	1
379	7
380	1
381	4
382	15
383	1
384	1
385	19
386	1
387	4
388	1
389	1
390	1
391	6
392	1
393	1
394	1
395	1
396	1
397	1
398	3
399	2
400	1
401	1
402	6
403	1

404	13
405	1
406	1
407	1
408	1
409	1
410	3
411	1
412	1
413	2
414	1
415	6
416	1
417	1
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422	14
423	2
424	1
425	2
426	3
427	1
428	1
429	1
430	2
431	1
432	1
433	1
434	1
435	2
436	6
437	32
438	3
439	1
440	1
441	2
442	1
443	1
444	1

445	2
446	2
447	1
448	3
449	3
450	1
451	1
452	2
453	1
454	2
455	1
456	1
457	3
458	1
459	1
460	1
461	2
462	2
463	1
464	1
465	4
466	2
467	3
468	1
469	1
470	1
471	1
472	3
473	1
474	11
475	2
476	1
477	3
478	3
479	2
480	2
481	1
482	1
483	1
484	1
485	5

486	1
487	2
488	1
489	1
490	1
491	5
492	1
493	1
494	1
495	2
496	1
497	6
498	4
499	2
500	1
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503	1
504	2
505	3
506	1
507	80

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511	1
512	1
513	1
514	1
515	3
516	1
517	1
518	1
519	1
520	1
521	2
522	5
523	1
524	7
525	10
526	1
527	1
528	5
529	1

530	1
531	1
532	1
533	27
534	1
535	3
536	3
537	7
538	1
539	1
540	1
541	1
542	1
543	1
544	1
545	1
546	1
547	1
548	1
549	1
550	3

Appendix D: Form I-910 Sample with Petition Totals

Sample ID	Petitions
1	1
2	1
3	1
4	2
5	1
6	1
7	1
8	2
9	1
10	1
11	1
12	1
13	1
14	1
15	1
16	4
17	2
18	1
19	1
20	1
21	1
22	1
23	1
24	1
25	1
26	2
27	1
28	3
29	1
30	1
31	1
32	2
33	1
34	1
35	1
36	1
37	1
38	2

39	1
40	1
41	1
42	2
43	1
44	1
45	1
46	3
47	1
48	1
49	3
50	1
51	1
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54	1
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58	3
59	4
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62	2
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65	1
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68	2
69	1
70	1
71	2
72	1
73	1
74	2
75	2
76	2
77	1

78	2
79	1
80	0
81	1
82	2
83	1
84	1
85	1
86	1
87	1
88	2
89	2
90	1
91	1
92	2
93	1
94	1
95	1
96	1
97	1
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102	1
103	1
104	1
105	2
106	2
107	1
108	1
109	1
110	3
111	1
112	1
113	2
114	1
115	2
116	5
117	2

118	1
119	2
120	8
121	2
122	7
123	2
124	1
125	2
126	1
127	4
128	1
129	1
130	1
131	1
132	1
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144	1
145	1
146	1
147	1
148	5
149	1
150	1
151	1
152	1
153	1
154	1
155	1
156	1
157	1
158	1

159	1
160	1
161	6
162	2
163	1
164	1
165	2
166	1
167	1
168	1
169	1
170	1
171	0
172	1
173	1
174	1
175	4
176	1
177	1
178	1
179	5
180	1
181	1
182	1
183	2
184	1
185	0
186	1
187	1
188	4
189	1
190	3
191	1
192	1
193	3
194	1
195	2
196	1
197	1
198	1
199	1

200	1
201	1
202	4
203	1
204	1
205	2
206	1
207	1
208	1
209	1
210	1
211	1
212	1
213	1
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226	2
227	1
228	2
229	2
230	1
231	1
232	4
233	1
234	1
235	1
236	2
237	1
238	1
239	3
240	1

241	1
242	1
243	1
244	3
245	1
246	2
247	1
248	1
249	2
250	1
251	1
252	1
253	1
254	1
255	1
256	1
257	2
258	1
259	1
260	2
261	1
262	1
263	1
264	1
265	1
266	1
267	1
268	1
269	4

270	2
271	3
272	2
273	1
274	3
275	1
276	1
277	1
278	1
279	1
280	2
281	3
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286	1
287	3
288	1
289	1
290	4
291	5
292	1
293	2
294	1
295	1
296	1
297	1
298	1
299	1

300	1
301	2
302	3
303	1
304	1
305	1
306	1
307	1
308	1
309	1
310	5
311	4
312	1
313	3
314	1
315	1
316	2
317	2
318	2
319	1
320	1
321	1
322	1
323	1
324	1
325	2
326	1
327	1
328	1
329	1

Appendix E: Form I-360 Sample with Petition Totals

Sample ID	Petitions
1	1
2	1
3	1
4	1
5	1
6	1
7	1
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9	1
10	1
11	3
12	1
13	1
14	1
15	1
16	1
17	2
18	1
19	1
20	1
21	1
22	1
23	1
24	1
25	1
26	1
27	3
28	1
29	1
30	1
31	1
32	1
33	1
34	1
35	1
36	1
37	3
38	1

39	1
40	8
41	1
42	2
43	1
44	1
45	1
46	2
47	1
48	2
49	2
50	1
51	5
52	1
53	1
54	2
55	3
56	1
57	4
58	1
59	1
60	4
61	1
62	3
63	1
64	1
65	2
66	1
67	1
68	1
69	2
70	1
71	2
72	1
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