

## **SUPPORTING STATEMENT**

### **Application to Replace Permanent Resident Card**

*Form I-90*

**(OMB No. 1615-0082)**

#### **A. JUSTIFICATION.**

1. According to 8 CFR 264.5, a permanent resident is required to replace a permanent resident card using Form I-90 when:
  - (1) The previous card has been lost, stolen, or destroyed;
  - (2) The existing card will be expiring within six months;
  - (3) The existing card has been mutilated;
  - (4) The bearer's name or other biographic information has been legally changed since issuance of the existing card;
  - (5) The applicant is taking up actual residence in the United States after having been a commuter, or is a permanent resident taking up commuter status;
  - (6) The applicant has been automatically converted to permanent resident status;
  - (7) The previous card was issued but never received;
  - (8) The bearer of the card reaches the age of 14 years, unless the existing card will expire prior to the bearer's 16th birthday; or when
  - (9) The existing card bears incorrect data on account of U.S. Citizenship and Immigration Services (USCIS) error.

2. The information collected will be used by USCIS to determine eligibility for a Permanent Resident Card. The form serves the purpose of standardizing requests for the benefit, and ensuring that basic information required to assess eligibility is provided by the applicants. This form has been revised (see table of changes).
3. The form I-90 is available electronically at <http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnextoid=b3f7ab0a43b5d010VgnVCM10000048f3d6a1RCRD&vgnnextchannel=db029c7755cb9010VgnVCM10000045f3d6a1RCRD> . This form can be electronically filed at url: <http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnextoid=f3fe194d3e88d010VgnVCM10000048f3d6a1RCRD&vgnnextchannel=9059d9808bcbd010VgnVCM100000d1f1d6a1RCRD>
4. A review of the USCIS forms inventory report revealed no duplication of effort, and there is no other similar information currently available that can be used for this purpose.
5. This collection of information does not have an impact on small businesses or other small entities.
6. If we do not collect this information, a lawful permanent resident will not be able to replace his or her Permanent Resident Card.
7. There are no special circumstances applicable to this information collection.

8. On November 15, 2011, USCIS published a 60-day notice in the Federal Register at 76 FR 70747. USCIS received one comment on the 60-day notice. The following is a summary of the comments and USCIS response.

USCIS thanks the commenter for sharing experiences with our e-Filing system, forms and filing instructions. Specifically, filed a Form I-90, Application to Replace Permanent Resident Card, and a Form I-912, Request for Fee Waiver. U.S. Citizenship and Immigration Services (USCIS) welcomes the points the commenter raised and will consider them as USCIS improves our web content, forms and filing instructions.

#### **USCIS Online Services**

USCIS regrets the commenter had difficulty finding our online services. Our website, [www.uscis.gov](http://www.uscis.gov), is one of the most highly used government sites, and we strive toward a prominent Internet presence. Some companies design their websites to look like official government sites. These may be legitimate companies; however, they may charge fees for forms and services that USCIS provides for free. Others illegitimate sites perpetuate scams that harm individuals seeking immigration benefits. The commenter may be interested in our new initiative to help our customers avoid scams; information is available at this link <http://www.uscis.gov/avoidscams>.

#### **USCIS Intake: E-Filing and Lockbox Facilities**

Our current e-Filing system provides electronic intake for some forms; however, fee waiver requests cannot be processed through e-Filing. USCIS employees review and approve or deny fee waiver requests before an application is accepted

and sent to a USCIS office for adjudication. Fee waiver requests are handled through USCIS's Lockbox facilities; which are staffed with employees who are trained to review fee waiver requests.

### **USCIS Forms and Filing Instructions**

USCIS is releasing many of its forms in an Adobe fillable format. When downloaded from our website and completed electronically, the forms contain features that will help customers complete them correctly. We recently posted a new Form I-90 to [www.uscis.gov](http://www.uscis.gov), which we anticipate will reduce customer filing errors and questions.

### **USCIS ELIS**

USCIS is undertaking an agency-wide effort to move immigration services from a paper-based model to a secure electronic environment. USCIS has created a Web-based system for immigration benefit seekers and their legal representatives to submit and track applications. This new system, called USCIS Electronic Immigration System (USCIS ELIS), will operate similarly to popular commercial sites and include many of the improvements the commenter is recommending. Please check our website for updates on this exciting new filing system at this link: <http://www.uscis.gov/transformation>.

On January 18, 2012, USCIS published a 30-day notice in the Federal Register at 77 FR 2560. No comments were received.

9. The USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.

10. There is no assurance of confidentiality. The System of Records Notice associated with this information collection is USCIS Benefits Information System published on September 29, 2008 at 72 FR 56596. The associated Privacy Impact Assessment is USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum; dated September 5, 2008.

11. There are no questions of a sensitive nature. The system of records notice...

12. Annual Reporting Burden:

a.	Number of Respondents	540,000
b.	Number of Responses per each Respondent	1
c.	Total Annual Responses	540,000
d.	Hours per Response	.916
e.	Total Annual Reporting Burden	494,640

**Annual Burden Hours**

**Total annual reporting burden hours is 494,640.** This figure was derived by multiplying the number of respondents (540,000) x frequency of response (1) x hours per response (55) minutes (.916).

**The estimated annual public burden hour cost is \$15,205,233.** This is based on the number of respondents 540,000 x 55 minutes (.916) per response x \$30.74 (average hourly rate).

13. There is no capital, start-up, maintenance or operational costs associated with this information collection.

*For informational purposes, USCIS offers that there is an estimated annual fee of \$365 per respondent for a total of \$197,100,000 and a Biometric fee of \$85 per respondent for a total of \$46,495,000.*

**14. Annualized Cost Analysis:**

<b>a.</b>	Printing Cost	\$	184,859
<b>b.</b>	Collection and Processing Cost	\$	243,595,000
<b>c.</b>	<b>Total Cost to Government</b>	<b>\$</b>	<b>243,779,859</b>

15. There has been no increase or decrease in the estimated number of burden hours previously reported for this collection. The form has been updated to allow respondents to better enter the information that has been required (addition of Postal Code, Province, and Country fields in Parts 1 and 6; addition of preparer's e-mail address in Part 6) which was provided but not in the correct way – there is no change to burden because this was previously included in the burden calculation. The instructions have been updated to better explain the process to the respondents and the previously calculated burden for this part of the total hour burden per response has not changed. The cost to the respondent previously reported in ROCIS has been removed as this was incorrectly listed in the previous submission.

16. USCIS does not intend to employ the use of statistic or the publication thereof for this collection of information.

17. The USCIS will display the expiration date for OMB approval of this information collection.

18. The USCIS does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods.**

Not applicable.