**Supporting Detail in Support of Non-material or Non-Substantive Change to a Currently Approved Collection – OMB Control Number 1615-0082 Form I-90**

**History:**

On October 21st, 2014, USCIS received approval for a revision of the paper and electronic versions of the USCIS Form I-90, Application to Replace Permanent Resident Card, OMB Control Number 1615-0082. USCIS was not able to implement the approved revised paper or electronic versions due to interoperability issues with the USCIS Form G-28, Notice of Entry of Appearance as an Attorney or Accredited Representative (OMB Control Number 1615-0105) that had a revision being processed separately. This delayed the agency’s ability to finalize, test and release the I-90 and the anticipated date USCIS expects to make this new version available is April 18th, 2015.

**Action Requested:**

USCIS respectfully requests that OMB consider the action requested via the OMB Form 83C (“Change Request”), with additional explanation following:

1. Approve for immediate use the paper version of the I-90 that received OMB clearance on March 11, 2013 and which is dated January 18, 2013. **Term of Clearance:** Approve use to and including April 17th, 2015.
2. Provide pre-implementation approval for the new paper version of the I-90 that received OMB clearance on December 29, 2014 for use beginning April 18th, 2015. **Term of Clearance:** Begin use on April 18th, 2015.
3. Approve an updated process for collecting signatures of preparers and translators for persons not represented by an attorney or accredited representative within the USCIS ELIS data collection process. **Term of Clearance:** Approve modified collection of signatures of translators and/ or preparers of the form I-90 for respondents not represented by an attorney or accredited representative effective March 30, 2015.

**Supporting Documents:**

1. Draft letter to American Immigration Lawyers Association.
2. Table of changes for Form I-90 to add “petition, or request” to the section titled Acknowledgement of Appointment at a USCIS Application Support Center.
3. Form I-90 and instructions approved for use via 3/11/2013 Notice of Action
4. Updated screenshots of the proposed USCIS ELIS collection of signatures