

**SUPPORTING STATEMENT FOR  
Application to Replace Permanent Resident Card  
OMB Control No.: 1615-0082  
COLLECTION INSTRUMENT(S): I-90**

**A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Authorizing statute: 8 USC 1304.

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. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collected will be used by USCIS to determine eligibility for a Permanent Resident Card and collect biometric information. The form serves the purpose of standardizing requests for the benefit and ensuring that basic information required to assess eligibility and the biometrics information required for card production are provided by the applicants. This form has been revised (see table of changes).

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The paper version of the form I-90 is available electronically at:  
<https://www.uscis.gov/i-90>

This form can be electronically filed at url:  
<https://myaccount.uscis.gov>

Currently, the I-90 is also available to respondents via the USCIS e-file webpage accessed through the USCIS Forms homepage. This method of completing the information collection process will no longer be available once the approval to collect the data via USCIS' Electronic Immigration System (USCIS ELIS) is approved as this will be the new e-filing option for the form.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

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. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

This collection of information does not have an impact on small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If we do not collect this information, a lawful permanent resident will not be able to replace his or her Permanent Resident Card.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government**

**contract, grant-in-aid, or tax records for more than three years;**

- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

On April 26, 2019 USCIS published a 60-day notice in the Federal Register at 84 FR 17870. USCIS received 4 comments after publishing that notice. Two of the comments did not address the information collection or request any changes to the form or instructions. Responses to the additional two comments are provided on Appendix: I-90 Public Comments and Responses Matrix

On July 17, 2019, USCIS published a 30-day notice in the Federal Register at 84 FR 34196. USCIS did not receive comments any comments to date.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

USCIS does not provide any payment for benefit sought.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.**

There is no assurance of confidentiality. The System of Records Notices associated with this information collection are:

- DHS/USCIS/ICE/CBP-001 Alien Tracking, Index, and National File Tracking System
- DHS/USCIS-007 Benefits Information System
- DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records

The associated Privacy Impact Assessment are:

- DHS/USCIS/PIA-056 USCIS ELIS
- DHS/USCIS/PIA-071 myUSCIS Account Experience

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for**

**collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

		A	B	C (=AxB)	D	E (=Cx D)	F	(=ExF)
Type of Respondent	Form Name / Form Number	#. of Respondents	#. of Responses per Respondent	# of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
Individual or households	Application to Replace Permanent Resident Card / I-90 (paper)	444,601	1	444,601	2	889,202	\$35.78	31,815,648
Individual or households	Application to Replace Permanent Resident Card / I-90 (electronic)	296,400	1	296,400	1.59	471,276	\$35.78	16,862,255
Individual or households	Biometric Processing	741,001	1	741,001	1.17	866,971	\$35.78	31,020,222
Total				741,001		2,227,449		79,698,125

*\* The above Average Hourly Wage Rate is the May 2017 Bureau of Labor Statistics average wage for all occupations of \$24.34 times the wage rate benefit multiplier of 1.47 (to account for benefits provided) equaling \$35.78. The selection of "All Occupations" was chosen as the expected respondents for this collection could be expected to be from any occupation.*

**NOTES ON BURDEN:**

The above estimated burden per response for the paper version of the I-90 includes the time necessary to read all instructions for the form, gather all documents required to complete the collection of information, obtain translated documents if necessary, obtain the services of a preparer if necessary, and complete the form.

The above estimated burden per response for the ELIS electronic version of the I-90 includes the time necessary to read all instructions for the form, gather all documents required to complete the collection of information, obtain translated documents if necessary, obtain the services of a preparer if necessary, and complete, in the electronic version of the form, only those questions related to the program functionality of the

information collection and not the biographical questions such as name, address, etc. The burden per response for the biographical questions answered via the ELIS electronic submission process is reported in OMB Control Number 1615-0122.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
  - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
  - **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995; (2) to achieve regulatory compliance with requirements not associated with the information collection; (3) for reasons other than to provide information or keep records for the government; or, (4) as part of customary and usual business or private practices.**

There are no capital, start-up, operational or maintenance costs associated with this collection of information. For informational purposes only, the filing fee for Form I-90 is \$455 plus a biometrics service fee of \$85, for a total of \$540.

USCIS estimates that Form I-90 respondents will incur some out of pocket costs as a result of responding to this collection of information. Costs may include payments for document translation and preparation services, attorney and legal fees, postage, and costs

associated with gathering documentation. USCIS estimates the average cost of this information collection may vary widely, from as little as \$20 to \$1,000 per respondent. USCIS estimates that the average cost for these activities is \$343 and that approximately 100 percent of the total respondent population may incur this cost. The estimated out of pocket cost to respondents is 741,001 multiplied by 100 percent multiplied by \$343, which equals \$254,163,343.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

USCIS establishes its fees using an activity-based costing model to assign costs to an adjudication based on its relative adjudication burden and use of USCIS resources. Fees are established at an amount that is necessary to recover these assigned costs, plus an amount to recover unassigned overhead (which includes the clerical, officer, and managerial time with benefits) and immigration benefits provided for free. As a consequence of USCIS immigration fees being based on resource expenditures related to the benefit in question, USCIS uses the fee associated with an information collection as a reasonable measure of the collection's costs to the agency. The filing fee for Form I-90 is \$455, which is paid by all regular I-90 applicants. A biometric services fee of \$85 is also paid by all regular I-90 applicants. The total estimated cost to the Federal government is calculated by multiplying \$455 by the estimated total number of respondents (741,001), which equals \$337,155,455 and adding that product to the \$85 biometric services fee multiplied by the estimated number of respondents who will pay that fee (741,001), which equals \$62,985,085. The total estimated cost to the Federal government is \$400,140,540.

- 15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.**

Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New) [new minus current]	Difference
I-90 (paper)	849,272	889,202	39,930			
I-90 (electronic)	463,675	471,276	7,601			
Biometric Processing	949,838	866,971	(82,867)			
<b>Total(s)</b>	<b>2,262,785</b>	<b>2,227,449</b>	<b>(35,336)</b>			

The total estimated annual hour burden for this collection of information decreased from 2,262,785 to 2,227,449 due to both programmatic changes and adjustments in agency estimates. The decrease in the estimated number of respondents was due to a new USCIS annual projection. For the I-90 (paper), the estimated average time burden per response has been increased from 1.75 hours to 2 hours, and for the I-90 (electronic), the estimated hour burden per response has been increased from 1.42 hours to 1.59 hours. USCIS revised this information collection form to include additional data elements related to Port-of-Entry Commuters foreign mailing address, alternate and/or safe mailing address for VAWA, T nonimmigrants, and special immigrant juveniles. Additional questions were added under “Part 3. Processing Information” to better understand the applicant’s activities outside the U.S. since he/she was granted permanent resident status. The form instructions were also revised to add a new section: “What Evidence Must You Submit?” based on requirements set by 8 CFR 103.2(b)(1), new language to the Biometrics Service Appointment section for members of the U.S. military who are temporarily out of the U.S., and clarifying language regarding the filling of Form I-751, Petition to Remove Conditions on Residence. For additional information about changes made to the form and instructions, please see draft documents and table of changes.

Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New) [new minus current]	Difference
I-90 (paper + electronic)				\$278,457,690	\$254,163,343	(\$24,294,347)
<b>Total(s)</b>				<b>\$278,457,690</b>	<b>\$254,163,343</b>	<b>(\$24,294,347)</b>



USCIS is reporting a decrease to the estimated annual cost burden for this collection of information. As a result of a reevaluation of the estimated cost burden to respondents, the total estimated annual cost burden for this collection of information has decreased.

- 16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

This information collection will not be published for statistical purposes.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

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

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.**

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

- B. Collections of Information Employing Statistical Methods.**

There is no statistical methodology involved with this collection.