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[Docket \(/docket/USCIS-2005-0035\)](/docket/USCIS-2005-0035) / [Document \(USCIS-2005-0035-0194\) \(/document/USCIS-2005-0035-0194\)](/document/USCIS-2005-0035-0194)
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Comment Submitted by John Flanagan

Posted by the **U.S. Citizenship and Immigration Services** on Jul 8, 2022

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Comment

The Paperwork Reduction Act is obviously a misnomer, as it has allowed USCIS to turn what used to be a one-page form into a nine-page monstrosity. USCIS has not provided any reasoning whatsoever for reformatting this form, and the changes it has made are confusing or fail to take into account recent federal injunctions.

For example, on page 2, if someone is filing a non-VAWA application and doesn't require a safe address, do they still answer "YES" on Part 2, Item 4?

Meanwhile, on pages 3-4, in Part 3 (Item 3), there are a bunch of questions for the C08 EAD category that are no longer relevant because those asylum eligibility rules have been enjoined by the Asylumworks litigation. There should at least be some acknowledgement of that on the form or in the instructions; applicants arguably don't need to answer these questions anymore.

Relatedly, the instructions contain legally incorrect information about C08 EAD eligibility, such as the provision that applicants need to wait 365 days to apply for a C08 EAD. This disadvantages pro se applicants who are not aware that this rule has been enjoined. USCIS should clearly disclose that this illegal rule has been stopped in court and no longer applies.

Comment ID

USCIS-2005-0035-0199



Tracking Number

l5c-m63g-zq82

Comment Details

Received Date

Jul 8, 2022



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