

Form G-325R-002 Revision - Responses to Public Comments

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Paperwork Reduction Act

a. Concerns Regarding Lack of Clarity in Form G-325R or Collection Process

Comment: Many commenters criticized the form or the collection process for lack of clarity.¹ A few commenters stated that the IFR does not address what would occur if an immigrant lacked certain information required for Form G-325R, which the commenters warned could create compliance issues.² Several commenters expressed opposition to the form for lacking instructions, definitions, or guidance.³ A commenter described the G-325R as a lengthy form with no online instructions and complicated, time-consuming questions,⁴ while another commenter wrote that counsel who might be asked to advise citizens would have no guidance on how to do so.⁵

Several commenters wrote that Form G-325R seeks to collect overly broad information.⁶ A commenter described the questions on Form G-325R as freeform, overly broad, without clear intent, and “impossible to answer.” The commenter recommended that if DHS does not rescind this regulation in its entirety, it should eliminate the overly broad questions on the form.⁷

¹ [USCIS-2025-0004-0006](#); [USCIS-2025-0004-0197](#); [Immigrant Legal Resource Center](#); [National Immigration Project](#); [Massachusetts Immigrant and Refugee Advocacy Coalition](#); [Immigrant Justice Corps](#); [Michigan State University College of Law Immigration Clinic](#); [World Relief Corporation of National Association of Evangelicals](#); [American Friends Service Committee - NH Program](#); [Just Neighbors](#); [USCIS-2025-0004-0756](#); [USCIS-2025-0004-2827](#); [USCIS-2025-0004-4006](#).

² [USCIS-2025-0004-0006](#); [USCIS-2025-0004-0197](#); [Michigan State University College of Law Immigration Clinic](#).

³ [Immigrant Legal Resource Center](#); [National Immigration Project](#); [World Relief Corporation of National Association of Evangelicals](#); [USCIS-2025-0004-4006](#); [Just Neighbors](#).

⁴ [Just Neighbors](#).

⁵ [National Immigration Project](#).

⁶ [Massachusetts Immigrant and Refugee Advocacy Coalition](#); [American Friends Service Committee \(AFSC\)](#); [National Immigration Project](#); [Immigrant Justice Corps](#); [USCIS-2025-0004-2978](#).

⁷ [National Immigration Project](#).

Response: DHS notes that the associated instructions and guidance on completing the Form G-325R are imbedded within the online environment and are accessible while completing the form online. DHS added instructional content to provide clarity on the form, including intended use and who should and should not submit the Form G-325R registration. In addition, for additional information about the registration requirements in the statute, including the legal background, USCIS included guidance on the public USCIS website on the “Alien Registration Requirement” web page (<https://www.uscis.gov/alienregistration>) for more information on registration.

Comment: A few commenters described particular confusions the intended audience of the information collection process would face.⁸ Some commenters expressed concerns that Form G-325R would intimidate potential registrants, writing that the information requested regarding spouses and parents bears no relation to the purported information collection.⁹ Similarly, a couple of the commenters wrote that the questions are “tricky” and applicants may not have the information to answer.¹⁰ One commenter described the questions on the form as irrelevant.¹¹ A different commenter wrote that Form G-325R would be especially confusing, vague, and difficult for immigrant families to fill out, causing needless intimidation.¹² One of the commenters stated that the IFR makes no provisions for age-appropriate information or guidance

⁸ [Immigrant Justice Corps; American Friends Service Committee \(AFSC\); Caring Across Generations; USCIS-2025-0004-2827.](#)

⁹ [Immigrant Justice Corps; American Friends Service Committee \(AFSC\).](#)

¹⁰ [USCIS-2025-0004-1641; USCIS-2025-0004-4006.](#)

¹¹ [USCIS-2025-0004-0756.](#)

¹² [Caring Across Generations.](#)

related to the many mandatory questions on Form G-325R. ¹³The commenter concluded that the form should be rescinded.¹⁴

A commenter said that the G-325R's questions are overly broad and vague, representing a "blatant overreach" by DHS.¹⁵

Response: DHS disagrees with the commenters that the information collected on Form G-325R is irrelevant or not related to the registration requirements. DHS also disagrees that the G-325R's questions are broad and represent blatant overreach. The information requested on Form G-325R includes the information required under section 264(a) of the INA, 8 U.S.C. 1304(a), including the date and place of entry of the alien into the United States, activities in which the alien has been and intends to be engaged, the length of time the alien expects to remain in the United States, the police and criminal record, if any of the alien, and any additional matter as may be prescribed by the Secretary. The form instructions provide helpful guidance. For additional information about the registration requirement, registrants may also find helpful information on USCIS' website, including a PDF copy of the Form G-325R.

The information requested is within the control of the applicant. Many immigration forms are completed by minors or aliens who have limited English proficiency or other language access barriers. USCIS provides some information in other languages, however, an applicant must file a form in the English language.¹⁶

¹³ The commenter provided that the information required for registration may be either unavailable or incomprehensible to children between the ages of 14 and 18 years old, including to UACs and especially those in Federal government custody. The commenter indicated that children 14 years or older may have been very young when they entered the United States and may not easily be able to access their immigration history, such as the date of arrival.

¹⁴ [American Friends Service Committee \(AFSC\).](#)

¹⁵ [American Friends Service Committee \(AFSC\).](#)

¹⁶ USCIS does provide Form I-9, Employment Eligibility Verification, in the Spanish language. See USCIS, Form I-9, "I-9, Employment Eligibility Verification," <https://www.uscis.gov/i-9> (last updated Apr. 2, 2025).

The registration form is available to all aliens regardless of status, in addition to the other forms already listed in the regulations as registration forms. Those forms contain similar questions as Form G-325R and also allow aliens to satisfy the registration requirements. By establishing this general registration form and process, DHS is faithfully executing the alien registration requirement.

Comment: Commenters stated that Form G-325R does not appear to have any option for an attorney to make an appearance via filing Form G-28, as Form G-325R can only be prepared on the foreign national's myUSCIS account.¹⁷

Response: Form G-325R must be submitted through the unregistered alien's my USCIS online account. If an unregistered alien is represented by an attorney or accredited representative, the alien should upload the completed and signed Form G-28 as evidence. In regards to providing attachments to the Form G-325R, the myUSCIS system allows aliens to upload evidence or documents, such as:

- Completed and signed Form G-28, Notice of Entry of Appearance of Attorney or Accredited Representative;
- Certified police and court records for any criminal charges, arrests, or convictions you may have, as well as any evidence of a pardon, amnesty, rehabilitation decree, or other act of clemency; or
- Any additional documents to support your registration or provide an explanation for any information contained in your form.

¹⁷[The American Immigration Lawyers Association and The American Immigration Council.](#)

Comment: A commenter wrote that the structure of Form G-325R is likely to cause considerable confusion among registrants. The commenter said that the form requests detailed information not only about the applicant but also about their parents and spouse without explaining how this data is relevant to registration. The commenter said that in many sections, registrants may make errors (including inadvertent omissions, mischaracterizations, or misinterpretations) due to lack of clarity whether a question is mandatory or optional, questions that are too broad and vague, and questions that require responses within a 500-character limit while failing to define the expected scope of the answer. The commenter wrote that risk of harm from such errors is further heightened by the Department’s stated intent to apply criminal fraud penalties for incorrect responses and added that this risk is “unacceptably high” and places an unreasonable burden on the public.¹⁸

Other commenters remarked that the form contains questions which lack instructions clarifying how much information should be provided for each answer, including: “What activities have you been engaged in while in the US?” and “What activities do you expect to do before you leave?” The commenters said that the response box appears to have a 500-character limit and would therefore seem to be asking for a brief description, yet is accompanied by questions that the commenters characterized as lacking specificity, overbroad, and speculative in nature.¹⁹

Response: The information requested on Form G-325R includes the information required under section 264(a) of the INA, 8 U.S.C. 1304(a), including the date and place of entry of the alien into the United States, activities in which the alien has been and intends to be engaged, the length

¹⁸ [Center for Human Rights and Constitutional Law.](#)

¹⁹ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

of the time the alien expected to remain in the United States, the police and criminal record, if any of the alien, and any additional matter as may be prescribed by the Secretary. The questions regarding information on an alien's family is for identity verification purposes, similar to other applications and petitions that require the collection of information by USCIS.

DHS added instructional content to provide clarity on the form and aliens may find additional information about the registration requirement on the public USCIS website on the "Alien Registration Requirement" web page (<https://www.uscis.gov/alienregistration>). For responses that are greater than the character limit of the online form, the alien may use the additional information field or upload evidence or documents that the alien may want to provide to USCIS.

Comment: Commenters wrote that the requirement on Form G-325R to list all addresses over a 5-year period goes beyond the kind of information that is referenced in the INA. The commenters said that the INA directed that forms gathering information "contain inquiries with respect to: (1) the date and place of entry of the alien into the United States; (2) activities in which he has been and intends to be engaged; (3) the length of time he expects to remain in the United States; (4) the criminal record, if any, of such alien; and (5) such additional matters as may be prescribed by the Commissioner, with the approval of the Attorney General." The commenters further remarked that there is no relevance to requiring information of where someone has lived for the last 5 years to this "limited" scope and said that completing that history may be particularly difficult for applicants who may have served in the military, relocated frequently, or have experienced poverty. The commenters said that this requirement could lead to inadvertent inaccuracies, which DHS might then characterize as intentional

misrepresentation or fraud and added that form does not provide an opportunity in the address section to explain a gap in address history or an inability to recall specific locations and dates of residence.²⁰

Response: The information collected on a Form G-325R is relevant to the registration and supports the collection of information as directed by section 264(a) of the INA, 8 U.S.C. 1304(a), including questions on an alien's date and place of entry of the alien into the United States; activities in which he has been and intends to be engaged; length of time he expects to remain in the United States; police and criminal record, if applicable; and the additional matters as may be prescribed by the Secretary. *See* section. 264(a) of the INA, 8 U.S.C. 1304(a). Therefore, DHS disagrees that the information collected goes beyond what is authorized in the statute or that the information is not relevant to registration. Regarding an alien's difficulties providing the information, if an alien has difficulties completing the form, and , for example, he or she has to research a particular data item, the myUSCIS system permits saving of drafts as registrants complete the form. Additionally, if an alien wants to provide additional information or an explanation, the alien may provide it in the Additional Information section.

Comment: Commenters said that the Form G-325R creates further confusion with the way in which it requests information about the individual's arrival date, immigration status, and I-94. The commenters²¹ wrote that many registrants have already encountered an issue with the Form G-325R when trying to list their immigration status at last arrival, because the only drop-down selections provided by the form is "Entered Without Inspection (EWI)," or leaving the section

²⁰[The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

²¹[Center for Human Rights and Constitutional Law.](#)

blank, and added that there is no clear instruction on how to complete the form if the registrant did not enter “EWI.”²² The commenters said that listing “EWI” as the only selection is incorrect and induces many individuals who are registering to provide incorrect information under oath, as someone who entered as a visitor or other nonimmigrant category or based on an immigrant visa may not understand or appreciate the impact of this being the only selection and may select “EWI.” The commenters also voiced concern about leaving information blank without explicit permission to do so in this instance, as the commenter said that in the first Trump Administration, applications were rejected or denied if a response was left blank, even when it was not relevant to the individual.²³ Another commenter added that because the form only offers one option for the field “Immigration status at last arrival,” “EWI – Entry Without Inspection,” the commenter stated that any alien submitting the form is necessarily admitting the commission of at least one crime.²⁴

The commenters voiced concern that similarly, the G-325R asks for the registrant’s current I-94 number, which the commenters characterized as confusing because someone who has been issued an I-94 is normally viewed as having already complied with the registration requirement. The commenters stated that gathering this information on the form is therefore inconsistent with the instructions on the USCIS website about who must register but also gathers information that DHS should already have obtained. The commenters wrote that the drop-down menu used to select one’s status is unclear whether all potential immigration status options are available.²⁵

²² [Center for Human Rights and Constitutional Law.](#)

²³ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

²⁴ [Ayuda.](#)

²⁵ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

The commenters said that with several nonimmigrant statuses, such as F-1, J-1, and M-1, individuals are present in the United States for the duration of status, yet stated that with the form field restricted to month, date and year, it appears that there is no section to list the duration of status in the form. The commenters voiced concern that this limitation would result in gathering inaccurate information, which may cause the respondent to suffer negative consequences.

Response: Commenters correctly indicate that if an alien is issued a Form I-94, the alien is registered and would not have to complete an additional Form G-325R. However, an alien who was issued a Form I-94 and who subsequently turns 14 years of age while present in the United States, is required to register and be fingerprinted (unless waived) within 30 days of his or her turning 14 years of age. DHS modified the question to add “if any” and the instructions to add clarification on the re-registration requirements.

DHS is aware of the limited responses provided in the dropdown field, specifically for the question regarding “Immigration status at last arrival.” DHS is resolving this issue to provide aliens more options to select the applicable immigration status at the time of an alien’s last arrival. Regarding the limits in the date field for the expiration date of an alien’s period of authorized stay as shown on his or her Form I-94, DHS is adding a checkbox to Form G-325R for aliens to select duration of status, D/S, if they were admitted for duration of status.

Comment: The commenters wrote that the form is unclear in its instructions about who is required to complete the registration process and said that even experienced immigration attorneys have differing views about who is required to register. The commenters remarked that the initial instructions state that foreign nationals admitted into the United States with immigrant or nonimmigrant status are already registered, while the form raises the circumstance of someone

who enters in such status and later turns 14 years of age as a person who is required to register. The commenters also voiced concern that DHS has created confusion by not addressing fingerprinting separately from registering.²⁶

Response: DHS revised the instructional content to provide clarity on the form, including who should and should not submit the Form G-325R registration. In addition, for additional information about the registration requirements, including the legal background, USCIS included guidance on the public USCIS website on the “Alien Registration Requirement” web page (<https://www.uscis.gov/alienregistration>).

Comment: Another commenter said that clarification is needed regarding how the new form and related biometric collection would interact with existing data collected through other immigration programs, adding that applicants should not be required to submit the same information multiple times if it can be avoided. The commenter wrote that USCIS should implement procedures to minimize redundancies and reduce administrative burden, reducing overlap would not only improve processing times but also enhance applicants’ confidence in the system’s efficiency.²⁷

Response: The IFR and this rule is limited in scope to establish a general registration option available to all unregistered aliens regardless of immigration status to improve registration outcomes for certain groups of aliens. An alien who has been issued one of the documents designated as evidence of registration under 8 CFR 264.1(b) has already registered, and an alien who has submitted one of the forms designated at 8 CFR 264.1(a) and provided fingerprints

²⁶ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

²⁷ [USCIS-2025-0004-4258.](#)

(unless waived), but was not issued one of the evidence of registration designated at 8 CFR 264.1(b), has complied with the registration requirement of section 262 of the INA, 8 U.S.C. 1304(a). If an alien does not have any other pathway to register and to be fingerprinted, the alien may file the Form G-325R to comply with their duty under section 262 of the INA, 8 U.S.C. 1302.

b. Language Access Concerns

Comment: Many commenters expressed opposition to the collection process on the basis that the IFR fails to consider its disproportionate impacts on people with limited English proficiency or other language barriers.²⁸ A commenter wrote that DHS has not announced any plans to provide instructions, guidance, or the G-325R form in non-English languages, and the notice was silent on how individuals with limited English proficiency could be expected to comply with the new IFR registration requirement.²⁹ Another commenter cited studies and stated that nearly half of all immigrant adults in the United States have limited English skills, describing the lack of discussion of the language access barrier as “a preposterous oversight.”³⁰ A commenter described difficulties with registration compliance in the NSEERS program, writing that these issues resulted partially from language access issues.³¹ A commenter wrote that the IFR fails to consider its effects on children with limited English abilities.³² A commenter described the form

²⁸ [Rocky Mountain Immigrant Advocacy Network; USCIS-2025-0004-0391; American Friends Service Committee \(AFSC\); Immigrant Justice Corps; New York Immigration Coalition; Ayuda; The American Immigration Lawyers Association and The American Immigration Council; Spring Institute for Intercultural Learning; Michigan Immigrant Rights Center; Make the Road New Jersey; Acacia Center for Justice; DePaul Asylum and Immigration Law Clinic; USCIS-2025-0004-3288; USCIS-2025-0004-4105.](#)

²⁹ [Ayuda.](#)

³⁰ [Rocky Mountain Immigrant Advocacy Network.](#)

³¹ [DePaul Asylum and Immigration Law Clinic.](#)

³² [USCIS-2025-0004-2394 \[Form Letter Master\].](#)

being available only in English as a discriminatory attempt to prevent some immigrants from being able to comply with the requirement.³³

Commenters expressed concern that the lack of language access would lead to errors and potential enforcement consequences.³⁴ A commenter wrote that many people would be unable to read or respond to Form G-325R in a meaningful way in English and that others would miss the registration window and face fines and criminal prosecution solely based on language access, despite their best intentions.³⁵

Expressing similar concerns, a couple of commenters expressed concerns that language barriers could lead to exploitation during the information collection process.³⁶ A commenter stated that vague and confusing processes create opportunities for bad actors to take advantage of client vulnerabilities by charging unconscionable fees to “help” them with these processes.³⁷ A commenter remarked that the registration rule makes no attempt to provide language access, ensuring that many clients would have errors or incorrect information in their forms, which could be used against them.³⁸

Several commenters expressed legal concerns related to language access.³⁹ A few of these commenters remarked that the IFR does not account for any translation of Form G-325R or the rule itself, which they described as an implication of Federal Government obligations under the Rehabilitation Act of 1973 and the Civil Rights Act.⁴⁰ A commenter wrote that the IFR’s

³³ [USCIS-2025-0004-0391](#).

³⁴ [Central American Refugee Center \(CARECEN-NY\); Florence Immigrant & Refugee Rights Project; Hispanic Federation](#).

³⁵ [Central American Refugee Center \(CARECEN-NY\)](#).

³⁶ [Make the Road New Jersey; Florence Immigrant & Refugee Rights Project](#).

³⁷ [Make the Road New Jersey](#).

³⁸ [Florence Immigrant & Refugee Rights Project](#).

³⁹ [Hispanic Federation; LatinoJustice PRLDEF; National Immigrant Justice Center; Acacia Center for Justice; Young Center for Immigrant Children’s Rights](#).

⁴⁰ [Hispanic Federation; National Immigrant Justice Center; Acacia Center for Justice](#).

failure to provide non-English language services would effectively establish “pretextual criminalization” of thousands of immigrants with limited English proficiency who might unintentionally make mistakes on their applications or find themselves unable to complete the registration process.⁴¹ Similarly, a commenter stated that the IFR violates equal protection principles by only making Form G-325R available in English.⁴²

Another commenter voiced concern that “undocumented persons” who are given the registration form may have a language barrier or other disadvantage to understanding how it is “essentially[] self-incrimination.”⁴³

Response: With this IFR and final rule, as always, DHS strives to be fair and efficiently execute the immigration laws established by Congress. DHS notes that USCIS’ immigration forms are offered and must be submitted in English.⁴⁴ USCIS also provides a PDF copy of Form G-325R for aliens to access before completing the form.⁴⁵ An alien may use the assistance of an interpreter for reading the instructions and questions on the new registration form. If the alien uses an interpreter, he or she must provide the contact information of that interpreter and upload the interpreter’s certification and signature when applying for registration.

In addition to the rulemaking actions to publicize information on the alien registration requirement, USCIS established a dedicated website with information on the ARR and an ARR Tool that may help aliens determine whether they must register.

⁴¹ [Hispanic Federation.](#)

⁴² [LatinoJustice PRLDEF.](#)

⁴³ [USCIS-2025-0004-4224.](#)

⁴⁴ The exception to this general rule is the Form I-9, Employment Eligibility Verification, which is offered in the Spanish language. *See* USCIS, Form I-9, “I-9, Employment Eligibility Verification,” <https://www.uscis.gov/i-9> (last updated Apr. 2, 2025). USCIS also has a Multilingual Resource Center, <https://www.uscis.gov/tools/multilingual-resource-center>, and a website in Spanish, <https://www.uscis.gov/es/herramientas/centro-de-recursos-multilingues>. USCIS strives to include as much information as possible on these websites.

⁴⁵ *See* Form G-325R, “G-325R, Biographic Information (Registration),” <https://www.uscis.gov/forms/all-forms/g-325r> (last updated Apr. 11, 2025).

c. Fifth Amendment and Self-Incrimination Concerns

Comment: Several commenters raised Fifth Amendment concerns related to Form G-325R.⁴⁶

One of the commenters generally asked whether people would have the right to “plead the Fifth” on the form.⁴⁷ Commenters articulated that failing to fully complete the registration form could protect a registrant from some aspects of self-incrimination but still likely amount to a criminal offense under 8 U.S.C. 1306(a).⁴⁸ A commenter expressed concerns that immigrants may be “set up” to be accused of future misrepresentation for not fully providing answers to incomprehensible questions, characterizing the questions on Form G-325R as “trap questions.”⁴⁹ Commenters discussed concerns that registrants could inadvertently provide information that could be used as evidence to prosecute the claimant for a Federal crime, citing Supreme Court precedent establishing that the privilege against self-incrimination extends to administrative proceedings and registration requirements.⁵⁰

A commenter similarly raised self-incrimination concerns for Form G-325R for aliens who are not otherwise registered on another form. The commenter cited the Supreme Court’s ruling in *United States v. Sullivan*, 274 U.S. 259 (1927) that the Fifth Amendment does not protect someone from prosecution for refusing to file an income tax return if required by law; however, the person can claim the privilege against self-incrimination on the return if disclosures called for by the return are privileged. The commenter suggested that since Form G-325R is compulsory, similar to income tax returns, aliens should be allowed to claim this privilege for

⁴⁶ [National Immigration Project](#); [USCIS-2025-0004-0010](#); [USCIS-2025-0004-0038](#); [Massachusetts Immigrant and Refugee Advocacy Coalition](#); [Immigrant Justice Corps](#); [LatinoJustice PRLDEF](#); [AFL-CIO](#); [Center for Human Rights and Constitutional Law](#).

⁴⁷ [USCIS-2025-0004-0010](#).

⁴⁸ [The American Immigration Lawyers Association and The American Immigration Council](#).

⁴⁹ [National Immigration Project](#).

⁵⁰ [The American Immigration Lawyers Association and The American Immigration Council](#).

questions on the Form G-325R form that may be self-incriminating. The commenter raised concern that since respondents can only file the initial Form G-325R online, they cannot hand-write a claim of privilege next to a question, forcing the respondent to either answer the question or not file the form. Thus, the commenter suggested that, under the Fifth Amendment, the respondent should not be forced to make this choice. While providing specific suggestions to address self-incrimination concerns on Form G-325R, the commenter proposed that the required questions on the form should be reviewed for issues of potential self-incrimination.⁵¹

Another commenter wrote that while other immigration forms similarly ask about criminal activity, those are voluntary forms completed to receive immigration benefits, so aliens are not compelled to self-incriminate, whereas the Form G-325R is mandatory, all of its fields are mandatory, and it confers no benefits to registrants.⁵²

Several other commenters similarly remarked on the distinction that the Form G-325R is not a benefit requirement, unlike other immigration forms where those who submit a benefit form are affirmatively seeking to meet a burden and retain the ability to exercise their Fifth Amendment right to not be compelled to self-incriminate. The commenters further stated that, in contrast, the IFR seeks to establish the Form G-325R, with its mandatory questions, as an obligation for potentially millions of aliens in the United States. They concluded that Form G-325R would effectively nullify the Fifth Amendment rights of aliens.⁵³

Another commenter pointed to questions about address history, last arrival information, and Form I-94 information as problematic under the Fifth Amendment.⁵⁴ A commenter detailed

⁵¹ [USCIS-2025-0004-0038](#).

⁵² [Rocky Mountain Immigrant Advocacy Network; Immigrant Justice Corps; Immigration Center for Women and Children \[Form Letter Master\]](#).

⁵³ [LatinoJustice PRLDEF; Acacia Center for Justice; AFL-CIO; Oasis Legal Services; National Immigrant Justice Center; World Relief Corporation of National Association of Evangelicals; USCIS-2025-0004-0266](#).

⁵⁴ [The American Immigration Lawyers Association and The American Immigration Council](#).

that Form G-325R contains many mandatory questions about the registrant's immigration history that might reveal inculpatory information of migration-related Federal offenses.⁵⁵ A commenter expressed concern that the online collection process permits registrants to upload evidence, such as criminal records, without any explanation. The commenter wrote that registrants may unknowingly upload self-incriminating documents. The commenter recommended that if DHS does not rescind this regulation in its entirety, it should provide detailed instructions on attachments.⁵⁶

Numerous commenters expressed the general concern that the disclosures required by the Form G-325R, such as the requirement to report past criminal activity, would violate the Fifth Amendment right against self-incrimination,⁵⁷ would place aliens in a position of identifying themselves for purposes of enforcement,⁵⁸ or would generally violate Fifth Amendment rights.⁵⁹

Commenters remarked that virtually any alien who completes Form G-325R would be admitting facts tantamount to criminal liability under 8 U.S.C. 1325 concerning illegal entry⁶⁰ or a Federal misdemeanor⁶¹ or other criminal activity not already on record.⁶² Commenters also stated that the design of Form G-325R ensures that an alien filling it out would necessarily have

⁵⁵ [Immigration Center for Women and Children \[Form Letter Master\]](#).

⁵⁶ [National Immigration Project](#).

⁵⁷ [Massachusetts Immigrant and Refugee Advocacy Coalition; The Justice Diversity Center of the Bar Association of San Francisco \(JDC\); Immigrant Justice Corps; Coalition for Humane Immigrant Rights \(CHIRLA\); Young Center for Immigrant Children's Rights; Diocesan Migrant and Refugee Services dba Estrella del Paso; LatinoJustice PRLDEF; Acacia Center for Justice; National Immigrant Justice Center; World Relief Corporation of National Association of Evangelicals; USCIS-2025-0004-0019; USCIS-2025-0004-0025; USCIS-2025-0004-0027; USCIS-2025-0004-0028; USCIS-2025-0004-0044; USCIS-2025-0004-0057; Catholic Charities of Southern Colorado; USCIS-2025-0004-0144; USCIS-2025-0004-0310; USCIS-2025-0004-0324; USCIS-2025-0004-0352; USCIS-2025-0004-0382; USCIS-2025-0004-0387; USCIS-2025-0004-0389; USCIS-2025-0004-0391; USCIS-2025-0004-0392; USCIS-2025-0004-0439; USCIS-2025-0004-0458.](#)

⁵⁸ [USCIS-2025-0004-0013](#).

⁵⁹ [USCIS-2025-0004-0039; USCIS-2025-0004-0080; USCIS-2025-0004-0153; USCIS-2025-0004-0181; USCIS-2025-0004-0217; USCIS-2025-0004-0389; USCIS-2025-0004-0426; USCIS-2025-0004-1011; USCIS-2025-0004-1198; USCIS-2025-0004-1301; USCIS-2025-0004-2722; USCIS-2025-0004-2732; USCIS-2025-0004-3348; USCIS-2025-0004-3409.](#)

⁶⁰ [AFL-CIO; USCIS-2025-0004-0057](#).

⁶¹ [USCIS-2025-0004-0019](#).

⁶² [Ayuda; DePaul Asylum and Immigration Law Clinic](#).

to implicate themselves in criminal activity, because the online form does not let the registrant leave any fields blank.⁶³ Another commenter stated that despite immigration law being civil, rather than criminal, the inquiry made by the registration requirement has become criminal because of the purposes and statements of the government, such as the statement in the E.O. “Protecting the American People Against Invasion,” that failure to comply with the registration requirement would be “treated as a civil and criminal enforcement priority,” and because the Form G-325R asks for information about past criminal offenses.⁶⁴

Several commenters specifically described Questions 3.2 (“Have you EVER committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime, or convicted)?”) and 3.5 (“Have you EVER violated (or attempted or conspired to violate) any controlled substance law or regulation of a State, the United States, or a foreign country?”) as problematic under the Fifth Amendment.⁶⁵ A commenter articulated that the options for these questions are “Yes” or “No” and the questions are marked as required. The commenter said that a “Yes” answer to these questions would be self-incriminating, and, therefore, a person should be allowed to claim a Fifth Amendment privilege against answering this question, regardless of whether the true answer is “Yes” or “No.”⁶⁶ Another commenter proposed that either these questions be made optional, or a third response option be added to the questions, allowing respondents to explicitly claim a Fifth Amendment privilege and refuse to answer the question.⁶⁷

A couple of commenters wrote that unlike immigration benefit applications, which are voluntary, submission of Form G-325R is mandatory, magnifying the “coercive nature” of

⁶³ [Oasis Legal Services; USCIS-2025-0004-4053.](#)

⁶⁴ [DePaul Asylum and Immigration Law Clinic.](#)

⁶⁵ [AFL-CIO; National Immigration Project; USCIS-2025-0004-0038; The American Immigration Lawyers Association and The American Immigration Council; DePaul Asylum and Immigration Law Clinic; Immigration Center for Women and Children \[Form Letter Master\].](#)

⁶⁶ [USCIS-2025-0004-0038; National Immigration Project.](#)

⁶⁷ [USCIS-2025-0004-0038.](#)

criminal history disclosures on the form. The commenters added that such compelled disclosures directly conflict with State laws that protect the privacy and advance the rehabilitation of individuals with sealed or expunged records and raise serious Fifth Amendment concerns.⁶⁸

Other commenters wrote that the compulsion to disclose sealed or expunged records contradicts the intent of State laws to recognize and encourage rehabilitation and ensure fundamental fairness. The commenters also said that by requiring registrants to disclose any arrests that did not lead to conviction, the form is likely to result in prejudicial treatment of applicants with no formal finding of guilt, further stating that a core principle of law in the United States is that individuals are innocent until proven guilty, not guilty by virtue of being charged. Finally, the commenters wrote that the question asking whether a registrant has ever committed a crime “whether or not” they have been arrested, charged, cited, tried, or convicted is a direct violation of the protections against self-incrimination provided by the Fifth Amendment. The commenters said that as detailed in the American Immigration Lawyers’ Association’s April 11, 2025, comment on the IFR, the questions on the G-325 create self-incrimination issues given their compulsory nature. Specifically, the commenters cited Question 3.2, which asks if the registrant has ever committed any crime for which they have not been arrested, convicted, etc., and Question 3.5, which inquires into past violations of controlled substance laws without limiting the question to convictions.⁶⁹

Response: The Fifth Amendment does not protect an alien from having to provide information relevant to the registration that is a condition of the alien’s presence in the United States, including information from passports, other documents, or statements regarding his or her

⁶⁸ [Center for Human Rights and Constitutional Law](#); [The American Immigration Lawyers Association](#); [Joint Comment Submitted by the Alliance for Immigration Survivors](#); [Rocky Mountain Immigrant Advocacy Network](#).

⁶⁹ [The American Immigration Lawyers Association](#); [Joint Comment Submitted by the Alliance for Immigration Survivors](#).

immigration status. *Rajah v. Mukasey*, 544 F.3d 427, 441 (2d. Cir. 2008). Forms for registration must inquire as to the existence of a criminal record. *See* section 264(a) of the INA, 8 U.S.C. 1304(a). The Fifth Amendment is not an impediment to the enforcement of a valid civil regulatory regime because: (1) the statements are not compelled for the purposes of the Fifth Amendment; and (2) the Fifth Amendment's act of production privilege does not cover records that are required to be kept pursuant to a civil regulatory regime. Instead, these inquiries are required by a civil statute in support of the civil regulatory regime. *See Rajah*, 544 F.3d at 442; *See* sections 262 and 264(a) of the INA, 8 U.S.C. 1302, 1304(a). DHS also notes that forms designated to register aliens should ask questions on an alien's date and place of entry of the alien into the United States; activities in which he has been and intends to be engaged; length of time he expects to remain in the United States; police and criminal record, if applicable. *See* section 264(a) of the INA, 8 U.S.C. 1304(a). DHS notes that many forms used to seek immigration benefits request information about the applicant's criminal history. *See, e.g.*, Form I-485, Application to Register Permanent Residence or Adjust Status, Part 9, Question 23; Form I-589, Application for Asylum and for Withholding of Removal, Part B, Question 2. The commenters state Form G-325R requests information about an alien's criminal history without granting an immigration benefit. But the same is true for other immigration forms that request information about an alien's criminal history because there is no guarantee that any immigration benefit application will be granted.

Comment: A commenter expressed concerns regarding questions of "How long do you expect to remain in the United States?" and "What is your expected date of departure (if any)?" The

commenter stated that immigrants might be caught in lengthy immigration backlogs and have great difficulty answering these questions, which might also entrap them.⁷⁰

Response: DHS notes that these questions are required questions that should appear as part of the registration scheme as prescribed by section 264(a) of the INA, 8 U.S.C. 1304(a). The alien may provide further explanation in either the question for “Additional Information,” or the alien may upload evidence or documents as part of his or her online filing of the Form G-325R.

Comment: Commenters expressed concern regarding the question about “activities,” describing it as particularly vague and arbitrary.⁷¹ A commenter expressed concern that Form G-325R’s inquiry into the activities that immigrants have engaged in while in the United States would chill their First Amendment rights to freedom of speech and association, as well as their rights under the National Labor Relations Act to organize and participate in labor unions. The commenter stated that many union members come from countries that deny freedom of association, and being compelled to report such membership to U.S. immigration authorities could lead to fear of retaliation.⁷²

Another commenter specifically mentioned that the disclosures required on Form G-325R contribute to this chilling effect by requiring members to list advocacy efforts that may be seen as opposing current government policy.⁷³

Another commenter expressed similar concerns that the Form G-325R would have a chilling effect on speech by requiring submitters to list advocacy efforts, and that this effect would be compounded by the administration’s other ongoing immigration enforcement actions,

⁷⁰ [National Immigration Project.](#)

⁷¹ [Immigrant Legal Resource Center; Immigrant Justice Corps.](#)

⁷² [AFL-CIO.](#)

⁷³ [Make the Road New York.](#)

such as its “efforts to suppress the speech of “noncitizen” students, professors, and others with disfavored views.”⁷⁴

Response: Section 264(a) of the INA, 8 U.S.C. 1304(a), requires that the Secretary, as part of the registration requirement, inquires about the activities in which the alien has been and intends to be engaged. DHS, as such, is required and authorized by law, to conduct such inquiries. DHS is committed to the First Amendment and other civil rights and freedoms granted by U.S. laws. There is no evidence that, by enforcing the congressional mandate, DHS is restricting free speech of aliens subject to registration, or an aliens’ rights under other laws of the United States, or that the implementation through an additional form of this longstanding statutory requirement would have a chilling effect on these rights.⁷⁵ Rather, the inquiries serve the legitimate interests advanced by Congress and as recognized and advanced by President Trump in E.O. 14159.

d. Privacy and Confidentiality Concerns

Comment: Several commenters raised concerns about privacy and confidentiality protections within the information collection process, particularly for survivors of domestic violence, trafficking, and other crimes.⁷⁶ Several of these commenters specifically stated that change of address requirements would create hardships for survivors.⁷⁷ Commenters wrote that while Form G-325R mentions safe addresses the IFR provides no definition of the term or clear guidance

⁷⁴ [National Immigration Law Center.](#)

⁷⁵ As it is the case with any other form submitted to USCIS, registrants are required to provide a response to the questions to the best of their knowledge and under the penalty of perjury. *See* certification section on Form G-325R.

⁷⁶ [Her Justice; The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\); Joint Comment Submitted by the Alliance for Immigrant Survivors; Valor US; World Relief Corporation of National Association of Evangelicals; Immigration Center for Women and Children \[Form Letter Master\]; Central American Resource Center of Northern California - CARECEN SF.](#)

⁷⁷ [Immigration Center for Women and Children \[Form Letter Master\]; The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\); World Relief Corporation of National Association of Evangelicals; Her Justice; Central American Resource Center of Northern California - CARECEN SF.](#)

outlining factors and situations that would be considered in determining whether delays are “reasonably excusable” and not willful, leaving survivors without needed clarity.⁷⁸ Similarly, a commenter stated that the IFR fails to address the special circumstances of victims in shelters and unsafe addresses. This commenter remarked that under USCIS special protections, applicants for VAWA’s T and U-based benefits are entitled to use safe mailing addresses and have their cases processed according to strict privacy rules, but the IFR includes no provisions related to procedures that would protect this data during the information collection process in conformity with heightened VAWA protections.⁷⁹ A commenter similarly described the IFR as silent on privacy and confidentiality protections associated with the registration requirement, despite existing protections under 8 U.S.C. 1367 for survivors applying for VAWA/T/U benefits. The commenter expressed concern that the information collection process could undermine these protections and put survivors at risk.⁸⁰ Describing a past data leak by the U.S. Government involving information on 6,000 asylum seekers, another commenter expressed concern regarding the “precarious nature” of sharing addresses with the U.S. Government.⁸¹ Another commenter urged DHS to provide clear guidance on safe addresses, allowing the use of P.O. boxes or alternative addresses, and to amend the IFR to consider it “reasonably excusable” when survivors cannot provide a physical address due to abuse.⁸²

Response: USCIS did not alter privacy or confidentiality protections or the requirements pertaining to changes of address. The confidentiality protections continue to align with those afforded to individuals under 8 U.S.C. 1367. The change of address requirements remain aligned

⁷⁸ [Immigration Center for Women and Children \[Form Letter Master\]](#); [World Relief Corporation of National Association of Evangelicals](#); [Her Justice](#).

⁷⁹ [The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\)](#).

⁸⁰ [Her Justice](#).

⁸¹ [Central American Resource Center of Northern California - CARECEN SF](#).

⁸² [Joint Comment Submitted by the Alliance for Immigrant Survivors](#).

with the processes and procedures for processing USCIS Form AR-11, Alien's Change of Address Card, which directs aliens in the United States to report any change of address to USCIS within 10 days of moving.

USCIS continues to follow all protections and procedures per 8 U.S.C. 1367 and affords protections such as safe addresses for all individuals within protected classes. A Form G-325R provides fields for an alien to provide a mailing or safe address and if different from his or mailing or safe address, to provide a physical address. As with all USCIS forms in which an alien may provide a safe address, if USCIS contacts the alien through the mail it will use the safe address that they provide, consistent with 8 U.S.C. 1367 protections; however, the Form G-325R process is entirely electronic at this time. All notices sent from USCIS to an alien are uploaded to the alien's myUSCIS account. None of the notices correlating to Form G-325R are issued via mail. Therefore, not only may aliens provide a safe address, consistent with longstanding USCIS practice, USCIS does not at this time send any documents through the mail in connection with Form G-325R.

Comment: One commenter wrote that the collection process lacks transparency about how specific data would be used, remarking that this could lead to data misuse, "mission creep," or erosion of trust in the immigration system.⁸³ Similarly, a commenter remarked that the Form G-325R contains links to several systems of record notices but does not specify how they are related to the information collection. This commenter remarked that the form states that DHS may share the information, as appropriate, for law enforcement purposes or in the interest of

⁸³ [USCIS-2025-0004-2978](#).

national security but warned that any DHS disclosure of information must comport with 8 U.S.C. 1367 and related guidance.⁸⁴

Another commenter said that there are no provisions limiting the use or distribution of this data, nor transparency mechanisms to monitor how information collected through G-325R would be stored, shared, or safeguarded. The commenter stated that the potential for misuse would raise serious civil liberties concerns, particularly in the context of jurisdictions showing hostility toward immigrant populations.⁸⁵

Response: USCIS takes data protection seriously and uses, safeguards, and shares information entrusted to us by members of the public in accordance with stringent Federal standards, laws, policies, and procedures. USCIS needs the individual's biographic information to verify the identity of the requestor. USCIS uses the A-Number, name, alias, and birth date to determine if the individual is already in DHS systems and whether he or she has any relevant immigration history, or if the requestor is in removal proceedings. The address is used to determine the proper jurisdiction of the application or request and to mail notices, if applicable. The SSN may be used to verify the identity of the applicant or requestor.

USCIS leverages multiple Privacy Act SORNs to provide privacy coverage for G-325R data. Specifically, DHS/USCIS/ICE/CBP-001 Alien File, Index and National File Tracking System of Records, covers the physical and electronic immigration files, including A-Files and Receipt Files. DHS/USCIS-007 Benefits Information System, covers the collection, use, and storage of data elements USCIS collects about benefit requestors, beneficiaries, legal representatives, interpreters, and preparers. DHS/USCIS-018 Immigration Biometric and

⁸⁴ [Her Justice.](#)

⁸⁵ [Michigan State University College of Law Immigration Clinic.](#)

Background Check System of Records, covers background checks and vetting conducted on benefit requestors.

USCIS did not create a new system or procedures for processing Form G-325R data. USCIS uses its myUSCIS public web portal to process Form G-325R. myUSCIS is the conduit used to populate additional source systems associated with the particular benefit requested. These systems operate within the scope of Federal information management and security guidelines and procedures, such as the Federal Information Security Modernization Act (FISMA).⁸⁶ Information regarding myUSCIS and its protections can be found at <https://www.dhs.gov/publication/dhsuscispia-064-myuscis>. In the normal course, USCIS does not place comprehensive information pertaining to individual IT systems and its protections in its rulemaking documentation unless the rule pertains to a specific system or technology. DHS notes that the information collected by USCIS through Form G-325R is stored in ELIS, and that USCIS' partners at CBP and ICE have long had read-only access to USCIS systems, including but not limited to ELIS.

Comment: A commenter remarked that, when considered in full, Form G-325R appears less like a registration tool and more like an enforcement mechanism designed to elicit potentially incriminating information “under color of bureaucratic compliance.” The commenter additionally said that its implementation through an IFR, without adequate justification or procedural safeguards, represents a substantial. The commenter further stated that the form does not reflect the careful balance required between the government’s interest in collecting

⁸⁶ This is a United States Federal law that outlines a framework for protecting government information, operations, and assets against both natural and man-made threats. It requires Federal agencies to develop and implement information security programs, adhering to guidelines set by the FISMA was originally part of the E-Government Act of 2002 and has been further amended by the Federal Information Security Modernization Act of 2014.

information and the individual's right to due process and privacy. The commenter urged DHS to rescind Form G-325R and withdraw the IFR in its entirety.⁸⁷

A commenter wrote that the IFR conflicts with the PRA by requiring information that is superfluous or exceeds the scope of information specified for collection in 8 U.S.C. 1304(a).⁸⁸ Commenters wrote that the biographical and family information requested in the form, including the applicant's father or mother's name, date of birth, country of birth, and their city or town of residence, is intrusive. The commenters said that it is unclear how this information could be relevant to individual registration and added that the only conceivable reason for requesting this information is to look for illegal aliens in the United States. The commenters remarked that this request is invasive, violates fundamental privacy rights, and is not narrowly tailored to achieve a legitimate purpose for the information requested, and stated that it is also unclear whether such information can be left blank without suffering adverse consequences.⁸⁹

Response: DHS notes that section 264(a) of the INA, 8 U.S.C. 1304(a) requires forms for registration to inquiry on the alien's: date and place of entry of the alien into the United States; activities in which the alien has been and intends to be engaged; length of time he expects to remain in the United States; and police and criminal record, if any. The statute permits DHS to inquire into additional matters as may be prescribed. *See* section 264(a)(5) of the INA, 8 U.S.C. 1304(a)(5).

Comment: A commenter expressed concerns that unchecked biometric enforcement could undermine individual privacy and dignity. The commenter urged DHS to clearly outline data

⁸⁷ [Center for Human Rights and Constitutional Law.](#)

⁸⁸ [The American Immigration Lawyers Association.](#)

⁸⁹ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

protection measures, including retention periods, sharing limitations, cybersecurity protocols, and mechanisms for individuals to challenge errors or misuse, adding that increased transparency in these areas would help build public trust and ensure adherence to Federal privacy standards and best practices for data protection.⁹⁰

Another commenter said that DHS did not address how biometric data would be protected against breaches, whether it would be shared with local law enforcement, or what options exist for removal if an individual later adjusts status or departs the United States.⁹¹

Response: DHS notes that the statute established by Congress requires aliens applying for registration to be fingerprinted, if required. If an alien is required to provide biometrics after applying for registration, USCIS will schedule the alien for a biometric service appointment. Similar to other applications and petitions that require the collection of biometrics by USCIS, the agency has a professional and legal responsibility to safeguard information collected, disseminated, used, or maintained. DHS notes that DHS agencies may collect and store for present or future use, by electronic or other means, biometric information submitted by an individual. DHS may use this information to conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws. DHS notes that the information collected through Form G-325R is stored in ELIS, and that our partners at CBP and ICE have long had read-only access to USCIS systems, including but not limited to ELIS.

This rule also does not change procedures, practices or requirements of DHS agencies to protect against the unauthorized disclosure of personally identifiable information that it collects, disseminates, uses, or maintains in accordance with the Privacy Act of 1974. See DHS Privacy

⁹⁰ [USCIS-2025-0004-4258](#).

⁹¹ [USCIS-2025-0004-4228](#).

Notice and documents cited therein on Form G-325R Instructions and in applicable system of records notices (SORNs) at <https://www.dhs.gov/system-records-notices-sorns>.

e. Access Concerns for Registrants with Disabilities

Comment: A commenter asked how to “access the document to fill out.”⁹² A few commenters expressed concerns that the IFR fails to address accessibility within the collection process for people with disabilities, questioning whether the process violates the Rehabilitation Act.⁹³

Another commenter described the registration process as inaccessible, in part due to the long list of complex questions in Form G-325R.⁹⁴

Response: DHS and USCIS electronic and IT systems meet or exceed the requirements of section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended in 1998, and related guidance. DHS and USCIS are committed to making public information and data accessible and usable by individuals with disabilities in a manner that is comparable with individuals who do not have disabilities. This includes access to information on the alien registration requirement available on USCIS.gov and filing the electronic Form G-325R available through our myUSCIS platform. However, USCIS strongly disagrees with the commenter that section 508 would require content be materially modified for compliance and believes content modification runs counter to the intent and requirements of section 508, which seeks to provide comparable access, rather than separate access, to the same material by all individuals.

⁹² [USCIS-2025-0004-4210](#).

⁹³ [AFL-CIO; Hispanic Federation; National Immigrant Justice Center; Rocky Mountain Immigrant Advocacy Network](#).

⁹⁴ [Rocky Mountain Immigrant Advocacy Network](#).

f. Textual Questions and Recommendations Regarding Form G-325R

Comment: A commenter expressed concern that field No. 1.13(a) asks for the registrant's I-94 Arrival/Departure Record Number but the instructions also indicate that immigrants that were admitted and issued Form I-94 are exempt from the registration requirement, even after the period of admission has expired. Based on this analysis it is both conflicting and internally confusing to collect this information.⁹⁵

Response: Based on 8 CFR 264.1(b), most aliens with a Form I-94, Arrival Departure Record, have complied with the registration requirement and thus, would not be required to re-register, unless the alien reached age 14 years old and is required to apply for re-registration and to be fingerprinted. DHS modified the instructions to add this clarification.

Comment: A different commenter, providing detailed remarks with questions about the form, requested that DHS describe a list of "Activities" (e.g., jobs held, schools attended, leisure activities, political activities, medical history, voting history) and asked what level of detail should be provided regarding these activities.⁹⁶

Response: For purposes of registration, Form G-325R asks the alien to provide what activities the alien has engaged in since entry, and what activities the alien intends to engage in between now and the alien's expected date of departure, in accordance with section 264(a) of the INA, 8 U.S.C. 1304(a). As such, the inquiry for activities is limited to the activities that the alien engages during the alien's stay in the United States. At this time, DHS is not making any modifications in response to this comment.

⁹⁵ [USCIS-2025-0004-4053](#).

⁹⁶ [USCIS-2025-0004-0010](#).

Comment: A commenter suggested that DHS ask what sources of support a registrant may have had (e.g., housing assistance, employment, education, medical care, assistance with utilities and other housing expenses, other forms of sponsorship, and the contact information of and relationship with the sponsor), to determine whether registrants are at risk of becoming a public charge or committing another immigration violation. The commenter also asked whether registrants would need to disclose aliases used during their stay, and whether tax filings would be relevant to validation. Further, the commenter recommended asking whether the registrant has a passport that was issued by their home country and requesting reference information needed to connect them with their embassies. The commenter reasoned that there is the potential for too many people registering to be processed in a timely fashion, and that a detailed history would help DHS in its prioritization efforts.⁹⁷

Response: In accordance with the statutory registration requirement, DHS or USCIS is not making an admissibility determination because the grounds of inadmissibility are not relevant to the alien registration requirement. Form G-325R already asks for other names used and as such, aliens should provide their aliases. If the alien would like to provide any other information, such as tax information, the alien may do so in the space provided on the form or by uploading evidence or documents. In response to the other suggestions, USCIS modified the Form G-325R to collect information on an alien's passport.

Comment: In addition to the previous remarks, the same commenter also asked whether registrants could add attachments, such as other forms and affidavits of support for an application of a stay, to ease USCIS' review by the appointment time. The commenter

⁹⁷ [USCIS-2025-0004-0010](#).

additionally suggested that “everything that would happen procedurally when someone crosses the border illegally and apprehended should be included in the application” and given at the biometrics appointment.⁹⁸

Response: The current online Form G-325R already allows registrants to upload relevant evidence and documents in the form of attachments. Pursuant to the PRA and its implementing regulations, the information collected must be necessary for the proper performance of the functions of the agency, including information that has practical utility and information that is not otherwise reasonably accessible to the agency. *See* 44 U.S.C. 3506; 5 CFR 1320.5 and 1320.9. USCIS, as part of the Form G-325R, captures necessary information required to implement the registration requirement at this time, including the data element required in section 264 of the INA, 8 U.S.C. 1304. DHS is already asking for information about the alien’s last entry and, at this time, believes it has the information necessary to perform the agency function of registering aliens. USCIS did include additional evidence to collect for identity verification purposes.

Comment: Another commenter wrote that it is important that the new Form G-325R be made as user-friendly and accessible as possible, citing research showing that efficient, streamlined biometric procedures are critical to achieving enforcement goals without sacrificing fairness. The commenter added that offering online submission options, providing multilingual support, accessible formats for those with disabilities, and delivering clear, concise instructions would significantly improve accessibility and compliance rates.⁹⁹

⁹⁸ [USCIS-2025-0004-0010](#).

⁹⁹ [USCIS-2025-0004-4258](#).

Response: With this IFR and final rule, as always, DHS strives to be fair and efficiently execute the laws established by Congress. DHS notes that no immigration form is offered in any language other than English. Regarding multilingual support, an alien may use the assistance of an interpreter for reading the instructions and questions on the new registration form. If the alien uses an interpreter, he or she must provide the contact information of that interpreter and upload the interpreter's certification and signature when applying for registration.

DHS and USCIS are committed to making electronic and information technologies accessible to individuals with disabilities by meeting or exceeding the requirements of section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended in 1998. The myUSCIS site and its technology are designed to ensure individuals with disabilities can access and use information and data in a way that is comparable to those without disabilities.

Regarding online submission options, the Form G-325R will continue to be available for online submission through our myUSCIS platform. In addition to the rulemaking actions to publicize information on the alien registration requirement, USCIS established a dedicated website with information on the ARR and an ARR Tool that may help aliens determine whether they must register. DHS appreciates the commenters' feedback. DHS revised the instructional content to provide clarity on the form, including who should and should not submit the Form G-325R registration. In addition, for additional information about the registration requirements in the statute, including the legal background, USCIS included guidance on the public USCIS website on the "Alien Registration Requirement" web page (<https://www.uscis.gov/alienregistration>) for more information on registration.

Comment: A commenter recommended that the Form G-325R require the submission of photo ID and passport information or birth documentation as forms of evidence in order to mitigate the reporting of unverifiable or false information. The commenter said that the Form G-325R should clearly articulate that aliens should be present in the United States when filing the form to not give the false impression that those overseas can file the form. The commenter finally recommended that the Form G-325R should include additional questions relating to familial associations like former spouses, tax identifier numbers, and SSNs. The commenter said that this would make the Form G-325R similar to other USCIS forms like the G-325A, resolving the issue of multiple aliens who file the form who share the same name and date of birth and may not submit fingerprints. The commenter said that incorporating their recommendations would make registrations more in line with E.O.s while establishing an adequate registration system.¹⁰⁰

Response: DHS modified the G-325R to include the information suggested by the commenter, which includes a question asking for an alien's SSN, if any.

g. Online Submission (e.g., online only/lack of a paper process/internet accessibility automation)

Concerns Regarding Technological Access and Lack of Paper Alternative

Comment: Many commenters expressed concern that the requirement to complete the G-325R form exclusively online would present burdens for immigrants, including those with limited technological access or literacy.¹⁰¹ Citing research, another commenter remarked that the digital

¹⁰⁰ [USCIS-2025-0004-4267](#).

¹⁰¹ [USCIS-2025-0004-0006](#); [USCIS-2025-0004-0103 \[Form Letter Master\]](#); [USCIS-2025-0004-0197](#); [Chicago Education Advocacy Cooperative](#); [USCIS-2025-0004-0173](#); [USCIS-2025-0004-0259](#); [USCIS-2025-0004-0384](#); [USCIS-2025-0004-0388](#); [USCIS-2025-0004-0391](#); [USCIS-2025-0004-0392](#); [USCIS-2025-0004-0385](#); [USCIS-2025-0004-0389](#); [Central American Refugee Center \(CARECEN-NY\)](#); [National Immigration Law Center](#); [Division of Immigrant and Refugee Services](#), [Catholic Charities NY](#); [DePaul Asylum and Immigration Law Clinic](#); [USCIS-2025-0004-4105](#).

divide is particularly pronounced among immigrants, with one commenter citing research finding that in 2016, “77 percent of U.S. Hispanics who did not access the internet were immigrants.”¹⁰²

A commenter stated that some immigrants may only have access to the internet through mobile phones, which makes completing lengthy online forms with detailed responses particularly challenging.¹⁰³ A commenter wrote that many immigrants face multiple challenges, such as having limited access to reliable internet services, that make the registration process difficult.¹⁰⁴

Another commenter described the online-only registration process as a “substantial” barrier to compliance with the registration requirement.¹⁰⁵ Furthermore, another commenter wrote that many individuals lack access to reliable internet, official documentation, or proximity to ASCs, which they said could create widespread noncompliance with the new biometric process in the IFR—not due to defiance, but due to technical and resource barriers.¹⁰⁶

Similarly, one commenter wrote that ASCs are typically only available in major metropolitan areas, while the registration form used in 1940 was available in paper form at every post office in the United States.¹⁰⁷ A commenter described the NSEERS program and issues with implementation due to technical difficulties with online access at ports of entry.¹⁰⁸ One of the commenters critiqued the lack of new funding or community-based implementation to support the needed technological resources to improve access.¹⁰⁹

A commenter observed that all USCIS filings other than the G-325R, including the AR-11 address change form, are available by paper or online submission and that the lack of a paper

¹⁰² [DePaul Asylum and Immigration Law Clinic.](#)

¹⁰³ [The American Immigration Lawyers Association and The American Immigration Council.](#)

¹⁰⁴ [World Relief Corporation of National Association of Evangelicals.](#)

¹⁰⁵ [USCIS-2025-0004-0384.](#)

¹⁰⁶ [USCIS-2025-0004-4228.](#)

¹⁰⁷ [USCIS-2025-0004-3288.](#)

¹⁰⁸ [Chicago Education Advocacy Cooperative.](#)

¹⁰⁹ [Chicago Education Advocacy Cooperative.](#)

version of Form G-325A, a different USCIS form, is particularly difficult for “noncitizens” without access to computers.¹¹⁰ A commenter suggested that the Department should instead allow, as it does with other USCIS filings, options to submit the form online or by paper mail.¹¹¹

Another commenter wrote that requiring online filing would effectively penalize low-income and rural foreign nationals with limited access to computers and the internet, urging DHS to find a more effective and fair mechanism through the notice-and-comment process.¹¹²

The same commenter wrote that the online submission process was onerous and inaccessible, which would be compounded by the inability to receive proper legal representation during the process.¹¹³ A commenter recommended that DHS correct this omission.¹¹⁴

Several commenters specifically discussed the impact of the online submission requirement on vulnerable populations.¹¹⁵ A commenter remarked that the online-only requirement disproportionately affects elderly immigrants, those with limited formal education, and residents of rural areas,¹¹⁶ while another commenter stated the mandate to use only an electronic form of registration disproportionately targets registrants with limited resources.¹¹⁷ Another commenter described registrants who would need to arrange childcare or miss work or school to travel to access online resources.¹¹⁸ Another commenter stated that requiring immigrants to either use an online technology or face potential imprisonment “raises the specter of jailing people based on their poverty or education level.”¹¹⁹ Another commenter stated that the

¹¹⁰ [The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\).](#)

¹¹¹ [The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\).](#)

¹¹² [The American Immigration Lawyers Association and The American Immigration Council.](#)

¹¹³ [The American Immigration Lawyers Association and The American Immigration Council.](#)

¹¹⁴ [AFL-CIO.](#)

¹¹⁵ [National Immigration Law Center; National Immigration Project; USCIS-2025-0004-0103 \[Form Letter Master\]; Division of Immigrant and Refugee Services, Catholic Charities NY; USCIS-2025-0004-4053.](#)

¹¹⁶ [National Immigration Law Center; USCIS-2025-0004-4123.](#)

¹¹⁷ [USCIS-2025-0004-4053.](#)

¹¹⁸ [USCIS-2025-0004-0103 \[Form Letter Master\].](#)

¹¹⁹ [National Immigration Project.](#)

lack of availability offline violates due process protections for immigrants without access to digital communication technology.¹²⁰

Response: USCIS has considered providing a paper-based version; however, electronic processing of the registration information collection is extremely beneficial for registrants and USCIS. First, in the electronic requirement, and unlike in the paper environment, information submitted through the electronic process is easily readable and the registrant is prompted to provide the necessary information ensuring that the registration is complete. In the paper environment, a registrant may omit mandatory information, which would require USCIS to follow up with individuals. Additionally, for requests submitted online, the case processing occurs digitally. USCIS' electronic systems automatically receive the online form and any uploaded supporting evidence that proceeds electronically through each step of the registration process. This allows aliens to obtain evidence of registration almost instantly after applying for registration or after providing biometrics, if required, including in digital format, which is of significance in light of the requirement in section 264(e) of the INA, 8 U.S.C. 1304(e), for aliens to carry evidence of registration. Paper forms require manual intake processing at a facility, including opening the envelopes of a mailed submission, checking forms against acceptance criteria, and scanning the documents to convert them into electronic format or otherwise entering form responses into USCIS systems. Storing and moving costs render the process more costly. Manual intake processes are prone to mistakes, are more time-consuming and burdensome for the agency and the alien, and may lead to delays in processing and data integrity issues. Online access provides enhanced security, speed of data indigestion, identity management, and data integrity. E-processing has the potential to provide for the development of enhanced digital and

¹²⁰ [Division of Immigrant and Refugee Services, Catholic Charities NY.](#)

automated services, including fraud detection and national security analysis. Online-only processes thus have significant efficiencies over paper processes.

DHS is aware that certain populations may not have ready access to internet technologies. However, DHS believes that a significant number of aliens who are required to register have already been registered either through the visa process¹²¹ or through other encounters with the government.¹²² Additionally, as the use of technology has become increasingly widespread, DHS believes accessibility and internet usage as well as digital literacy has continuously increased over the years.¹²³ DHS believes that the affected population is able to comply with the online filing requirement.

For individuals who do not have a personal computer or a smart phone, there are many public facilities across the country, such as public libraries, that provide patrons with free on-line access to computers. Moreover, nearly all libraries assist patrons with using digital platforms and completing government forms. In fact, libraries are important public resources for internet access and digital literacy. In 2014, there were 9,070 public libraries in the United States.¹²⁴ The Digital Inclusion Survey 2014-2015 found that 98 percent of libraries in the United States at that time offered free Wi-Fi and technology training. Perhaps more significantly, it reported that nearly all libraries offered assistance in completing online government forms.¹²⁵ Therefore, DHS expects

¹²¹ See section 221(b) of the INA; 8 U.S.C. 1201(b).

¹²² See 8 CFR 264.1(a) and (b).

¹²³ For example, see Federal Communication Commission, "Internet Access Services: Status as of December 31, 2023," (Sept. 2024), <https://docs.fcc.gov/public/attachments/DOC-405488A1.pdf>.

¹²⁴ U.S. Department of Education, "Digest of Education Statistics: 2016," Ch. 7 (Feb. 2018), https://nces.ed.gov/programs/digest/d16/ch_7.asp. For 2020 figures, the number of libraries in the United States was reported at 9,025. See U.S. Department of Education, "Number of public libraries, number of books and serial volumes, and per capita usage of selected library services per year, by state or jurisdiction: Fiscal years 2019 and 2020," Digest of Education Statistics (June 2023), https://nces.ed.gov/programs/digest/d22/tables/dt22_701.60.asp.

¹²⁵ Kathy Rosa ed., American Library Association, "The States of America's Libraries 2015" at 10-11 (Apr. 2015), http://www.ala.org/news/sites/ala.org.news/files/content/0415_StateAmLib_0.pdf.

that those individuals who do not have personal access to the internet will be, at a minimum, able to create and access their USCIS online accounts at local libraries. Libraries also provide the advantage of knowledgeable librarians who can assist if filers are confused by any aspects of the technology.

DHS notes that USCIS ASCs are located throughout the United States with at least one center located in each State, as well as the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands.

Congress has supported and mandated the increased utilization of the internet and technology in government administration, and the delivery of a customized digital experience, such as through the Government Paperwork Elimination Act, Pub. L. 105-277 (Oct. 21, 1998), and the E-Government Act of 2002, Pub. L. 107-347 (Dec. 17, 2002), and the 21 Century Integrated Digital Experience Act, Pub. L. 115-336 (Dec. 20, 2018). In an effort to move to digitalization, DHS has, in 2011,¹²⁶ also updated regulations in various places, including 8 CFR 1.2 to incorporate submission in electronic format.¹²⁷ USCIS only accepts the electronic registrations for the H-1B selection lottery process¹²⁸ and online requests from sponsors who complete the Form I-134A, Online Request to be a Supporter and Declaration of Financial Support.¹²⁹ For over a decade, State has also required the online filing of nonimmigrant and immigrant visa applications, which constitutes the alien's registration for the purposes of section

¹²⁶ See 76 FR 53763 (Aug. 29, 2011).

¹²⁷ See 8 CFR 1.2, Benefit request (“Benefit request means any application, petition, motion, appeal, or other request relating to an immigration or naturalization benefit, whether such request is filed on a paper form or submitted in an electronic format, provided such request is submitted in a manner prescribed by DHS for such purpose.”).

¹²⁸ See 84 FR 888 (Jan. 31, 2019).

¹²⁹ See 88 FR 23451 (Apr. 17, 2023).

221(b) of the INA, 8 U.S.C. 1201(b) if duly executed.¹³⁰ State is also conducting the Diversity Visa Lottery on an online basis only.

For the reasons stated previously, DHS has determined that the governmental and public benefits outweigh any difficulties that a small segment of the affected public may encounter as a result of DHS not providing a paper version of the form. DHS believes that any potential difficulties individuals may experience with filing electronically can be overcome through the use of public services, as described previously. DHS notes that USCIS provides online and technical support for USCIS online accounts, including technical assistance with setting up an online account, problems logging into an online account, and difficulties uploading documents.¹³¹

Concerns Regarding Language Access

Comment: Multiple commenters voiced concern that immigrants would face compliance challenges using online registration due to language barriers.¹³² A commenter wrote that many immigrants face multiple challenges, such as having both language barriers, that make the registration process difficult.¹³³ Similarly, commenters stated that the limited language access and the online format of the registration process create multiple barriers to compliance for Limited English Proficiency populations, requiring service providers to offer additional translation support and technology assistance for which they may not have capacity.¹³⁴ One of the commenters wrote that due to unfamiliarity with the language or the technology, immigrants

¹³⁰ See 22 CFR 41.103(a)(1) amended by 73 FR 23067 (Apr. 29, 2008) and 42.63(a)(1) amended by 75 FR 45475 (Aug. 3, 2010).

¹³¹ See USCIS, "Online Account and Technical Support," <https://www.uscis.gov/tools/uscis-tools-and-resources/online-account-and-technical-support> (last updated Oct. 28, 2024).

¹³² [USCIS-2025-0004-0047](#); [USCIS-2025-0004-0103 \[Form Letter Master\]](#); [USCIS-2025-0004-0387](#); [World Relief Corporation of National Association of Evangelicals](#); [USCIS-2025-0004-4053](#); [Joint Comment Submitted by the Alliance for Immigrant Survivors](#); [USCIS-2025-0004-0387](#); [USCIS-2025-0004-0047](#).

¹³³ [World Relief Corporation of National Association of Evangelicals](#).

¹³⁴ [Joint Comment Submitted by the Alliance for Immigrant Survivors](#).

could accidentally enter false information into the system, risking self-incrimination.¹³⁵ Another commenter encouraged multilingual support and outreach programs to implement registration.¹³⁶ *Response:* DHS notes that no immigration form is offered in any language other than English.¹³⁷ All USCIS forms must be submitted in English. An alien may use the assistance of an interpreter for reading the instructions and questions on the new registration form. If the alien uses an interpreter, he or she must provide the contact information of that interpreter and upload the interpreter's certification and signature when applying for registration.

In addition to the rulemaking actions to publicize information on the alien registration requirement, USCIS established a dedicated website with information on the ARR and an ARR Tool that may help aliens determine whether they must register. See USCIS, DHS, "Alien Registration Requirement," <https://www.uscis.gov/alienregistration> (last updated May 6, 2025).

Concerns Regarding Accessibility for People with Disabilities

Comment: A couple of commenter remarked that clients with physical disabilities, including blindness or low vision, could find the online registration process difficult.¹³⁸ One commenter described how electronic devices with lighting shifts could trigger seizures for some individuals, potentially preventing them from using such applications.¹³⁹ Another commenter stated that individuals with certain physical or mental health disabilities, such as mobility or dexterity issues, Post-Traumatic Stress Disorder, or schizophrenia, may face significant barriers to accessing technology or completing a registration form.¹⁴⁰

¹³⁵ [USCIS-2025-0004-0387](#).

¹³⁶ [USCIS-2025-0004-0047](#).

¹³⁷ The only exception is Form I-9, Employment Eligibility Verification, which is also available in Spanish. See USCIS, Form I-9, "I-9, Employment Eligibility Verification," <https://www.uscis.gov/i-9> (last updated Apr. 2, 2025).

¹³⁸ [Florence Immigrant & Refugee Rights Project; Central American Resource Center of Northern California - CARECEN SF; USCIS-2025-0004-4053](#).

¹³⁹ [Michigan Immigrant Rights Center](#).

¹⁴⁰ [Rocky Mountain Immigrant Advocacy Network](#).

Commenters expressed concern that the process of information collection, including the required online submission, fails to address accessibility issues for people with disabilities, arguing that this lack violates sections 504 and 508 of the Rehabilitation Act.¹⁴¹

Response: DHS and USCIS are committed to making electronic and information technologies accessible to individuals with disabilities by meeting or exceeding the requirements of section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended in 1998. The myUSCIS site and its technology are designed to ensure individuals with disabilities can access and use information and data in a way that is comparable to those without disabilities.

It is the policy of DHS to ensure nondiscrimination based on disability in DHS-conducted programs and activities and for DHS component to provide equal opportunity for qualified individuals with disabilities, in accordance with section 504 of the Rehabilitation Act¹⁴² as well as implementing regulations and guidance.¹⁴³ Consistent with DHS's directive, USCIS provides reasonable disability accommodations for the public. See USCIS, "Disability Accommodations for the Public," <https://www.uscis.gov/about-us/disability-accommodations-for-the-public> (last updated Oct. 19, 2022).

Increased Burdens on Service Providers

Comment: A few commenters stated that the time required to assist clients with the online registration process would be significantly greater than with paper forms.¹⁴⁴ A commenter remarked that, as an example, employment authorization applications within the immigration system that could take around 30 to 40 minutes to prepare using paper forms can take several

¹⁴¹ [Immigration Center for Women and Children \[Form Letter Master\]; Acacia Center for Justice.](#)

¹⁴² See Pub. L. 93-112, 87 Stat. 355, 394 (Oct. 1, 1973).

¹⁴³ DHS implementing regulations can be found at in 6 CFR part 15. See also DHS, Directive Number 065-01, "Nondiscrimination for Individuals With Disabilities in DHS-Conducted Programs and Activities (Non-Employment)," (Sept. 25, 2013), https://www.dhs.gov/sites/default/files/publications/dhs-management-directive-disability-access_0_0.pdf.

¹⁴⁴ [Make the Road New Jersey; Journey's End Refugee Services.](#)

hours to prepare while navigating the online system.¹⁴⁵ A commenter similarly remarked that the online process creates significant logistical burdens, particularly for vulnerable populations who need additional assistance.¹⁴⁶

A couple of commenters stated that legal service providers are already overburdened and limited, especially in rural areas, which are those least likely to have public facilities available to access the internet and assistance.¹⁴⁷ A commenter stated that while other community organizations may step in to support immigration populations, the online process would further burden limited community and philanthropic resources that could otherwise be used to ensure individuals are able to apply for immigration status.¹⁴⁸ A commenter wrote that many organizations serving abuse survivors within the immigrant communities already operate with limited capacity, and the added workload of helping clients navigate the online-only process would divert resources away from crucial services.¹⁴⁹

Response: Overall, the average hour burden per response for completion of a form electronically is estimated to take less time than completion of a paper form due to the electronic submission providing a more streamlined process for the respondent to complete and submit the form and for USCIS intake and processing of the information collection. In response to the example used for applicants submitting the I-765 for employment authorization, the current average hour burden per response for this information collection is estimated at 4.38 hours to complete the paper form and 4 hours to complete the electronic version, indicating the reduced burden for completion of a form electronically which includes reviewing instructions, gathering required documentation and

¹⁴⁵ [Make the Road New Jersey.](#)

¹⁴⁶ [Journey's End Refugee Services.](#)

¹⁴⁷ [The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\); Valor US.](#)

¹⁴⁸ [The Advocates for Human Rights together with the Jewish Council for Public Affairs \(JCPA\).](#)

¹⁴⁹ [Valor US.](#)

information, completing the form, preparing statements, attaching necessary documentation, and submitting the form. Electronic submission and processing of the registration information collection is extremely beneficial for registrants and USCIS.

In the electronic environment, and unlike in the paper environment, information completed in the electronic process is easily readable and the registrant is prompted to provide the necessary information ensuring that the registration is complete. In the paper environment, a registrant may omit mandatory information, which would require USCIS to follow up with individuals. Additionally, online access provides greater security and safeguards. Online-only processes thus have significant efficiencies over paper processes.

Request to Streamline Online Process

Comment: Another commenter urged DHS to prioritize streamlining the online registration process to alleviate ongoing burdens by making the myUSCIS online registration system more user-friendly and efficient in order to reduce the time burden of completing the forms, not only alleviating the regulatory burden on the public but also improving compliance rates with the registration requirement.¹⁵⁰ A commenter requested that online submission options be available to ensure that registrants can successfully navigate the process without confusion or error.¹⁵¹

Response: DHS strives to streamline the online process by which unregistered aliens may register and comply with the law as required by the INA. In addition to the rulemaking actions to publicize information on the alien registration requirement, USCIS established a dedicated website with information on the ARR and an ARR Tool that may help aliens determine whether they must register.

¹⁵⁰ [USCIS-2025-0004-0024](#).

¹⁵¹ [USCIS-2025-0004-4258](#).

h. Burden Estimates and Affected Public

Comment: A commenter stated that the information collection would impose a burdensome process on respondents, reasoning that all respondents are not guaranteed access to electronic submission, the means to pay the \$30 fee, or the time to complete additional paperwork.¹⁵²

Several commenters expressed concern that the IFR would not accurately address the information collection burden that Form G-325R imposes on the public. The commenters remarked that DHS has underestimated the information burden for this form.¹⁵³ A commenter also wrote that the IFR would not account for the additional time burden for translating Form G-325R. The commenter concluded that limiting this form to English would impose a greater burden on indigenous Mayan “noncitizens” who speak languages such as Mam, K’iche, Q’eqchi, and Kanjobal, as they typically experience greater difficulty securing an interpreter.¹⁵⁴

Some commenters remarked that the requirement on Form G-325R to list all addresses from the past 5 years is excessively burdensome and goes beyond what is authorized under the INA. While raising concerns about the form’s undue burden on the public, the commenters said that this requirement disproportionately impacts individuals with unstable housing, frequent relocations, or military service, increasing the risk of unintentional errors that could be misinterpreted as fraud. The commenters expressed further concern that Form G-325R’s requests for extensive biographical and family information are overly burdensome.¹⁵⁵

A commenter expressed concern that the IFR would impose a substantial burden on the public, totaling 2.576 million hours annually. The commenter said that this time commitment

¹⁵² [USCIS-2025-0004-3414](#).

¹⁵³ [American Friends Service Committee \(AFSC\); Immigrant Justice Corps; Immigration Center for Women and Children \[Form Letter Master\]](#).

¹⁵⁴ [Immigrant Justice Corps](#).

¹⁵⁵ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors](#).

would place an “undue and egregious” strain on affected individuals, continuing what the commenter regarded as a trend of regulatory burdens imposed by USCIS. The commenter further stated that the time required to complete and file the registration form, travel to an ASC, and submit biometric information is untenable and could be mitigated through more efficient processes, including by leveraging technology to enhance the online registration system. The commenter urged DHS to address the cumulative regulatory burdens from USCIS and to make the registration process less burdensome.¹⁵⁶

Response: USCIS has increased the average hour burden per response for completion of Form G-325R from 0.67 hours to 2.5 hours to more accurately reflect the burden imposed on the public for this information collection. The burden associated with the completion of Biometric Services is also accounted for in this information collection of an average hour burden per response of 1.17 hours. Additionally, DHS strives to streamline the online process by which unregistered aliens may register and comply with the law as required by the INA.

i. PRA Emergency Authorization

Comment: A commenter expressed concern that DHS violates the PRA by prematurely releasing Form G-325R for online filing before publishing the required notice in the *Federal Register*. The commenter reasoned that the procedural failure denied the public a meaningful opportunity to comment on the form’s necessity and burden, rendering its continued use improper and unjustified.¹⁵⁷

¹⁵⁶ [USCIS-2025-0004-0024](#).

¹⁵⁷ [Center for Human Rights and Constitutional Law](#).

A couple of commenters critiqued DHS's use of the emergency exception to the notice-and-comment process.¹⁵⁸ One of the commenters expressed concern for the lack of public opportunity to provide input on the substance and design of Form G-325R or the policy implications of its use,¹⁵⁹ while commenters also expressed concern at the lack of opportunity for meaningful public review and called for DHS to rescind the form in its entirety.¹⁶⁰

Commenters stated that Form G-325R does not fall within the limited emergency exceptions to the notice-and-comment procedures, writing that no justification was given to support the claim of need for the emergency exception.¹⁶¹ While stating that the emergency exception requires a likely public harm, an unanticipated event, or a statutory deadline that would be missed, the commenter concluded that the requirements of emergency processing under 5 CFR 1320.13 were not met.¹⁶²

The commenters expressed disapproval that Form G-325R was made operational on the USCIS website in February before the posting of the IFR in March.¹⁶³ Referencing 6 CFR 1320.13, a commenter stated that the public was not provided with the required Federal Register notice.¹⁶⁴

The same commenter critiqued another rationale expressed in the IFR for avoiding notice-and-comment procedures, the rationale that the IFR does not alter the rights or interests of any party or encode a substantive value judgment on a given type of behavior. The commenter said that DHS has used inconsistent rationales to support avoiding notice-and-comment process

¹⁵⁸ [Presidents' Alliance on Higher Education and Immigration; Immigrant Legal Resource Center; Joint Comment Submitted by the Alliance for Immigrant Survivors.](#)

¹⁵⁹ [Presidents' Alliance on Higher Education and Immigration.](#)

¹⁶⁰ [Joint Comment Submitted by the Alliance for Immigrant Survivors.](#)

¹⁶¹ [Immigrant Legal Resource Center; Joint Comment Submitted by the Alliance for Immigrant Survivors.](#)

¹⁶² [Immigrant Legal Resource Center.](#)

¹⁶³ [Joint Comment Submitted by the Alliance for Immigrant Survivors; Immigrant Legal Resource Center.](#)

¹⁶⁴ [Immigrant Legal Resource Center.](#)

and this inconsistency cannot withstand the legal scrutiny of the PRA requirements and other Federal law.¹⁶⁵

The commenter also stated that forms approved under the emergency exception should only be temporary and expressed confusion about when the period of emergency temporary approval began, either February 25, 2025, which was the form's initial day of operation on the USCIS website, or when the IFR was published in March.¹⁶⁶

Response: USCIS submitted an emergency request and obtained emergency approval of Form G-325R in accordance with 5 CFR 1320.13 to comply with the statutory registration requirements and in compliance with E.O. 14519, Protecting the American People Against Invasion (Jan. 20, 2025), 90 FR 8443 (Jan. 29, 2025). *See* OIRA, Form G-325R, OMB Control Number 1615-0166, https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202502-1615-014 (last visited May 26, 2025). USCIS certified that the requirements of 5 CFR 1320.13(a) were met, including and that the new information collection was essential to the mission of the agency and the use of normal clearance procedures would result in public harm, prevent the collection of the information, and result in aliens missing a statutory requirement for registration. OMB provided emergency approval for the new collection of information on March 5, 2025, for a 5-month period to expire on August 31, 2025. In accordance with 5 CFR 1320.12, USCIS published a Federal Register notice at 90 FR 11793 for the Alien Registration Form and Evidence of Registration IFR, to include Form G-325R, on March 5, 2025. Comments on the information collection described in the Paperwork Reduction Act section of the IFR Federal Register notice were being accepted until May 12, 2025. This information collection is now going through normal PRA clearance procedures, as required by the OMB approval, which included the 60-day

¹⁶⁵ [Immigrant Legal Resource Center.](#)

¹⁶⁶ [Immigrant Legal Resource Center.](#)

public comment period publication in the *Federal Register* with the IFR, Alien Registration Form and Evidence of Registration, and a 30-day Federal Register notice to be published prior to the expiration date of this information collection.

On February 25, 2025, Secretary Kristi Noem announced that DHS would fully enforce the INA, including the Alien Registration provisions. *See* DHS, “Secretary Noem Announces Agency Will Enforce Laws That Penalize Aliens in the Country Illegally” (Feb. 25, 2025), <https://www.dhs.gov/news/2025/02/25/secretary-noem-announces-agency-will-enforce-laws-penalize-aliens-country-illegally>. The web page, among others, linked to the alien registration page. While unregistered aliens were able to submit the information, the Form G-325R was not fully operational and no registrations were processed until March 5, 2025, the day when OMB approved the form. On March 12, 2025, DHS published the IFR, prescribing the form as a registration form under 8 CFR 264.1. On April 11, 2025, with the effective date of the IFR, the Department started to enforce the statutory obligation of aliens. *See* DHS, Press Release, “Secretary Noem Reminds Foreign Nationals to Register Under Longstanding Federal Law or Face Legal Penalties” (Apr. 11, 2025), <https://www.dhs.gov/news/2025/04/11/secretary-noem-reminds-foreign-nationals-register-or-face-legal-penalties>.

Pursuant to the public protection provision of the PRA and implementing regulations, 44 U.S.C. 3512 and 5 CFR 1320.6(a), no person will be subject to any penalty for failing to comply with an information collection that is subject to the requirements of the PRA unless the collection of information displays a valid control number. However, the protections provided by 44 U.S.C. 3512 and 5 CFR 1320.6(a) does not preclude the imposition of a penalty on a person for failing to comply with a collection of information that is imposed on the person by statute. *See* 5 CFR 1320.6(e). The registration requirement of section 262 of the INA, 8 U.S.C. 1302, is a

legislative command. Thus, even if DHS had requested that aliens comply with the information collection before OMB approval of the Form G-325R, it would have been harmless. As it is, DHS did not commence the processing of the information collection before OMB approved the form on March 5, 2025. Additionally, it started the enforcement on April 11, 2025—well past 30 days after the approval of Form G-325R by OMB for aliens to comply with the statutory obligation to register.

Other/General PRA and Information Collection Instrument

Comment: A few commenters wrote that DHS confused the public by not providing individual notice for Form G-325R and instead including it in the IFR’s broader public comment period.¹⁶⁷ One of these commenters further stated that Form G-325R was posted online before the IFR was published and that no justification was provided for deviations from information collection procedures, warning that the public has been confused and expressing concern that Form G-325R would facilitate intimidation of respondents and the coercion of information that bears no relation to the form’s purported information collection.¹⁶⁸ Similarly, a commenter stated that the information collected on the G-325R would be used for enforcement purposes that compel “self-deportation” for “undocumented” individuals, thus denying benefits to eligible applicants.¹⁶⁹ Another commenter likewise expressed concern that the proposed information collection under OMB Control Number 1615 is not necessary for DHS to perform its functions. The commenter warned that the information collected could be weaponized and used illegally.¹⁷⁰ The

¹⁶⁷ [Immigrant Justice Corps; Immigration Center for Women and Children \[Form Letter Master\]; USCIS-2025-0004-0555.](#)

¹⁶⁸ [USCIS-2025-0004-0555.](#)

¹⁶⁹ [Immigrant Legal Resource Center.](#)

¹⁷⁰ [USCIS-2025-0004-3414.](#)

commenters said that, along with the IFR, the Form G-352R should be withdrawn, reasoning that it violates constitutional rights and the requirements of the APA and PRA.¹⁷¹

A commenter said that registrants should be able to review Form G-325R before registering.¹⁷²

Commenters stated that Form G-325R and the IFR would contravene the PRA's purpose by imposing an undue burden on organizations serving survivors, increasing their operational costs and administrative workload. The commenter also addressed DHS's statement that negotiation and approval by the OMB during PRA information collection reviews would mitigate the privacy risks associated with Form G-325R.¹⁷³

Response: DHS disagrees with the commenter that the procedure utilized as part of the Form G-325R OMB approval to implement the statutory requirement to register was confusing. USCIS made a request for and obtained emergency approval of the Form G-325R in accordance with 5 CFR 1320.13 to comply with the statutory registration requirements and in compliance with E.O. 14519, Protecting the American People Against Invasion (Jan. 20, 2025), 90 FR 8443 (Jan. 29, 2025). USCIS certified that the requirements of 5 CFR 1320.13(a) were met and that this collection of information was essential to the mission of the Department and the use of normal clearance procedures would result in public harm, prevent the collection of the information, and result in aliens missing a statutory requirement for registration. OMB provided emergency approval for the new collection of information on March 5, 2025, for a 5-month period to expire on August 31, 2025, along with a requirement to begin normal PRA clearance procedures within 45 days of the approval. See OIRA, OMB Control No. 1615-0166,

¹⁷¹ [The American Immigration Lawyers Association; Joint Comment Submitted by the Alliance for Immigration Survivors.](#)

¹⁷² [USCIS-2025-0004-0048.](#)

¹⁷³ [Joint Comment Submitted by the Alliance for Immigrant Survivors.](#)

https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202502-1615-014#section0_anchor (last visited May 26, 2025). In accordance with 5 CFR 1320.8(d)(1) and 5 CFR 1320.12, USCIS included a request for public comment within the Federal Register notice as part of the IFR published at 90 FR 11793 on March 12, 2025. Comments on the information collection described in the Paperwork Reduction Act section of the IFR Federal Register notice were accepted until May 12, 2025. USCIS will publish a 30-day Federal Register notice as required by 5 CFR 1320.12(c) requesting additional comment and USCIS will submit the entire package to OMB-OIRA for review and conclusion.

By providing Form G-325R, DHS provided an additional means for unregistered aliens to comply with the statutory requirement to register if the alien remains in the United States 30 days or longer. DHS faithfully executes the law and, thus, is implementing the law as provided by Congress. DHS disagrees with the commenters' characterization that DHS's action is not in accordance with the law.

Regarding the ability to review the Form G-325R before completing the registration, USCIS has provided a watermarked sample PDF version of the Form G-325R available on the USCIS website at www.uscis.gov/g-325r.

Concerns Regarding Systemic Access for People with Disabilities

Comment: A commenter expressed concern that the IFR and proposed information collections would not consider the registration process's impact on people with disabilities, nor how people with disabilities might access the registration process. The commenter wrote that this lack of consideration would violate section 504 of the Rehabilitation Act prohibiting disability-based discrimination and that DHS has an affirmative obligation under section 504 to ensure that the benefits, programs, and services it administers are accessible to people with disabilities,

including by providing reasonable modifications. The commenter reasoned that registration under the IFR is inaccessible in several ways and concluded that people with disabilities, therefore, do not have meaningful access.¹⁷⁴

Response: It is the policy of DHS to ensure nondiscrimination based on disability in DHS-conducted programs and activities, and for DHS components to provide equal opportunity for qualified individuals with disabilities, in accordance with section 504 of the Rehabilitation Act¹⁷⁵ as well as implementing regulations and guidance.¹⁷⁶ Consistent with DHS’s directive, USCIS provides reasonable disability accommodations for the public. *See* USCIS, “Disability Accommodations for the Public,” <https://www.uscis.gov/about-us/disability-accommodations-for-the-public> (last updated Oct. 19, 2022).

¹⁷⁴ [New York Office for New Americans.](#)

¹⁷⁵ *See* Pub. L 93-112, 87 Stat. 355, 394 (Oct. 1, 1973).

¹⁷⁶ DHS implementing regulations can be found at in 6 CFR part 15. *See also* DHS, Directive Number 065-01, “Nondiscrimination for Individuals With Disabilities in DHS-Conducted Programs and Activities (Non-Employment),” (Sept. 25, 2013), https://www.dhs.gov/sites/default/files/publications/dhs-management-directive-disability-access_0_0.pdf.