

Docket ID	Title	Comment	Attachment Files
USCIS-2025-0002	Comment Submitted by Theresa Lane	<p>I strongly oppose the addition of further information collection questions for the registration of foreign nationals for several reasons. To list a few, the existing immigration forms already contain extensive tracking and data collection mechanisms making additional questions repetitive and unwarranted. Ballooning these forms would not only place an undue burden on both the applicants and the administrative system but also risk making some of these forms impractically longer, further complicating and extending an already complex and overwhelming process. Moreover, history serves as a stark warning; the Holocaust began with registration of individuals a seemingly bureaucratic act that ultimately enabled systematic persecution. While our intentions today may be posed differently, increasing government data collection for foreign nationals could set dangerous precedents. We must remain on guard, always screening for, and acting against, policies that even inadvertently create pathways for discrimination, misuse of information, and/or the decay of civil liberties. Instead of expanding data collection, efforts should focus on ensuring that existing processes are well organized, fair, and protective of fundamental rights.</p>	
USCIS-2025-0002	Comment Submitted by Anonymous	<p>I urge against adding additional questions intended to collect information on immigration forms. First, and foremost, such forms already require that an individual disclose a plethora of information, and often are already repetitive. Beyond that, asking an individual to collect and provide more data further complicates an already complicated process, requiring applicants to provide more documentation and personal details, which is often difficult for those who have limited resources of access to certain records due to circumstances outside their control. Moreover, as the forms get long, the process of reviewing and processing such applications becomes more complex, burdensome, and one could even say, inefficient. Overall, in the interest of fairness, security, and efficiency, I think there should not be more information collected on immigration forms.</p> <p>The current revision seems wholly unnecessary. Take the draft version of Form N-400 (Application for Naturalization) for instance, several deficiencies have been identified that could potentially lead to confusion, processing delays, or unintended errors by applicants. As the naturalization process is a critical step for immigrants seeking U.S. citizenship, it is essential that the form be as clear, concise, and user-friendly as possible. Several sections of the form either lack clear instructions, require excessive or irrelevant information, or fail to provide applicants with appropriate guidance on how to proceed in specific situations. Below is a list of the some of the issues identified in the draft form:</p> <ol style="list-style-type: none"> 1. Lack of Instructions for Non-U.S. Citizen Parents - The form asks for information about the applicant's U.S. citizen father and mother but does not provide any guidance for those whose parents were not U.S. citizens. A clear instruction should be included, indicating that applicants should skip or mark "Not Applicable" if their parents were never U.S. citizens. 2. Ambiguous Language Regarding SSA Consent - Part 2, Item 13 requires applicants to authorize USCIS to share their information with the Social Security Administration (SSA) for issuing a Social Security Number (SSN). However, it does not clarify what happens if they refuse consent. A note should be included explaining whether this refusal impacts their application or ability to receive an SSN. 3. Missing Clarification on Biographic Information - The form requires the applicant to select their race and ethnicity but does not explicitly state if multiple selections are allowed or required. Some applicants may be of mixed racial backgrounds, so a clear instruction should be provided. 4. Confusing Wording in Selective Service Registration - The question about Selective Service registration (Part 11, Item 22) does not specify that only males are required to register. There should be an instruction stating something like: "This question is only applicable to males who were present in the U.S. between ages 18-26, excluding those in lawful nonimmigrant status." 5. Overly Broad Requirements for Sibling Information - The form requests detailed information about the applicant's siblings, including full names, addresses, and phone numbers for the past five years. It is unclear why this information is necessary for naturalization and may be an unnecessary burden for applicants. If required for a specific reason, an explanation should be provided. 6. There are sections that applicants may not need to complete (e.g., marital history for those who have never been married, or spousal information for those not applying under the 3-year provision). The form should include explicit instructions on when to skip sections, reducing unnecessary responses. It's pretty apparent that the marital history section was hastily removed from the current N-400 version because "Former Name" for spouse is required only for those I believe that the collection of information regarding social networks is unnecessary because a person can have more than one account in the different social networks that exist in society, also many people have more than one account because they have lost access to it and force them to create another, also I do not believe that the information contained in social networks is relevant to the award of an immigration benefit in the United States. <p>To Whom It May Concern:</p> <p>I am writing as an attorney with extensive experience representing clients in a wide range of immigration matters. I submit this comment in strong opposition to the proposed rule that would require applicants for certain immigration benefits (including Forms N-400, I-751, I-485, I-589, and others) to complete an additional form disclosing extensive biographical information, contact details, residence history, and other personal data about their family members.</p> <p>Legal Concerns</p> <p>The proposed rule raises serious legal concerns:</p> <p>Statutory Authority: The Immigration and Nationality Act (INA) does not explicitly authorize the collection of extensive data on family members who are not themselves applicants. The proposed form exceeds the statutory authority granted to USCIS.</p> <p>Administrative Procedure Act Violations: The proposed rule appears arbitrary and capricious under the Administrative Procedure Act, as the agency has not adequately justified the necessity of collecting 24 separate data elements about non-applicant family members.</p> <p>Privacy Act Concerns: The proposed collection raises significant Privacy Act issues by gathering sensitive information about individuals who have not consented to such disclosure and who are not themselves seeking immigration benefits.</p> <p>Fourth Amendment Implications: The sweeping nature of the information demanded may constitute an unreasonable search and seizure of information from non-applicants without proper constitutional safeguards.</p> <p>Practical Concerns</p> <p>Beyond the legal issues, this proposed form would have severe practical consequences:</p> <p>Chilling Effect on Applications: The requirement would deter eligible individuals from applying for immigration benefits for fear of exposing family members to potential enforcement actions or privacy violations. This will discourage lawful immigration and integration.</p>	https://downloads.regulations.gov/USCIS-0054/attachment_2.pdf , https://downloads.regulations.gov/USCIS-2025-0002-0054/attachment
USCIS-2025-0002	Comment Submitted by A New World Immigration Law		

The proposed expansion or data collection under the new immigration vetting standards is deeply flawed, posing significant risks to privacy, fairness, and efficiency. While the goal of enhancing national security is valid, the methods outlined in this proposal are excessive, intrusive, and likely to cause more harm than good. Below, I highlight the critical issues with this proposal:

1. **Unjustified Privacy Violations**: The requirement to collect 24 data elements, including sensitive information such as email addresses, phone numbers, and detailed family records, represents an unprecedented invasion of privacy. Demanding historical data spanning up to 10 years (e.g., email addresses and phone numbers) is particularly egregious, as it imposes an unreasonable burden on applicants and increases the risk of data misuse or breaches. This level of intrusion is disproportionate to the purported security benefits and could deter individuals from pursuing legitimate immigration benefits.

2. **Excessive Burden on Applicants**: The estimated time burden for completing these forms—ranging from 0.73 to 1.27 hours per respondent—grossly underestimates the complexity and difficulty of gathering such extensive information. For many applicants, especially those from marginalized or resource-limited backgrounds, this process will be prohibitively time-consuming and costly. The proposal fails to account for the practical challenges faced by individuals who may lack access to comprehensive records or the means to compile such detailed data.

3. **Risk of Discriminatory Practices**: The inclusion of family member information and other expansive data points creates a high risk of discriminatory practices. Applicants from certain regions or with specific familial ties may face undue scrutiny or bias, regardless of their individual circumstances. This undermines the fairness and integrity of the immigration system and could lead to unjust denials of benefits based on arbitrary or prejudiced assessments.

4. **Inadequate Data Security Measures**: The proposal provides insufficient detail on how the collected data will be stored, protected, and shared. Given the highly sensitive nature of the information, the lack of robust data security protocols is alarming. Without clear safeguards, the risk of data breaches, unauthorized access, or misuse is unacceptably high, potentially exposing applicants to identity theft, surveillance, or other harms.

5. **Lack of Evidence for Efficacy**: There is no evidence that the expanded data collection will meaningfully improve national security outcomes. Many of the proposed data elements, such as historical email addresses and phone numbers, are unlikely to provide actionable intelligence or significantly enhance the accuracy of vetting processes. This raises concerns that the proposal is more about expanding surveillance than addressing genuine security threats.

6. **Disproportionate Impact on Vulnerable Populations**: Refugees, asylum seekers, and other vulnerable groups will bear the brunt of these burdensome requirements. Many lack access to the necessary documentation or face significant challenges in providing historical information, which could delay or deny

The proposed information collection under Executive Order 14161 raises significant concerns regarding privacy, fairness, and efficiency. The collection of 24 data elements, including highly sensitive personal information such as email addresses, telephone numbers, and extensive family member details, represents a substantial intrusion into the privacy of individuals seeking immigration benefits. Requiring information spanning up to 10 years (e.g., email addresses and telephone numbers) imposes an undue burden on applicants and risks exposing sensitive personal data to potential misuse or breaches. This overreach is unlikely to provide meaningful security benefits while significantly increasing privacy risks.

The estimated time burden for completing these forms—ranging from 0.73 to 1.27 hours per respondent—fails to account for the complexity of gathering and verifying the extensive information required. For many applicants, particularly those from disadvantaged backgrounds or with limited access to records, this process could prove excessively time-consuming and costly. The broad scope of data collection, particularly the inclusion of family member information, raises concerns about the potential for discriminatory outcomes. Applicants from certain regions or with specific familial ties may face heightened scrutiny or bias, regardless of their individual circumstances, undermining the fairness and integrity of the immigration system.

The proposal provides insufficient detail on how the collected data will be stored, protected, and shared, raising significant concerns about data security. Given the sensitive nature of the information, the risk of data breaches or unauthorized access is substantial. The proposal does not provide evidence that the expanded data collection will meaningfully improve national security outcomes. Many of the proposed data elements, such as historical email addresses and telephone numbers, are unlikely to provide actionable intelligence or significantly enhance the accuracy of vetting processes.

The proposed requirements could disproportionately affect vulnerable populations, including refugees and asylum seekers, who may lack access to the necessary documentation or face challenges in providing historical information, potentially delaying or denying critical immigration benefits to individuals in need of protection. The proposal appears to have been developed without sufficient input from stakeholders, including immigrant advocacy groups, privacy experts, and the general public, undermining the legitimacy of the proposed measures and risking the oversight of important perspectives.

While the importance of safeguarding national security is recognized, the proposed information collection under E.O. 14161 is overly broad, intrusive, and potentially counterproductive. The measures risk undermining privacy, fairness, and efficiency while imposing significant burdens on applicants. USCIS should reconsider the scope of the proposed data collection, prioritize privacy and security, and adopt a more balanced approach that aligns with the values of fairness and inclusivity.

This proposed USCIS rule is an overreach that violates privacy and due process. Requiring applicants to provide phone numbers, emails, and whereabouts of family members forces disclosure of personal information from people who have not consented. It creates unnecessary government surveillance and could put relatives at risk. There are no clear safeguards to prevent misuse or data leaks. USCIS already has strict vetting processes, and this adds needless bureaucracy without improving security. This rule normalizes invasive data collection and further erodes individual rights.

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Olia Catala

USCIS-2025-0002 Comment Submitted by Jennifer Walker Gates

The collection of mountains of irrelevant information is the opposite of efficiency. Do not implement this proposal.

USCIS-2025-0002 Comment Submitted by Anonymous

This proposed USCIS rule is an overreach that infringes on privacy and due process. Requiring applicants to disclose phone numbers, emails, and the whereabouts of family members compels the sharing of personal information from individuals who have not consented. This policy invites unnecessary government surveillance and could put relatives at risk, particularly those in vulnerable situations. Moreover, there are no clear safeguards to prevent data misuse or leaks. USCIS already employs rigorous vetting procedures, making this additional requirement an unnecessary bureaucratic burden that does not enhance security. Normalizing such invasive data collection further erodes individual rights and sets a dangerous precedent.

USCIS-2025-0002 Comment Submitted by Isaac Medina

Hello, I am writing in opposition to these proposed regulations. The added questions will be burdensome to Respondents, practitioners and adjudicators. The proposed additional collection of information is not material to the eligibility of Respondents for said forms nor is the information material to the adjudication of said forms. Thus, there is no logical or reasonable purpose in the public interest and efficient administration of public governance to enact such proposed rule.

Respectfully, in light that the additional information is not material to the eligibility of respondents nor material in adjudicating the applications, I urge you to reconsider and retract this proposed new rule.

I practice in this area and I am writing to express my strong disapproval of the proposed revisions, specifically and especially to Form N-400, Application for Naturalization. The proposed changes nearly double the length of the form from 14 to 26 pages, requiring excessive and irrelevant personal information that has no bearing on naturalization eligibility under the Immigration and Nationality Act (INA). These proposed revisions also seemingly violate the Paperwork Reduction Act (PRA) by vastly increasing the burden on applicants while failing to justify why such intrusive information is necessary.

For example, the proposed form asks for parents' addresses and phone numbers for the past five years, even when they are not U.S. citizens or may be deceased. It also demands siblings' telephone numbers from the past five years and an applicant's email history for the past ten years—none of which have any relevance to naturalization requirements. This overreach is an unwarranted invasion of privacy and places an undue burden on applicants, many of whom may not have access to such information (e.g. an applicant who is estranged from their family or their siblings; or vice versa). The PRA mandates that agencies limit their data collection to only what is essential, and this expansion fails that standard entirely.

USCIS-2025-0002 Comment Submitted by Roberto Callahn

Beyond its unnecessary expansion, the revised form violates the Administrative Procedure Act (APA) by imposing new, unauthorized requirements that exceed the statutory scope of naturalization eligibility. The INA, and Congress exercising their exclusive jurisdiction over immigration, sets out clear criteria for naturalization: lawful permanent resident admission, continuous residence, physical presence, English proficiency, and good moral character. The draft form, however, introduces entirely new questions about an applicant's family members that have never been required before (either in the current form, or any previous iterations) and that USCIS has no legal basis to collect.

In addition to its legal and procedural overreach, the draft form contains numerous glaring errors that demonstrate a lack of proper review. For example, Part 7 (Item 5) now not being optional to only those applying under spousal/3-year provision, now assumes all applicants are married to U.S. citizens, making it mandatory for everyone to fill out, despite the fact that spousal eligibility only applies to a subset of applicants. Part 10, Item 4 asks for parent's "City/Town of Birth" but does not provide a box/field for applicants to enter that information. Part 10 also assumes that an applicant's parents are U.S. citizens, which is not a requirement for naturalization and was never part of prior versions of the form (only that if they're US Citizens, USCIS advised applicants not to file N400 and file N600 instead). There are also formatting mistakes and mislabeling of sections on Page 13, such as "Marital History (Continued)" being mis-numbered (Part 5 vs Part 7) and inconsistencies in item numbering (qualifier for (1.d) mentioning part 8 instead of what now is part 9). That such fundamental errors survived internal agency review and OIRA review is shocking and underscores the rushed, haphazard nature of this proposal. The reckless restructuring of the form disregards longstanding precedent and creates unnecessary confusion.

The proposed changes are legally unsound, procedurally unjustified, and filled with fundamental errors. DHS has failed to explain why this excessive data collection is necessary. This proposed USCIS rule is an intrusive overreach that undermines privacy and due process. Requiring applicants to submit contact details and locations of family members forces the disclosure of sensitive personal information without their consent. This excessive data collection raises concerns about unwarranted government surveillance and potential risks to those affected. With no clear protections against misuse or data breaches, the rule adds unnecessary bureaucracy without offering meaningful security improvements. Given USCIS's already stringent vetting procedures, expanding data collection in this manner is unwarranted and sets a concerning precedent for personal privacy rights.

USCIS-2025-0002 Comment Submitted by Matthew DiMarco

USCIS-2025-0002 Comment Submitted by David Hogset

This proposed USCIS rule is an overreaching and invasive measure that compromises privacy and due process. Mandating applicants to disclose contact details and locations of family members compels the release of sensitive personal information without their consent. Such an expansion of government oversight raises concerns about unwarranted surveillance and potential risks to affected families. Without clear safeguards against data misuse or breaches, this rule increases bureaucratic burdens without delivering significant security benefits. USCIS already enforces rigorous vetting procedures, making this additional data collection unnecessary and a troubling precedent for personal privacy rights.

USCIS-2025-0002 MM1 Comment Submitted by Joshua Sussex

This proposed USCIS rule is an excessive and intrusive measure that violates privacy and due process. Requiring applicants to provide contact information and locations of family members forces the disclosure of sensitive personal data from individuals who have not given consent. This kind of overreach invites unnecessary government surveillance and could expose families to unintended risks. With no clear protections against data misuse or leaks, this rule creates more bureaucracy without adding meaningful security benefits. USCIS already has stringent vetting procedures in place—expanding data collection in this way is unjustified and sets a dangerous precedent for personal privacy rights.

To Whom It May Concern:

I am writing as an attorney with extensive experience representing clients in a wide range of immigration matters. I submit this comment in strong opposition to the proposed rule that would require applicants for certain immigration benefits (including Forms N-400, I-751, I-485, I-589, and others) to complete an additional form disclosing extensive biographical information, contact details, residence history, and other personal data about their family members.

Legal Concerns

The proposed rule raises serious legal concerns:

Statutory Authority: The Immigration and Nationality Act (INA) does not explicitly authorize the collection of extensive data on family members who are not themselves applicants. The proposed form exceeds the statutory authority granted to USCIS.

Administrative Procedure Act Violations: The proposed rule appears arbitrary and capricious under the Administrative Procedure Act, as the agency has not adequately justified the necessity of collecting 24 separate data elements about non-applicant family members.

Privacy Act Concerns: The proposed collection raises significant Privacy Act issues by gathering sensitive information about individuals who have not consented to such disclosure and who are not themselves seeking immigration benefits.

Fourth Amendment Implications: The sweeping nature of the information demanded may constitute an unreasonable search and seizure of information from non-applicants without proper constitutional safeguards.

Practical Concerns

Beyond the legal issues, this proposed form would have severe practical consequences:

Chilling Effect on Applications: The requirement would deter eligible individuals from applying for immigration benefits for fear of exposing family members to potential enforcement actions or privacy violations. This will discourage lawful immigration and integration.

Family Separation Risks: Applicants with mixed-status families may be forced to choose between pursuing their own lawful status and protecting their family members, exacerbating family separation.

Administrative Burden: The proposed form would significantly increase the already substantial paperwork burden on applicants, leading to delays, errors, and increased processing times.

Disproportionate Impact on Vulnerable Populations: Refugees, asylees, and victims of trafficking or domestic violence may be particularly harmed by requirements to disclose information about family members who may remain in dangerous situations.

Unnecessary Duplication

The proposed form unnecessarily duplicates information already collected through other means:

Current immigration forms already collect essential information about immediate family members necessary for adjudication.

USCIS-2025-0002 Comment Submitted by Jean Paul Pascual

The newly requested information is repetitive and already provided for by the affected forms. The I-485, I-751, N-400, and I-589 already request this biographic information. For purposes of eliminating inefficiency and unnecessary bureaucracy, this new form should not be implemented.

Our office specializes in family-based petitions, we have seen firsthand the increasing burden that unnecessary USCIS procedural expansions place on applicants. This is not an isolated issueâ€”this is part of a broader pattern of excessive and unlawful government overreach across multiple new USCIS forms. Immigration procedures must remain within the legal framework set by Congress, not arbitrarily expanded by agency fiat. We express strong disapproval here.

Weâ€™ve analyzed the proposed expansion of Form I-751 to 26 pages. We find that as a blatant violation of the statutory limitations set by INA â 216, which strictly defines the scope of USCISâ€™s authority in adjudicating these petitions. Congress has made clear that the only issue at stake in a (joint) I-751 petition is the bona-fides of the marriage, without discretionâ€”yet USCIS is attempting to impose an intrusive and unauthorized investigatory process that extends far beyond what the law allows.

USCIS-2025-0002 Comment Submitted by Carolina Antonio

The demand for extensive personal dataâ€”including years of telephone numbers, employment history, and information about parents and siblingsâ€”is entirely irrelevant to the question of whether a marriage was entered in good faith. INA â 216 does not grant USCIS discretion to conduct broad audits, or familial inquiries under the guise of a jointly filed I-751 petition. By requiring such intrusive information from both the petitioner and the U.S. citizen spouse, USCIS is engaging in an improper fishing expedition that has no basis in the statute. In fact, USCIS already has most of this information on file from prior filings, making this entire exercise redundant and an unjustifiable waste of resources.

These changes must be rejected in their entirety. USCIS is not above the law, and the statute does not permit this kind of invasive, extrajudicial inquiry. The proposed revisions to Form I-751 must be withdrawn entirely to ensure compliance with federal law and to prevent unjustified government intrusion into applicants' personal lives.

USCIS-2025-0002 Comment Submitted by Anonymous

This is only going to cause more backlog and frustration. USCIS is not thinking about those of us who have spent thousands in our case just submitted n-400 in January people are on the road to doing it right and are being held up by changes. This in no way is helping anything

USCIS-2025-0002 Comment Submitted by Anonymous

This form serves no purpose other than to scare immigrants from pursuing lawful status, increase processing times and costs for federal agency and provides no benefit.

USCIS-2025-0002 Comment Submitted by Prokosch Law

This is nothing short of complete and total government overreach. There is no way to guarantee that the information will be safe. This is a threat to all Americans, with or without status and should be completely revoked.

Our office submits this comment with a strong disapproval of these revised forms, including and not limited to N-400. The recent proposed revision of, especially, Form N-400 reveals substantial deficiencies that could adversely impact the efficiency, clarity, and fairness of the naturalization process.

One particularly troubling revision relates to the sections requesting detailed parental information. The updated draft expands the scope significantly, requiring applicants to provide comprehensive personal information about both parents, including detailed histories of residences and phone numbersâ€”even for parents who have passed away. This requirement represents a puzzling extension of USCISâ€™s prior expectations, and nowhere does the form offer guidance about the justification or rationale behind requesting such extensive historical data. For example, compelling applicants to report five-year telephone usage history and precise addresses for deceased parents is both unrealistic and unnecessarily intrusive. Applicants, particularly those whose parents died decades earlier or in distant countries, might find themselves undertaking onerous searches for obscure historical records that have no clear relevance to their current eligibility for naturalization. Moreover, the form notably lacks clear instructions regarding how applicants should address the information requests about parents who never held U.S. citizenship. It explicitly asks applicants to detail if a parent was a U.S. citizen prior to the applicantâ€”s 18th birthday but provides no directive as to what steps should be followed if the answer is negative or if parents never held U.S. citizenship status.

USCIS-2025-0002 Comment Submitted by Ryan Immigration Associates

An especially alarming expansion of requirements pertains to sibling and child information requested. Applicants are now instructed to provide exhaustive information concerning their siblings and children, including telephone numbers, dates of birth, and even historical addresses. The draft form fails utterly to justify why such meticulous and deeply personal data about relativesâ€”particularly adult siblings and adult childrenâ€”is relevant to naturalization proceedings. The invasive nature of such demands, compounded by the sheer volume of detailed historical data requested, significantly exceeds prior editions of Form N-400. Notably, the form offers no distinction between applicants whose eligibility is straightforward (e.g. General Provision) and those whose family ties directly affect eligibility (Spouse of USC Employed Abroad). This issue also extends into marital history reporting in Part 7, where the revised form irrationally expands requirements to include unnecessary data for all applicants regardless of naturalization eligibility (e.g. those applying under General 5-year Provision). Even applicants who have never married or whose marital history has no bearing whatsoever on their eligibility (such as those applying under the standard five-year provision, not the three-year marriage provision) must now report detailed employment history of spouses.

USCIS-2025-0002 Comment Submitted by Monica Nevin

The expansive data collection about applicants' siblings and childrenâ€”extending even to deceased relativesâ€”appears fundamentally disproportionate and disconnected from USCISâ€™s stated regulatory mission of assessing eligibility for naturalization. While it is understandable that some family information may be necessary for certain discretionary immigration benefits, naturalization itself is not discretionary but a right to eligible lawful permanent residents who satisfy statutory requirements. The invasive and exhaustive familial data collection included in this draft seems to cross from legitimate regulatory inquiry into an intrusive audit significantly raising privacy concerns and exposing the agency to increased litigation risk on privacy and due process grounds. Given this is unnecessary and rather than this information being used to protect or keep the US safe, it will be used to target immigrants and intimidate anyone associated with trying to navigate the US immigration system and laws.

USCIS-2025-0002 Comment Submitted by Lailah Haghsheno-Sabet

Proposing that immigration applicants should be required to provide highly detailed disclosure of sensitive information regarding their parents, siblings, children, and spouse, is being done to help discourage people from applying for immigration status by threatening their relatives. This undermines the purpose of immigration which is the base of how our country was founded. We need to stay integris to what the purpose of what immigration is supposed to provide both for the receiving country and those looking to immigrate. Our country's success has always been founded on the actions and successes of both immigrants and their descendants. I want our country to continue to succeed and thrive and it will not do so by closing off to everyone except a select few.

USCIS-2025-0002 Comment Submitted by Maximus Valterius

Most people wonâ€™t be able to get the requested information, not everyone will have access to emails and phone number histories for the requested extent from the requested parties (ie siblings, parents). I myself am estranged from my family, I will not be able to provide this information. This an absurd request, US citizens deserve better. My rights to happiness and fairness are not up for debate. Do better USCIS.

USCIS-2025-0002 Comment Submitted by FF

What if we are estranged from family members? These applications are about the individual. I support this regulation, with modifications. Here is the data that would be relevant for fiancÃ© and spousal visa applicants:

- Name
- Aliases
- Date of Birth
- City, State/Province and Country of Birth
- Countries of Citizenship
- Country of residence
- Passport Number, Passport Country of Issuance, Passport Issue Date, Passport Expiry Date
- Personal phone numbers used in the last 5 years
- Emails used in the last 5 years
- US Address
- Foreign Address
- US Point of Contact Name, Phone Number, and Email (if the applicant is outside of the US)
- Family Members Name (Parent, Spouse, Sibling, and Child)
- Family Members Date of Birth (Parent, Spouse, Sibling, and Child)
- Family Members Place of Birth (Parent, Spouse, Sibling, and Child)
- Family Member Residence (Parent, Spouse, Sibling, and Child)

Pertinent Information, with modifications:

- Family Member Telephone Numbers (parent, spouse, siblings, and children) used from the last five (5) years

Only current phone numbers are pertinent and can be obtained by the applicant. Anything else would be too cumbersome and irrelevant.

Irrelevant Information:

- Business Telephone Number(s) from the last five (5) years
- Business Email Address(es) from the last ten (10) years

Of the 24 data elements to be collected, #1 through #8 are reasonable, as well as #11 through #17.

Issues #9 and #23 are unreasonable, as phone numbers are not suitable for identification in the same way that passports and other state-issued documents can be. Telephone numbers are oftentimes "public" information (published online by public data brokers), and this could allow any malicious actor to register for any service using a victim's telephone number. This sort of attack could be used to "frame" someone and make them appear to have interests they do not possess.

Issues #10 and #24, which pertain to collection of information related to e-mail addresses, are also unsatisfactory, but unlike #9 and #23, they do not even call for dates that the e-mail address was used. First and foremost, anybody can register to things such as politically-sensitive newsletters using anybody's e-mail address. Moreover, e-mail addresses from major providers such as Microsoft and Yahoo are often deactivated after short periods of inactivity, much less than 10 years, and more importantly, the addresses can be recycled and distributed to new applicants. Thus, for example, "john Doe@email.com" could be an e-mail address used by many different people over the years. Subscriptions to newsletters and other services made under any individual's account ownership do not magically disappear once the account is deactivated. The new owner of the address could continue to receive the newsletters and other things related to the previous owner's activity. In this sense, it is no different to "snail mail". Thus, e-mail is not a good method of determining the activities and interests of the account's owner.

Issues #18 through #22, in relation to the individual's family members, have no business being investigated by this program. Every individual ought to be investigated for their own merit alone. It may come to pass that the individual has family members that are persons of interest, but that should have no bearing on whether the individual is admitted access to these services. It may also come to pass that the individual is a person of interest, which may negatively affect innocent, unrelated, and/or estranged family members from receiving access to these services.

I find it nothing short of ridiculous that this proposal mentions that it will take over 2.7 million work-hours annually to operate such a program, and yet it will cost zero dollars. I cannot imagine a bigger waste of time than meticulously investigating all available logs (likely purchased from the private surveillance companies which the government is known to deal with) related to phone number & e-mail activity for not just the applicant, but also those belonging to all of their family members, and even people who have previously used those phone numbers and e-mail addresses. For such a feat to be achieved, at a cost of zero dollars, would surely indicate budget cuts in other operations by USCIS.

USCIS-2025-0002 Comment Submitted by Anonymous

I do not support these changes due to privacy concerns and additional burden on government which would add to the backlog in proceeding/adjudicating these applications.

To Whom It May Concern:

I am writing as a concerned birthright citizen who has family members who are naturalized citizens. I submit this comment in strong opposition to the proposed rule that would require applicants for certain immigration benefits (including Forms N-400, I-751, I-485, I-589, and others) to complete an additional form disclosing extensive biographical information, contact details, residence history, and other personal data about their family members.

Legal Concerns

The proposed rule raises serious legal concerns:

Statutory Authority: The Immigration and Nationality Act (INA) does not explicitly authorize the collection of extensive data on family members who are not themselves applicants. The proposed form exceeds the statutory authority granted to USCIS.

Administrative Procedure Act Violations: The proposed rule appears arbitrary and capricious under the Administrative Procedure Act, as the agency has not adequately justified the necessity of collecting 24 separate data elements about non-applicant family members.

Privacy Act Concerns: The proposed collection raises significant Privacy Act issues by gathering sensitive information about individuals who have not consented to such disclosure and who are not themselves seeking immigration benefits.

Fourth Amendment Implications: The sweeping nature of the information demanded may constitute an unreasonable search and seizure of information from non-applicants without proper constitutional safeguards.

Practical Concerns

Beyond the legal issues, this proposed form would have severe practical consequences:

Chilling Effect on Applications: The requirement would deter eligible individuals from applying for immigration benefits for fear of revealing family members to potential

I wholeheartedly believe that this proposed rule change is in violation of the PRA, INA, and by extension the APA.

PRA violations: This asks for a large amount of additional information that is not necessary for carrying out the duty to duly vet applicants. This requires submission of personal private information of non-applicants who's only connection is that they are a relative to the applicant. The address and contact history of non-applicants is of no bearing on USCIS' ability to vet applicants themselves. It raised burden of the process, makes filing review significantly less efficient, and violates the privacy of non-applicants without benefit.

USCIS-2025-0002 Comment Submitted by Elizabeth Sabet

INA & APA: the application classifications overseen by USCIS are enshrined in law through the INA. USCIS has a degree of latitude, however, USCIS' ability to alter the process is bounded by the Administrative Procedures Act. In short, USCIS is outside of its authority to alter the process in ways that aren't logical outgrowths of statute. In particular, I want to draw attention to the clear line of personal information of the applicant vs information on non-applicants. Nowhere in the INA are blanket requirements for contact and location history about others who are simply related to the applicant other than in specific cases where this information is clearly relevant to the application being sought. Clearly it is not pulling on a thread in statute. It is a whole cloth invention. Under the framework of the APA, such regulatory propositions are in violation of logical outgrowth. Quoting from the majority in *Kooritzky v. Reich* "Something is not a logical outgrowth of nothing."

USCIS-2025-0002 Comment Submitted by Anonymous

I generally support the modification, with some caveats. I am a fiance visa applicant and am writing my comment from that perspective.

This is the information that is relevant and that should be as the Notice specifies:

1. Name
2. Alias(es)
3. Sex
4. Date of Birth
5. City/State/Province and Country of Birth
6. Country/Countries of Citizenship
7. Country of Residence

8. Passport/Travel Document
1. Country of issuance
2. Issue date
3. Expiration date

11. U.S. Address: Residence or Destination, city, street
12. U.S. Address: Residence or Destination, state/province
13. Foreign Address city, street
14. Foreign Address state/province
15. U.S. Point of Contact Name, if applicant is located outside of the United States
16. U.S. Point of Contact Telephone Number, if applicant is located outside of the United States
17. U.S. Point of Contact Email, if applicant is located outside of the United States
18. Family Member Names (parent, spouse, siblings, and children)
20. Family Member Date(s) of Birth
21. Family Member Place(s) of Birth
22. Family Member Residence(s)

USCIS-2025-0002 Comment Submitted by Vicky Rodgers

Items 18-22 specifically create an undue burden on individuals and collects data that has no bearing on most petitions and forms of relief, unless it is the data on the petitioner, which is already collected. Additionally, the added information does little to ensure our safety and security.

To require an individual to either out their family members or be denied a benefit for which they are otherwise eligible is a mirror of the Malicious Practices Act of 1933 Germany. It is done explicitly for this reason cloaked in the same garb as before - protect the motherland. But it is a farce as as dangerous and evil as it was when the Nazi's did it.

This proposal should not be implemented.

1. It disregards the privacy rights of family members, which may be governed by laws separate and more stringent than the United States'.
2. Places an undue hardship on the applicant to gather data that may not be easily available or accurately recalled. What if a family member has dementia and can't recall all their information? What if a family member misremembers a digit or a letter?
3. The information is not relevant to the applicant's petition for immigration benefits. If the family is not applying for immigration benefits, why should the family's information be a part of the petitioner's application?

4. The family data requested could include the data of people who reside in other countries, and they also risk their personally identifiable information being accessed in the event of a data breach. Who will provide restitution to citizens of other countries when their data is breached because it was gathered by a U.S. agency?

5. This goes beyond the scope of what the Immigration and Nationality Act allows and violates the Administrative Procedure Act by not adequately justifying the legal necessity of requiring the additional information on family members.

6. It places an undue burden on USCIS employees.

7. A petitioner seeking an immigration benefit as an individual - and not as a family - should not have their application affected by said family members.

USCIS-2025-0002 Comment Submitted by L M

For a political party that has historically favored small government, this is an ABHORRENT level of government surveillance. The language says little about what collecting extensive personal and family data will do for public safety and national security, which raises due process concerns. Not that the current admin cares about the Constitution, but the standard is already high. This goes FAR beyond what is reasonably necessary and is clearly an administrative power grab so the Trump admin can flex their muscles and sneer at vulnerable populations. Make America Empathetic Again

I strongly oppose the proposed rule to collect additional data, including all emails and phone numbers used by applicants. This rule exposes USCIS to significant vulnerabilities that could be exploited by anti-immigration groups to disrupt the agency's operations.

Consider this scenario: an anti-immigration group could create a fraudulent USCIS case-tracking website designed to lure prospective immigrants. Once someone registers an account on this site, millions of email aliases could be automatically generated in their name. As a result, the applicant would be "associated" with these millions of emails, and when they submit a petition to USCIS, they would be forced to disclose all of these addresses.

If enough applicants fall victim to such a malicious website, USCIS would be faced with an overwhelming number of email addresses to investigate, potentially reaching billions. This would effectively paralyze the agency's ability to operate efficiently.

I urge USCIS to reconsider this rule and take into account the potential for malicious exploitation. A more thoughtful approach is needed to protect both applicants and the integrity of the agency's operations.

USCIS-2025-0002 Comment Submitted by Anonymous

I am vehemently against this change, as I fear it will be weaponized against vulnerable demographics and used against them while anyone who can or is willing to shell out to enrich Trump or Musk will be allowed to skirt this. Additionally, domestic terrorists are not monitored or tracked to the same degree and pose a far greater risk. This is not a change that benefits anyone except bigots.

This proposed USCIS rule is an overreach that violates privacy and due process. Requiring applicants to provide phone numbers, emails, and whereabouts of their family members forces disclosure of personal information from people who have not consented to having it released. It creates unnecessary government surveillance, and could put relatives at risk. There are no safeguards to prevent misuse or data leaks. USCIS already has strict vetting processes, and this adds needless bureaucracy without improving security and is the opposite of government efficiency. This rule normalizes invasive data collection and further erodes individual rights of those in America.

USCIS-2025-0002 Comment Submitted by Anonymous

There is no reason to add 2,000,000 hours of federal bureaucracy to collect additional information on people's personal lives. There should not be more overreach into people's personal lives than is expected of a naturalized citizen. The immigration screening process is already quite burdensome as it is.

USCIS-2025-0002 Comment Submitted by Anonymous

The proposed collection of information totally fails to "minimize the burden of the collection of information on those who are to respond". USCIS should not be redundantly collecting information that it already has access to. In particular, Form I-751 changes mostly involve collecting information that USCIS should already know, either through Form I-485 or through the immigrant visa process.

I am writing to express significant concerns about the U.S. Citizenship and Immigration Services (USCIS) proposal to collect social media handles from applicants seeking immigration benefits. While I understand the stated goals of enhancing national security and identity verification, this regulation raises serious issues regarding data processing after collection, free speech implications, and broader risks of ineffectiveness and misuse. I urge USCIS to reconsider this policy for the following reasons:

1. Unclear Data Processing and Long-Term Privacy Risks

The proposal does not adequately address how social media data will be processed, stored, or protected after it is collected. Social media handles can unlock a wealth of personal information – political views, religious beliefs, and social connections – that extends far beyond what is necessary for adjudicating an application for an immigration benefit. Once collected, what prevents this data from being retained indefinitely or shared with other government agencies or private corporations? The lack of transparency about post-collection safeguards increases the risk of data breaches or misuse, threatening applicants' privacy long after their cases are adjudicated. Without strict limits on retention and access, this policy could create a permanent digital profile of immigrants, ripe for exploitation.

USCIS-2025-0002 Comment Submitted by Melodie Pimentel

2. Chilling Effect on Free Speech

Collecting social media handles poses a direct threat to applicants' right to speech. Immigrant applicants, aware that their online activity could be scrutinized, may feel pressured to self-censor their opinions or associations to avoid misinterpretation by USCIS officials. Social media is a critical platform for expression, particularly for immigrants who may use it to connect with communities or voice perspectives on issues affecting their lives. The fear that a post could jeopardize their immigration status could suppress lawful expression, undermining First Amendment principles and creating an atmosphere of distrust.

3. Potential Exploitation by Third-Party Contractors Like Palantir

The social media data collected under this rule could be fed into advanced analytics platforms operated by third-party contractors, such as Palantir. Palantir's software, designed to integrate and analyze vast datasets – including social media posts, financial records, and personal connections – could transform applicants' social media handles into detailed profiles of their lives, associations, and beliefs. This data could be used not only to assess applications but also to flag individuals for broader surveillance or enforcement actions, even absent evidence of wrongdoing. This policy risks enabling a level of profiling that exceeds USCIS's stated purpose, amplifying privacy violations and potential abuses without clear oversight or applicant consent.

The proposed rule to collect social media handles from immigrant applicants is flawed in its approach to data processing, its impact on free speech, and its questionable utility. Rather than improving security, it risks creating a surveillance-like framework that erodes privacy and expression while straining agency resources.

I am writing to express my concerns regarding the proposed changes outlined in the document published on March 3, 2025.

Firstly, the proposed data collections requirements may lead to redundancy, cause confusion and inefficiency for users who are already navigating complex administrative processes.

Secondly, the new data collection requirements may impose a significant administrative burden on both users and the federal agency. The increased volume of data to be collected and processed will require additional resources, time, and effort from all parties involved. This could potentially divert attention and resources away from other critical tasks and responsibilities for applicants and the agency. For applicants, this also increases the potential for inadvertent errors, for which they may incur significant delays and penalties including petition or benefit denials.

USCIS-2025-0002 Comment Submitted by Anonymous

Furthermore, the proposed changes raise serious privacy implications. Collecting and storing excessive personal information increases the risk of data breaches and unauthorized access.

In light of these concerns, I urge the federal agency to reconsider the proposed changes and explore alternative approaches that minimize redundancy, reduce administrative burden, and enhance privacy protections. Collaboration with stakeholders can help identify more efficient and secure methods for data collection that align with the goals of the agency while safeguarding the interests of users.

Thank you for considering my comments.

USCIS-2025-0002 Comment Submitted by Anonymous

The additional proposed data is extensive, and the new 1/20/25 application had zero prior notice before being implemented. There will be an additional burden imposed on the applicant to retrieve all the additional data. Many applicants may not have easy access to expired documents (like passports) that are over 5 years expired. Many applicants will not have contact information for children that are over age 18 and are missing; estranged, or no longer in contact for whatever personal reasons they have. I foresee an additional 10 hours of burden for applicants to fill out their applications with the new information being requested. The gender question is not inclusive. There are also trainings and workshops being cancelled, which will end up creating personal bias for adjudicators.

Our agency wishes to formally express concerns regarding the proposed changes to the N400 application under Executive Order 14161. These changes raise significant issues related to privacy, inequity, and efficiency of processes.

The proposed requirement for information spanning up to 10 years imposes an unnecessary burden on applicants and introduces potential data security risks. Additionally, requiring details about other family members without their consent is unacceptable. There is no promise that this sensitive information will be stored safely and remain protected.

USCIS-2025-0002 Comment Submitted by Anonymous

Currently, the N400 application consists on average 14 pages, but the proposed changes would increase it to 26 pages. The inclusion of additional family member information, particularly regarding siblings, seems unnecessary and irrelevant to the eligibility criteria for naturalization, appearing more as a data collection exercise than a meaningful requirement.

Asking for details such as the point of contact upon entry to the U.S. and the number of family members could place undue pressure on applicants, especially in situations involving potentially abusive relatives or deceased family members, forcing them to relive painful experiences. Collecting such data points would also disproportionately impact our community members who are experiencing memory loss or early signs of dementia, as they may be unable to provide such information.

Furthermore, the proposed requirement for extensive family background details would result in additional background checks, causing delays in the interview process and adding unnecessary stress for both applicants and officers.

We strongly urge that these proposed changes be reconsidered.

Subject: Serious Concerns Regarding Proposed Changes to N400 Application

As a citizen of the United States, I wish to formally express concerns regarding the proposed changes to the N400 application under Executive Order 14161. These changes raise significant issues related to privacy, inequity, and efficiency of processes.

The proposed requirement for information spanning up to 10 years imposes an unnecessary burden on applicants and introduces potential data security risks. Additionally, requiring details about other family members without their consent is unacceptable. There is no promise that this sensitive information will be stored safely and remain protected.

USCIS-2025-0002 Comment Submitted by Cynthia Wang

Currently, the N400 application consists on average 14 pages, but the proposed changes would increase it to 26 pages. The inclusion of additional family member information, particularly regarding siblings, seems unnecessary and irrelevant to the eligibility criteria for naturalization, appearing more as a data collection exercise than a meaningful requirement.

Asking for details such as the point of contact upon entry to the U.S. and the number of family members could place undue pressure on applicants, especially in situations involving potentially abusive relatives or deceased family members, forcing them to relive painful experiences. Collecting such data points would also disproportionately impact our community members who are experiencing memory loss or early signs of dementia, as they may be unable to provide such information

I am strongly opposed to this regulation. It is not clear how the collection of information like email and telephone history is relevant to naturalization eligibility, and this regulation cannot move forward without justifying these practices to the public.

USCIS-2025-0002 Comment Submitted by Anonymous

As it stands, this regulation is unfairly invasive to individuals seeking a legal path to citizenship in the United States, and I have serious concerns that the data that DHS collects would be used to affect applicants in a biased and prejudicial way. As others have noted, this regulation also appears to violate first amendment protections, affecting legal residents. This Federal Register notice and the underlying EAs that support it present a serious challenge to the balance between national security and constitutional rights, but further still to the stated efficiency goals of the Trump Administration that are being perpetuated through DOGE. The comments are primarily directed to the first statement: Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility. The broad scope of data collection, combined with a lack of specific safeguards and transparency, raises significant concerns about potential violations of the Fourth Amendment's protection against unreasonable searches and seizures. The absence of clear metrics for assessing the data collected, and the lack of clarity around how collected "identifiers" will be used, creates a chilling effect on First, Fourth and Fourteenth Amendment rights, as individuals may self-censor their speech to avoid government scrutiny and have no access to prevent misuse of their and their family's data. The government must provide greater clarity and establish robust safeguards, including specific limitations on data collection, clear standards for its use, and mechanisms for oversight and accountability, to protect fundamental constitutional rights and ensure that any intrusion on privacy is justified by a compelling government interest and is narrowly tailored.

Further comments below in detail:

â€¢Lack of Specificity and Transparency: The approach lacks specificity about what data will be collected and stored and for how long, how it will be used, and what safeguards will be in place. This lack of transparency increases the risk of abuse and mission creep. The use of "identifiers" without a clear definition is particularly concerning. In particular, over the past few months, it appears a very ineffective method has been used for assessing and implementing the Executive Order Ending Radical and Wasteful Government DEI Programs and Preferencing. The technical implementation of this has focused on a keyword-based algorithm that has resulted in the loss of key historical figures on DOD websites and programs such as the Tuskegee Airmen, the Navajo Code Talkers, Jackie Robinson, and more. If a similar type of faulty query were built to review relationships, the government falsely identify immigrants and say they are related to terrorist or have terrorist connections with no basis to dispute. There is also nothing in the rule to ensure that this data will not be used to dox US citizens or immigrants and their family like the recent failure where hundreds of social security numbers were leaked due to the JFK records declassification.

â€¢Impact on Government Efficiency: The notice fails to adequately describe how this data collection will improve government efficiency, KPIs, or time to resolve issues. It does not outline the hiring needs to support the initiative and how that affects the reduction of force in progress. It does not provide a clear cost-benefit analysis to justify the potential infringements on the constitutional rights of residents and citizens alike. While the rule addresses the amount of estimated time a respondent would need to collect and share the information, it does nothing to address the true cost to the public of the initiative. It also vastly underestimates the true number of hours it takes to fill out these forms which could easily be 8 or more to collect all the information not just about 5 years of your own personal history but that of all family members including siblings and children. For a married person with children they could be collecting information on 10-20 people there is no way less than an hour is adequate. And if they miss one data element, you say they lied and either deny the visa or deport them. How much time will USCIS reviewers at all levels of the approval process spend on reviewing the social media accounts of immigrants? What is the cost to taxpayers of each of those hours? How much extension is expected in the processing timelines as a result of this collection? What are the Assessment of legality:

â€¢The Fourth Amendment protects individuals from unreasonable searches and seizures. The collection of data, especially without warrants or probable cause, raises significant Fourth Amendment concerns.

â€¢Carpenter v. United States (2018): This Supreme Court case established that obtaining cell-site location information constitutes a Fourth Amendment search, requiring a warrant. This precedent highlights the Court's recognition of the significant privacy implications of digital data collection.

â€¢Katz v. United States (1967): This case established that the Fourth Amendment protects "reasonable expectations of privacy," which is highly relevant in the context of digital data.

â€¢This is particularly true when resident aliens are obligated to demonstrate contact (either through family or through employment) with US citizens. How will the rights of privacy and due process of US Citizens be protected?

â€¢The First Amendment protects freedom of speech. Government monitoring of location and contact information both domestically and internationally is extensive and particularly beyond any right at the naturalization stage. A US citizen should not have to give up extensive privacy rights to be tracked indefinitely.

â€¢NAACP v. Alabama (1958): While not directly about digital speech, this case established that compelled disclosure of membership lists could chill associational rights, a principle that could be applied to concerns about government surveillance of the additional 16 data factors.

â€¢Freedom of Religion, Universal Declaration of Human Rights, and the Geneva Conventions:

â€¢The government's application of the â€œextreme vettingâ€œ assessments to date over the past few weeks have been targeted towards Pro-Palestinian demonstrators. Within that context, targeting social media results may lead to punishment of Muslims, Christians or Jews for believing that genocide of the Palestinian people is against both the Universal Declaration of Human Rights and the Geneva Conventions. The pro-Palestinian movement has been conflated with the assumption that believing in the right to freedom means that you support terrorism by government agencies. That logic fails on many fronts.

â€¢The Universal Declaration of Human Rights (UDHR), Article 18, guarantees the right to freedom of thought, conscience, and religion. This includes the freedom to hold beliefs and express them. These rights are ratified by the United States in the Constitution. Similarly, it highlights the fundamental human rights, including the right to life and freedom from discrimination.

â€¢The Geneva Conventions are a set of international treaties that establish standards of international law for humanitarian treatment in war. Genocide is clearly prohibited by international law and is considered a war crime, and a crime against humanity.

â€¢On November 5, 1988, the US ratified the UN Convention on the Prevention and Punishment of Genocide. The definition of genocide expressed in this document is the following: In the present Convention, genocide means any of the following acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such: (a) Killing members of the group; (b) Causing serious bodily or mental harm to members of the group; (c) Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part. It is a fair criticism of the US government that providing weapons and intelligence to Israel has the effect of denying access to food and water and leading to a constant bombardment of homes to destroy

Email address(es) used in the last ten (10) years - this is a ridiculous requirement. Emails are created so easily, and many people create additional accounts to benefit from first-time order discounts, to replace emails with lost authentication data, to create a separate login to a certain website. People may not even track those emails but abandon them once they become useless due to an overload of junk mail. It is unreasonable to expect individuals to track all of their emails. Email accounts that are stolen can be used for malicious purposes without the user's knowledge or ability to do damage control.

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Anonymous

These regulations present a wide net of information that does not appear to be based on the specifics of one particular applicant's desire to emigrate to the United States. An example of this overreach is the requirement for "Family Member Telephone Numbers (parent, spouse, siblings, and children) used from the last five (5) years." Why would you need all of these phone numbers to determine the request of one person? Perhaps the person requesting a visa has little contact with these family members; or the family members are in situations where their safety needs require keeping private their phone numbers. This proposal appears as an unnecessary wide search for information when the applicant should be the focus of the information gathering and not his/her family members (unless they too are requesting entry simultaneously.)

USCIS-2025-0002 Comment Submitted by Joseph Bocchicchio

I have been volunteering as an instructor to teach citizenship classes for the better part of the last 4 years. The changes that are being considered to the N400 are unnecessary and represent a discriminatory obstacle for immigrants who are Green Card holders and who are most often already acclimated to the USA, are working, getting educations, raising families, paying taxes, and contributing to the communities that they live in. Like most of the rhetoric and actions of the current administration in Washington, the proposed changes to the N400 are a solution in search of a problem. As in the past, the truth of the matter is that immigrants make America great. I urge you to abandon this needless and punitive proposal.

USCIS-2025-0002 Comment Submitted by Anonymous

This proposed USCIS rule is an overreach that violates privacy and due process. Requiring applicants to provide phone numbers, emails, and whereabouts of family members forces disclosure of personal information from people who have not consented. It creates unnecessary government surveillance and could put relatives at risk. There are no clear safeguards to prevent misuse or data leaks. USCIS already has strict vetting processes, and this adds needless bureaucracy without improving security. This rule normalizes invasive data collection and further erodes individual rights. It also will erode the efficiency of the process and cause undue stress on an already stretched system.

USCIS-2025-0002 Duplicate Comment Submitted by Anonymous See attached file(s) https://downloads.regulations.gov/USCIS-0103/attachment_1.pdf

I strongly object to the scope of personal data USCIS seeks to collect—particularly regarding applicants' family members.

USCIS should not be requesting detailed personal information—such as phone numbers, dates of birth, and residential addresses—of extended family members like siblings. This level of scrutiny is excessive, unnecessary, and deeply concerning. The burden placed on applicants to collect and report this information is unjust, especially considering that many people may not have ongoing relationships or regular contact with certain relatives. There is no clear justification for why such sensitive data from individuals not applying for any benefit must be disclosed.

This practice risks chilling participation in lawful immigration processes and fosters fear in immigrant communities. It sends the message that simply being related to an applicant puts a person under government surveillance, which is unacceptable.

USCIS-2025-0002 Comment Submitted by Anonymous

Even if not explicitly stated, the request for family members' personal data raises serious concerns about the potential misuse of this information. USCIS must not collect information that could be used, directly or indirectly, to target or take enforcement action against undocumented family members or those with unresolved immigration status. This is especially critical in mixed-status families.

The claim that the proposed changes impose a \$0 cost on the public is misleading and inaccurate. Gathering up to ten years of contact, email, and employment history for oneself and one's relatives is time-consuming and, in many cases, requires the assistance of legal counsel. For many applicants, especially those with limited means, these requirements impose a real and significant financial burden.

This proposal overreaches and violates basic principles of fairness and privacy. USCIS should not collect such intrusive information about applicants' family members without a compelling, clearly articulated reason. The agency must scale back these proposed questions and restore trust in the immigration system by respecting personal boundaries and focusing only on data that is truly necessary to evaluate eligibility.

USCIS-2025-0002 Comment Submitted by Catholic Legal Immigration Network, INC See attached file(s) https://downloads.regulations.gov/USCIS-0105/attachment_1.pdf

This proposed information collection raises apprehension to the individual's privacy. It requires the individual to provide their phone numbers, email address, and detailed information about family members which could affect the immigrant's that are exploring benefits. When it comes to these extensive background information on immigrants, it could allude to disadvantages, biased selection, and unfair treatment. It could be discriminatory to those that come from certain circumstances or someone that practices certain religion. Another disadvantage of this information collection is that it can require a lot of time and it can cost an individual a large amount of money to get these type of background information. This proposed plan could hinder any migrant that is seeking asylum. It also does not state how the individual's information will be protected and have the right to privacy to the collection of data. There is also a lack of data of this proposed plan that it is going to strengthen national security. While I understand the concerns and proposing extra safe measures, a plan that is effective, efficient, and fairly dissecting immigrant's application without prying into the individual's privacy. In conclusion, national security is a big priority, but this proposal imposes unnecessary burdens to the immigrants.

I do not agree with this proposed USCIS rule. It appears to violate the privacy of family members who have not given permission to share their phone numbers, email addresses, and locations. It also adds unnecessary paperwork time to the already long USCIS forms that applicants have to fill out. The forms as they exist today already provide enough information to successfully vet the applicant.

Also, the additional cost to the USCIS budget could end up being huge. An extra 2.75 million hours of work by the applicants is just the beginning. All this extra information will then have to be followed up on by USCIS staff which means more cost to the government in workers' hours. It would also mean the response time from the USCIS would be longer.

Additionally, this proposed rule does not address how all this sensitive, private information will be protected. Data security is very important and there is no mention of it in this proposed rule.

USCIS-2025-0002 Unrelated Comment Submitted by Nicole Woods
USCIS-2025-0002 Unrelated Comment Submitted by Luis Espino
USCIS-2025-0002 Unrelated Comment Submitted by Luis Espino

test
test test test test
test
test test test test

The Department of Homeland Security should not amend any of the USCIS forms to obtain these data points. The proposed data points will not necessarily assist USCIS in security screening or analyzing a benefit request. For example, requesting a "U.S. Point of Contact Name" serves no extra purpose in I-751 cases; the U.S. citizen or lawful permanent resident who filed the I-129F Petition or the I-130 Petition automatically qualify as the I-751 petitioner's American "point of contact." Requiring a "point of contact" on the I-751 Petition will waste time and serves no logical purpose since the regulations governing I-129F and I-130 adjudication currently require that the American "point of contact" provide personal data sufficient for investigatory purposes. See 8 C.F.R. 204 provisions. Furthermore, during the status adjustment (I-485 Form) process or consular processing (DS-260 Form), the American point of contact must provide very extensive financial information in an affidavit of support (I-864 Form); this financial information provides a sufficient basis for USCIS to conduct a thorough investigation. Overall, DHS does not need to obtain additional data on these forms as the agency may simply issue a Request for Evidence if a security threat or other concern warrants obtaining certain information.

USCIS-2025-0002 Comment Submitted by Anonymous

What the USCIS is going to be using forward should be completely unacceptable. There is absolutely no need for them to need any email addresses or phone numbers. Anything an immigrant has or has used in their past should not reflect where or not they will be granted citizenship. The U.S. should begin to focus on other issues within these same walls. Other issues could include something like the detention centers that they hold immigrants hostage in. An email or phone number should never be necessary to provide, especially when being in a battle to gain their citizenship

Part 1 of 6+:

Agency Information Collection Activities; New Collection: Generic Clearance for the Collection of Certain Information on Immigration Forms Enhanced Vetting Form Revision for Forms N-400, I-131, I-485, I-751, I-730, I-590, I-589, I-829 and I-192
Comment submitted 04/29/2025 for Notice published 03/03/2025

Opposition to New Collection: Generic Clearance for the Collection of Certain Information on Immigration Forms

This is an unlawful proposed collection of information under the Paperwork Reduction Act (PRA), the Administrative Procedures Act, and the Privacy Act, and it will have extremely adverse economic impacts on US citizens and businesses as well as on USCIS. Pursuant to 5 CFR 1320.9, as part of the agency submission to OMB of a proposed collection of information, the agency (through the head of the agency, the senior official, or their designated) shall certify (and provide a record supporting such certification) that the proposed collection of information: (a) is necessary for the proper performance of the functions of the agency, including that the information to be collected will have practical utility; (b) is not unnecessarily duplicative of information otherwise reasonably accessible to the agencies; (c) reduces to the extent practical and appropriate the burden on persons who shall provide information to or for the agency. This proposed information collection clearly violates 5 CFR 1320.9(a), (b) and (c), and would also have a substantial adverse economic impact on US citizens and on USCIS's fiscal solvency. Further, it violates the Privacy Act and the Administrative Procedures Act.

Violation of 5 CFR 1320.9(a):

The proposed collection of information identified as data elements 15 through 24, regarding the extensive biographical information (names, addresses, birthdates, nationalities, phone numbers, email addresses, employment history, etc.) of the benefit requestor's living and deceased parents, siblings, half siblings, spouse, former spouses, and children is in violation of 5 CFR 1320.9(a) because there is no practical utility to the proposed collection and the information is not necessary or relevant to determining eligibility of the requestor for the benefit(s) sought.

5 CFR 1320.3 defines "practical utility" as the actual, not merely the theoretical or potential, usefulness of information to or for an agency, taking into account its accuracy, validity, adequacy, and reliability, and the agency's ability to process the information it collects (or a person's ability to receive and process that which is disclosed in the case of a third party or multiple disclosures) in a useful and timely fashion. In the case of record keeping requirements or

None of elements 15 through 24 have any relevance to the eligibility requirements for the nine impacted forms. For example, elements 23 and 24 require the business telephone numbers and business emails from the last 5 and 10 years, respectively, even though none of the impacted forms involve any eligibility requirement of employment. Under no circumstances would there be the possibility of drawing even an attenuated line between the applicant's work email address from 10 years ago and their eligibility for the benefit sought. The only explanation included in justification of the proposed collection is a vague statement that the information will be used for "vetting." However, the "vetting" must be related to an element of statutory or regulatory eligibility in order to meet the practical utility requirement and justify the proposed information collection. Instead of providing any explanation of how the proposed collection will have practical utility, the supporting statement for this "generic form revision" states that the collection is mandated by Executive Order 14161 and that, "data will be collected from certain populations of individuals on applications for immigration-related benefits and is necessary for the enhanced identity verification, vetting, and national security screening and inspection conducted by USCIS and required under the E.O." Nonetheless, an EO is not law. An executive order is a statement of executive policy and does not supersede the statutes and regulations which apply to the adjudications of Forms N-400, I-131, I-485, I-751, I-730, I-590, I-589, I-829 and I-192. There is no statutory or regulatory authority which requires any of the information from data elements 15 through 24 in order to determine eligibility for any of the impacted immigration benefits requests and the does not create new law to support the collection.

Violation of 5 CFR 1320.9(b):

The proposed information collection of the data elements identified as numbers 1-7, and 15-16, is in violation of 5 CFR 1320.9(b) because these data elements are already collected on the identified forms or in the case of data element 3 "reasonably accessible to USCIS. Adding these data elements to the form again would therefore be unnecessarily duplicative of information otherwise reasonably accessible to the agencies" in violation of the regulation, because this information is literally already collected on the form.

The generic clearance proposes adding 24 new data elements to nine (9) existing immigration forms (Forms N-400, I-131, I-485, I-751, I-730, I-590, I-589, I-829 and I-192). However, data elements numbered 1 through 7 already appear on all of these forms except for the I-751, which contains all of the elements except one. The I-751 is only missing data element number three "sex." Furthermore, the I-751 petition does not need to include the petitioner's sex, because the petitioner's sex is literally printed on their "conditional resident card," a copy of which is required to be submitted with the I-751 petition. Thus, the I-751 petitioner's sex is reasonably available to the agency in systems and printed on the petitioner's green card and there is no

Part 3 of 6+:

Data elements 15 and 16 require a "U.S. Point of Contact Name and Phone Number if the Applicant is Located Outside of the United States." These two data elements violate both 5 CFR 1320.9(a) and (b). If the benefit requestor is located outside of the United States for example, Form I-730 then there is necessarily a U.S. petitioner who is filing for the benefit. In such cases the petitioner's name, address and phone number is already captured in each applicable form. Thus, any new collection of a "US Point of Contact" would be entirely duplicative of "Petitioner's Name and Contact" already collected on the forms. Otherwise, these two data elements violate 5 CFR 1320.9(a) because there is no practical utility in requiring a "US Point of Contact" on many of the forms where a US contact for the applicant is not a requirement for eligibility. For example, Form I-590 relates exclusively to applicants located outside of the United States. However, individuals applying for refugee status outside of the United States are not required or expected to have any relative, friend or acquaintance living in the US as a "US Point of Contact." Furthermore, in addition to being utterly irrelevant to an applicant's eligibility for the benefit sought, and therefore failing to meet the practical utility requirement under (a) the intended collection is also entirely ambiguous. What is a "U.S. Point of Contact"? Could it be a Facebook friend that the applicant has never met? Accordingly, data elements 15-16 violate the PRA.

Violation of 5 CFR 1320.9(c):

The proposed information collection drastically increases the amount of time that benefit requestors must spend on the identified forms, creating an unjustifiable burden on the public in violation of the PRA under 5 CFR 1320.9(c). The proposed information collection will increase the length of the nine identified forms by 6 to 10 pages in most cases and the overall hourly burden for most forms will increase exponentially. The burden on the public will be astronomical since, not only will requestors need to write/type responses to the dozens of new questions, but they will have to conduct extensive research to obtain biographic information for living, deceased and potentially estranged relatives. By USCIS's own estimation, approximately 3.5 benefits requests were filed in 2024 which will be impacted by the new information collections.

The supporting statement for this proposed collection disingenuously seeks to minimize the estimated increase in burden on the public by 1) underestimating and misrepresenting the increase in burden that will result from the new collection, and 2) by proposing a simultaneous, separate information collection for the same nine forms under another Federal Register announcement so that the estimated burden increase does not calculate the aggregate impact of both proposed new collections.

Part 4 of 6+:

Because for some forms, the new collection will involve obtaining and reporting vast quantities of biographical information for a requestor's parents, siblings, former spouses, and children, both living and deceased, benefit requestors will need to contact the family members (if living) or do historical research, in order to provide the address, DOB, residence history, etc., for all of these family members, some of whom may be dead or estranged. This takes far more time than the estimated burden of .73 to 1.27 hours, which appears to have been calculated based on the amount of time it takes to merely write down or type the responses to the proposed new questions. Thus, USCIS must recalculate the proposed burden by including the amount of time necessary for the public to gather the information responsive to the proposed collections, and not merely the time it takes to write down an answer to each new question. Ultimately, the burden on the public to add the proposed data elements will constitute an unjustifiable increase in burden, although the FRN announcement mischaracterizes the burden increase as insignificant.

USCIS-2025-0002 Comment Submitted by Natalie Teague

In addition to mischaracterizing the estimated burden increase, the supporting statement seeks to downplay the burden increase by describing only the added time to each form without comparing it to the current time needed to complete each form. This effectively conceals the reality that in many cases, the percent increase in burden will be more than 100% per form. The supporting statement indicates that the burden per response will increase by .73 hours in the case of Form I-485, to 1.27 hours in the case of Form I-730. The current burden for Form I-730 as indicated on Form instructions is 40 minutes or .66 hours. As such, according to the supporting statement, the burden for Form I-730 will increase from 40 min to 115.8 min, an increase of nearly 200%. Furthermore, as previously explained, because the estimated burden increase has been disingenuously underestimated, the true burden increase on applicants is likely to be far more than 200% per form.

Second, this proposed collection violates 5 CFR 13.20.9(c) by proposing a simultaneous, separate information collection for the same nine forms under another Federal Register announcement so that the estimated burden increase does not calculate the aggregate impact of both proposed new collections. USCIS announced two separate proposed collections identified as 2025-03436 (90 FR 11054) and 2025-03492 (90 FR 11324), two days apart on March 3 and March 5, 2025, respectively. Both collections impact the same nine forms; Forms N-400, I-131, I-485, I-751, I-730, I-590, I-589, I-829 and I-192. Although USCIS could have announced both proposed Form revisions in a single announcement in order for the public to understand the cumulative impact of the two revisions in the aggregate, USCIS intentionally made separate announcements to confound the public and make it extremely difficult to ascertain the combined impact on each of the 9 forms. For example, under 90 FR 11054, the estimated increase in burden for Form I-485 is .73. Under 90 FR 11324 the estimated increase in burden for Form I-485 is .08 hours. USCIS has provided no justification for announcing simultaneous form revisions for the same forms in separate federal register notices. This subversive and disingenuous approach to providing notice through the federal register announcements violates 5 CFR 13.20.9(c) by creating an

Part 5 of 8:

Adverse Economic Impact to Citizens and USCIS:

The extraordinary economic impact of this form revision will result in increased costs that will adversely impact both US citizen and noncitizen applicants/petitioners, and will have a profound impact on USCIS's operating budget, drastically increasing expenses to the agency due to the time resources necessary to review the exponential increase in information collected on some of the agency's most numerous forms (N-400, I-485, etc.). The vast new information collection will drastically increase the amount of time that adjudicating officers must spend with each form in order to review and make a decision, increasing the amount of time, personnel resources and money the agency must dedicate to each application or petition in order to adjudicate it. Because the adjudication of USCIS benefits requests are paid for through a combination of applicant fees (for example, the I-751 and N-400) and congressional appropriation (for example, the I-590), the increased personnel resources needed to adjudicate the much lengthier forms will economically impact both the public and the related congressionally appropriated programs. The much lengthier forms will also certainly result in substantial increases to USCIS processing times, and create immense backlogs that will harm US citizens and US companies. Furthermore, the increased expense associated with the form collection may bankrupt the agency. This occurred in 2020 when the first Trump administration forced USCIS to engage in fiscally irresponsible policies. In 2020, USCIS announced that it planned to furlough 13,400 employees due to a projected budget shortfall which was caused in part by the agency's adoption of time-intensive and costly "enhanced vetting" processes which decrease agency efficiency and have not proven effective at identifying grounds to deny cases. The planned furloughs were canceled after Congress passed the Emergency Stopgap USCIS Stabilization Act, illustrating how this type of fiscal irresponsibility results in adverse economic impacts. The self-same vetting EO is now being employed to add the vast new information collections identified in this federal register notice to nine of USCIS's most high-volume forms. This information collection, in addition to being violative of the PRA as previously explained, is also fiscally outrageous and will likely result in the fiscal insolvency of USCIS, just as it did five years ago.

(Please continue to Part 6 of 8+ as the system will not allow upload of files, (in pdf, Word, or compressed pdf) that are within the required 10 MB, to this site via multiple browsers, including Edge, Chrome, and Firefox. The text box only allows 5,000 characters, not words: characters. Therefore, this comment spans multiple submissions.)

Part 6 of 8:

USCIS has not explained what it will do with the information it will collect on the many family members of benefit requestors, however it must be presumed that the agency will be doing some type of comparative analysis, vetting or other scrutiny of this information. Conducting "spider-webbing" vetting on the numerous family members for which USCIS will be collecting information—however the agency ultimately implements its review of the collected information—will take additional resources. Even if not the express intent of this proposed collection, it is likely that the downstream economic consequences of this collection will plunge USCIS into economic ruin and destroy the US immigration benefits infrastructure which is critical for families, businesses and the public interest. Despite this, the supporting statement for the proposed information collection boldly misrepresents the monetary cost burden to the public. It states that, "An estimate of the total public burden (in cost) associated with the collection: The estimated total annual cost burden associated with this collection of information is \$0. No additional costs to the public are anticipated due to this action. Any costs to the respondents associated with the specific form filed are captured in those approved collections." The supporting statement further states that, "An estimate of the total public burden (in hours) associated with the collection: The total estimated annual hour burden associated with this collection is 2,750,064 hours." Indeed, approximately 3.5 million forms falling in the impacted categories were filed with USCIS in fiscal year 2024, according to the USCIS statistics website (see <https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data>). In assessing that there will be a total of \$0 increase in cost on the public of adding these numerous new information collections to 3.5 million forms per year, the supporting statement disingenuously infers that the only "cost" to the public is the amount of time that applicants will now have to spend on each form, discounting the fact that adding millions of hours to the time needed to adjudicate benefits will increase costs to the agency once USCIS has to find a way to pay for the added expense of completing each adjudication. Either USCIS will have to pursue another fee rule and increase filing fees to cover the shortfall—which will cost the public, since they pay the filing fees—or, if USCIS does not seek to raise fees, the agency is likely to suffer fiscal collapse at it did in 2020 prior to being rescued by Congress.

Violation of the Privacy Act:

The proposed information collection of data elements 15 through 22 violates the Privacy Act. The Privacy Act of 1974, codified as 5 U.S.C. § 552a, is a federal law that protects individuals' privacy by limiting the collection, maintenance, use, and disclosure of personal information by federal agencies. Data elements 15 through 22 request extensive biographical information about persons who 1) are not applying for a benefit with USCIS as an applicant, petitioner or beneficiary, 2) have not consented to the provision of their information to a US government agency such as USCIS, and 3) who will include US citizens and LPRs. Furthermore, the unnecessary collection of all the biographic data for non-applicants in elements 15 through 22 will greatly increase the risk of future Privacy Act violations by USCIS because the information will easily be accessible through FOIA releases absent an extensive and onerous redaction process by FOIA

USCIS-2025-0002 Comment Submitted by Natalie Teague

Unrelated Comment Submitted by Natalie Teague

While applicants and petitioners knowingly sign a "Petitioner/Applicant Certification," containing an authorization for release of information in connection with the benefit request that they submit to USCIS, the siblings, parents and children of the applicant do not sign such a release or authorization in connection with the benefit. Nor does USCIS require biographical information about those individuals in order to adjudicate any of the nine forms identified in this federal register notice. Many of these siblings, parents and children may be US citizens or LPRs. An information collection about a US citizen or LPR must be "legally authorized and necessary" in order to comply with the Privacy Act. This proposed information collection violates numerous aspects of the Privacy Act, including the Act's Fair Information Practice Principles (FIPPs). The FIPPs are a set of eight principles that are rooted in the tenets of the Privacy Act of 1974. The principles are:

- 1) Transparency: USCIS has provided no reason or justification for requiring biographical information about non-applicant family members.
- 2) Individual participation: USCIS does not permit any individual participation by the affected family members, who do not sign any of the impacted immigration forms or authorize release of the information that USCIS is obtaining about them.
- 3) Purpose specification: USCIS has not identified any specific purpose for requiring biographical information about non-applicant family members other than generally "increased vetting." But USCIS provides no example or justification as to how the collection of non-applicant family members could legitimately support the "vetting" of an applicant.
- 4) Data minimization: Requesting vast quantities of biographical data about non-applicant family members who are irrelevant to the benefit request maximizes, rather than minimizes the collection of data.
- 5) Use limitation: USCIS has not even minimally attempted to describe the use for which it is collecting the biographical information about non-applicant family members, so there is no way to ascertain whether the scope of the use of the information will be limited.

6) Data quality and integrity: USCIS will collect data of extremely compromised quality and integrity by asking an applicant to provide vast quantities of second-hand information about non-applicant family members. Since the family members themselves are not required or even allowed to review or consent to the release of information about themselves that will be provided by the applicant, there will be no assurance that the data collected will be of any quality or have To Whom it May Concern, I am the staff attorney working at a non-profit organization. I do naturalization work. Most of the people I help are elderly people. Most of them have hard time tracking down phone numbers and emails in the past 5 years. Usually these stuff were handled by their children and they might not even live together with these elderly people. There people don't know how to use email and their children were the one who helped them create one. Without their children being around, they don't know their email address and wouldn't be able to provide the information to me. Similar to their phone number, these elderly people might be under their children's family plan and they cannot track their phone numbers if their children change the number for them. This would create a barrier for them when they try to apply for naturalization.

I oppose. The extra information is burdensome to applicants and will have a chilling effect on them.

This is ridiculous and violates privacy. Why would we do this? I am fully against the proposed information on these forms.

USCIS-2025-0002 Duplicate Comment Submitted by Anonymous I oppose. The extra information is burdensome to applicants and will have a chilling effect on them.

USCIS-2025-0002 Duplicate Comment Submitted by Anonymous I oppose. The extra information is burdensome to applicants and will have a chilling effect on them.

I work with LPRs to assist them in completing their N-400 application. The proposed changes to the form for family and contact information would present a huge hardship for our clients and for my ability to do my job. The administrative burden would be immense and many of the data elements are not realistic for clients to collect. For example, how would a client collect phone numbers and contact information for siblings if they are deceased? What if they are estranged from one of their siblings or their parents? Sometimes clients are estranged from their family members because they have been abused by their family member. Is the US government really asking them to contact them again to ask for their contact info? What is the relative refuses to provide this information? These are not uncommon occurrences. Does this mean our client loses their right to become a US Citizen?

The administrative burden of these proposed changes is simply too high and not realistic. Our clients are law abiding LPRs. They have gone through legal channels and procedures to be eligible to naturalize. The intent of these proposed changes seems to be to make the administrative burden so high that LPR will decline to naturalize and that is not okay. These proposed changes are not necessary in order to adjudicate an application. They are a huge overreach and would have a significant negative impact on our ability to do our work.

I oppose this. Requiring all of this info is a violation of privacy, and yes, immigrants deserve privacy too. I understand the concern of security, but requiring all of this personal information doesn't seem relevant, and it's awful that the government punishes immigrants for even attempting to go through the process legally by creating such unnecessary obstacles. It feels unfair to request information on family members too--people should be held accountable for their own actions, and family members are not always relevant.

Requiring collection of this data and information would not only put an undue burden on those who are trying to gain citizenship and residency through legal pathways and the "correct" way, but also violate the individuals privacy. This data is unnecessary, and if leaked or breached could be a cause for serious personal damage. These regulations would do nothing but slow down immigrants following all the rules and put a larger burden on the organizations and individuals who assist them.

Making these changes will have negative impacts. First, the applications will be too long, difficult to fill out and stressful. So many will not be able to fill it out by themselves. They will need attorneys and not everyone have money for that all the time. Second, people don't necessarily remember all the phone numbers or emails they used in the past. This is absolutely ridiculous. How can anybody track the old phone numbers of family members for example. Collecting all this information is unnecessary. Not to mention that processing time will drastically increase. I guess this is just a way to keep people from applying.

I am writing to recommend against this new generic clearance for the collection of this new information on immigration forms N-400, I-192, I-131, I-485, I-589, I-730, I-751, and I-829. Each of these immigration forms has widely different criteria that are required for approval, so it seems strange that it would be deemed necessary to be added in the same way to each of these forms. Perhaps it would be better to tailor the individual form's content to information needed to adjudicate it.

Three reasons are given for the addition of comprehensive questions about an applicant's extended family members, including their contact info and years they've used that contact info:

- (1) to provide official correspondence to an applicant, and/or
- (2) as secondary data elements to help confirm a subject's identity as it relates to the submitted application and to other records, and/or
- (3) to, internally and with screening partners, help confirm or disprove an association between an applicant and information of interest, and the strength of that association in the context of the underlying information.

For #1, the applicant's contact information is clearly necessary, though not for the applicant's extended family.

For #2, to confirm an applicant's identity, this seems like a very strange goal of the added information on these immigration forms. For most of these forms, the applicant is required to appear for a biometrics appointment and also an interview where the applicant's fingerprints and other biometrics will be taken to seemingly confirm their identity. Is USCIS considering ending the practice of using biometrics appointments? If so, has anything been published to the federal register with this goal in mind? It seems that the agency's current processes are already very successful in proving an applicant's identity and adding these additional questions to the immigration forms would be a waste of time for both the applicants and immigration officers who are federal employees in the executive branch.

#3 involves using the new questions and information on the form to confirm or disprove an association between the applicant and information of interest. Again, these forms are used for widely different goals and have vastly different requirements, I don't understand why the exact same questions should be used in this manner. Also the phrase "information of interest" seems impossibly vague. Is the information of interest completely uniform across these different immigration forms? What information of interest is needed to be confirmed or disproven in order for these forms to be approved or denied? If an applicant does not know when their sibling stopped or started using a different phone number is that grounds for the application to be denied? If they do not know this information, how should they proceed? In conclusion, I think it would be better for USCIS to detail what associations with information of interest is required to be confirmed or disproven in order for an application to be adjudicated, and then tailor each form to these requirements, rather than make blanket changes to many commonly used immigration forms that have totally different requirements, content and purposes. Thank you for your time.

USCIS-2025-0002 Comment Submitted by Natalie Teague

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Alexandra Olins

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by Louis Horn

USCIS-2025-0002 Comment Submitted by Alexandra Ollins

The proposed changes to the N-400 form are unnecessary and burdensome. The proposed collection of information goes far beyond what the government needs to adjudicate these applications. It would be incredibly difficult for people to track down phone numbers for relatives for past 5 years. Some people are estranged from their relatives, sometimes for reasons relating to their personal safety. Some people's relatives will refuse to give them the information. What then? This will place a huge and undue administrative burden on clients who are eligible for immigration benefits. And the government has offered no justification as to why this incredible administrative burden is necessary.

USCIS-2025-0002 Comment Submitted by Alexandra Ollins

I work for an agency that assists clients to complete their N-400 applications. If implemented, these changes would make it impossible for our agency to meet our contract deliverables due to the incredible administrative burden it would place on our staff. As of now, it takes each case manager approximately two hours to assist one client with their N-400 application, which is currently 14 pages long. If these proposed changes are implemented, I estimate that it would take our case managers about five hours per N-400 application. The questions are needlessly complex and would place an incredible and unrealistic administrative burden on my team. We will not be able to hire additional case managers to assist clients, but the time per application would more than double, which means that we would be unable to meet our current contract deliverables, which would represent a severe harm to our agency.

USCIS-2025-0002 Comment Submitted by Anonymous

Asking for telephone numbers, email addresses, date of use for these, and sibling information is excessive and unnecessary. It contributes to the already high processing times for USCIS forms, and such information can be difficult or even impossible to obtain. Some email addresses are no longer in use or have been compromised by scammers and online attacks. This is a systematic attack on minorities, making it difficult for individuals to obtain citizenship by asking for ridiculous amounts of unnecessary information. I am completely against these changes. Please reconsider.

USCIS-2025-0002 Incomplete Comment Submitted by International Refugee Assistance Project

Attached.

Collecting these additional information is unnecessary, thus the updated form will not enhance the quality, utility, and clarity of the information to be collected. Collecting these additional information will not minimize the burden of the responder, it will rather maximize it because these extensive information is not directly related to the case. The current forms have been more than sufficient to collect all the necessary data for USCIS to accept, to adjudicate, and to conclude each case. If there is no such need of change, resources should not be wasted on this matter.

USCIS-2025-0002 Comment Submitted by Anonymous

To Whom it May Concern, I highly oppose the proposed changes to the naturalization application. The requirement of emails, phone numbers, and the like is highly burdensome to the immigrant communities. Such changes will prevent already hesitant immigrants from even applying for naturalization, not to mention a gross invasion of personal privacy. There is no need to record every single email or phone number an individual may have used.

USCIS-2025-0002 Comment Submitted by Anonymous

I'd like to ask USCIS to reconsider collecting all phone numbers and emails used by applicant's relatives because it put enormous amount of work on applicants, especially if they have broken relationship with their family members. It is just impossible for them to collect this type of information. It is also impossible for an applicant to report all phone numbers used in last 5 years. It is very common to use a local phone in another country with a sim card. No one keeps the phone number after the trip. I believe it will cause huge amount of work for USCIS too if USCIS is going to verify each number. It is not practical.

The suggested changes impact most forms that are unrelated to family-based immigration, so including information on extended family members is counterproductive. In what way will information about siblings or parents (living or deceased) assist in assessing the circumstances of the applicant, more so how are they relevant to someone's immigration process? The same goes with individuals' contact information (mobile no., email addresses in the last 5 years).

USCIS-2025-0002 Comment Submitted by Tanya Labrador

The proposed forms create a culture of suspicion and distrust, conveying skepticism towards information presented by people seeking to undergo the proper legal procedure. As a result, vulnerable populations (especially elderly people) will feel more overwhelmed, threatened and disheartened to complete their respective applications.

Ultimately, these revisions will have consequences on the time and effort case managers dedicate to each case. There will be a significant burden in collecting information from all parties involved as it will require more time to recall such info on the client's part and slow down the ability of agencies to efficiently prepare and fill out the forms. This will definitely limit all affected agencies' productivity and restrict case managers' capacity to accept more clients to help.

The suggested changes impact most forms that are unrelated to family-based immigration, so including information on extended family members is counterproductive. In what way will information about siblings or parents (living or deceased) assist in assessing the circumstances of the applicant, more so how are they relevant to someone's immigration process? The same goes with individuals' contact information (mobile no., email addresses in the last 5 years).

USCIS-2025-0002 Comment Submitted by ACRS

The proposed forms create a culture of suspicion and distrust, conveying skepticism towards information presented by people seeking to undergo the proper legal procedure. As a result, vulnerable populations (especially elderly people) will feel more overwhelmed, threatened and disheartened to complete their respective applications.

Ultimately, these revisions will have consequences on the time and effort case managers dedicate to each case. There will be a significant burden in collecting information from all parties involved as it will require more time to recall such info on the client's part and slow down the ability of agencies to efficiently prepare and fill out the forms. This will definitely limit all affected agencies' productivity and restrict case managers' capacity to accept more clients to help.

USCIS-2025-0002 Comment Submitted by Anonymous

I am strongly opposed to this regulation. This regulation violates privacy and due process.

I am writing to register my strong opposition to the proposed information collections.

The proposed information collections are completely unnecessary to processing and adjudicating the forms, as USCIS clearly has been perfectly capable of processing and adjudicating the forms without collecting this information in the past. The proposed information collections are also irrelevant. The proposed information that would be collected about applicants' family members has no bearing on the applicants' eligibility for the benefit sought, and would increase significantly the time burden on applicants and their legal representatives.

USCIS-2025-0002 Comment Submitted by Anonymous

The proposed information collections also constitute fear-mongering. They will deter individuals who are legally eligible for immigration benefits from applying for and accessing those benefits out of confusion and fear as to what will be done with their and their family members' personal information. In applying for an affirmative benefit for which one is legally eligible, an individual should not have to weigh whether moving forward will produce negative immigration consequences for their family members, who are irrelevant to the adjudication of the application for this person's benefit.

The proposed information collections are invasive, overreaching, and will create more work and even more backlog for all parties, including USCIS. They are merely another step in the administration's plan to keep immigrants from accessing benefits for which they are legally eligible. I vehemently oppose these proposed information collections.

USCIS-2025-0002 Comment Submitted by Anonymous

I am writing to register my concern and strong opposition to the proposed collection of additional information about the applicant and their family members. The proposed information collections are overarching, burdensome, and a violation of privacy while at the same time completely unnecessary to processing the forms and vetting the applicant's eligibility. These tactics are used in name of improving national security, but they are really fear tactics to deter individuals who are legally eligible for immigration benefits from applying for and accessing those benefits. For all the talk of government efficiency, the additional data collection will require more time and effort for both the applicant and USCIS. It also increases the risk of potential misuse or unauthorized access to this personal and family information given the sensitive nature of immigration matters. I strongly oppose these proposed information collections and urge the government to reconsider requiring this information and to implement robust safeguards to protect the privacy of individuals.

USCIS-2025-0002 Comment Submitted by International Refugee Assistance Project

See attached file(s)

https://downloads.regulations.gov/USCIS-0148/attachment_1.pdf

I am writing to express my strong concerns regarding the proposed changes to the N-400 form. The request for extensive and often unnecessary personal information, such as telephone numbers, email addresses, dates of use for these contacts, and detailed sibling information, seems excessive and places a significant burden on applicants. These new requirements are both time-consuming and difficult to fulfill, especially for individuals who have limited access to historical data, whose email accounts may no longer be active or have been compromised, or those who have lost contact with family members over time.

For many immigrants, particularly those from marginalized or refugee backgrounds, these new information requirements are not just an inconvenience—they can be a barrier to obtaining citizenship. Applicants often do not have the resources to recover outdated contact information, and asking for such detailed records adds unnecessary complexity to an already long and stressful process. These changes disproportionately affect minority and low-income applicants, making it harder for them to complete their naturalization applications.

USCIS-2025-0002 Comment Submitted by HANH ACRS

The addition of these requirements, while likely well-intentioned, risks further delaying processing times for applicants, many already waiting months or even years for their cases to be reviewed. Moreover, for those whose contact information has been compromised or who simply no longer have access to old phone numbers or emails, these requirements create an impossible task.

I strongly urge USCIS to reconsider these proposed changes. There should be a focus on ensuring that the naturalization process is accessible, fair, and equitable for all applicants, without imposing unnecessary and unreasonable burdens on individuals seeking to become U.S. citizens. The current proposal appears to create unnecessary barriers for those who are already facing significant challenges, and I urge you to prioritize simplification and fairness in any future revisions to the N-400 form.

Thank you for your attention to this matter. I hope that USCIS will take into account the perspectives of affected communities as it moves forward with any changes to the naturalization process.

USCIS-2025-0002 Comment Submitted by Anonymous

It is with great concern that I write this comment. DHS' request to add unnecessary questions to these forms is a complete invasion of privacy not just for the applicant but also for others that an applicant would name and provide information on. What would stop DHS from using the information to targeting other individuals listed? It is clear that this is just another tactic to target and abuse the rights of even more individuals. This is complete overreach by DHS in an attempt to target more people and under the guise of national security.

https://downloads.regulations.gov/USCIS-0151/attachment_1.pdf

USCIS-2025-0002 Duplicate Comment Submitted by American Immigration Lawyers Association

See attached file(s)

https://downloads.regulations.gov/USCIS-0151/attachment_1.pdf

USCIS-2025-0002 Comment Submitted by Seda Norodom

I am an immigration attorney in Southern California and these proposed changes would create a barrier for immigrants to seek immigration benefits. Having to collect numbers, addresses, and emails for the last 5-10 years for the applicant and family members is very burdensome and may be impossible for immigrants with large immediate families. This information does not help determine if an applicant is eligible for an immigration benefit. Please do not add these proposed changes to already lengthy and complicated forms.

USCIS-2025-0002 Comment Submitted by Anonymous

I am writing to voice my opposition to the proposed incorporation of additional questions on immigration forms. It is not necessary for the government to collect historic information in the form of emails and phone numbers, and will create unnecessary barriers for people by making the forms unwieldy and time consuming. Creating more bureaucracy and more requirements does the opposite of streamline government and make it more efficient; it adds red tape and creates burdens for people completing the applications.

USCIS-2025-0002 Comment Submitted by Shara Svendsen

The proposed changes are intrusive overreach. Gathering the requested information would be onerous, especially for vulnerable populations like refugees and asylees. For example, listing employment, phone numbers, addresses, and emails for the past ten years, would be difficult for a mobile population. Listing such information for adult children, siblings, and other family members will be even more difficult.

Many applicants will not have access to expired documents such as identification cards or passports.

The proposed rule violates privacy and due process by forcing applicants to disclose personal information of people who have not consented to such disclosure. The proposed rule unnecessarily increases government surveillance and intrusion, and unnecessarily exposes applicants and their family members (again, who have not consented to disclosure of their information) to data leaks.

The government is currently experiencing an unprecedented level of leaks, with unauthorized groups accessing the private and confidential information kept by various government agencies, including information of U.S. citizens. The proposed rule provides no safeguards to prevent misuse or data leaks.

This proposed rule adds needless bureaucracy without improving security. This rule normalizes invasive data collection and further erodes individual rights.

USCIS-2025-0002 Comment Submitted by Christine Chen

I have been an immigration attorney for 14 years at a legal services non profit organization focusing on assisting low-income, limited English proficient, Asian Americans, Native Hawaiians, and Pacific Islanders. Our organization has a robust program assisting naturalization applicants, assisting over 1200 individuals annually with their citizenship applications, along with full legal representation for individuals who have disability waivers and other complex immigration cases. The proposed changes to the N-400, along with the I-485 and numerous other forms affected to collect extensive information about family members' contact information will have a significant chilling effect on naturalization rates because of many individuals who may come from mixed status families or other personal reasons for not revealing so much personal information that is wholly unnecessary for the adjudication of naturalization. Not to mention, the almost doubling of length in forms and the amount of time and resources for nonprofit organizations and legal service providers to assist individuals would lengthen incredibly, crippling our ability to effectively serve clients and overtax our already limited resources to providing free legal assistance to low income individuals. Even for myself, a US born citizen, raised and educated in the U.S., would not have all this excessive information about family contact information and history that is being requested on the proposed forms. It does not and should not impact the one's individual eligibility to seek the specified form of relief. I implore you to not make such changes to these forms - naturalization and adjustment of status applications would drop significantly, which would also negative impact USCIS who is funded on filing fees of these applications. This would only deplete the resources of the government even more.

Please see the attached letter. Note that the letter contains comments on two separate information collection activities and is thus being submitted for each.

USCIS-2025-0002 Comment Submitted by Jay Martin Steinman

* Agency Information Collection Activities; New Collection: Generic Clearance for the Collection of Certain Information on Immigration Forms (document ID USCIS-2025-0002-0001, Federal Register Number 2025-03436)

https://downloads.regulations.gov/USCIS-0156/attachment_1.pdf

* Agency Information Collection Activities; New Collection: Generic Clearance for the Collection of Social Media Identifier(s) on Immigration Forms (document ID USCIS-2025-0003-0001, Federal Register Number 2025-03492)

As an immigration attorney representing clients from diverse backgrounds and across all visa categories, I strongly oppose the government's continued and expanded efforts to collect additional personal data on foreign nationals, particularly through the collection of social media identifiers. This practice is invasive, ineffective, and threatens core constitutional values.

First, the collection of social media handles raises serious privacy and First Amendment concerns. Foreign nationals, like U.S. citizens, engage in free expression and association online. Compelling disclosure of their social media accounts chills speech and disincentivizes individuals from expressing political opinions, engaging with advocacy groups, or participating in discourse that may be misinterpreted by algorithms or reviewers unfamiliar with cultural and linguistic context. This kind of surveillance undermines the foundational democratic principle of free expression.

USCIS-2025-0002 Comment Submitted by Jen Chen

Second, the policy is ineffective as a national security or vetting tool. There is no credible evidence to suggest that mandatory collection of social media handles improves immigration screening or reduces risk. The volume of data collected becomes unmanageable and burdens agencies with enormous quantities of irrelevant information, making it more difficult "not easier" to identify legitimate security threats. It also opens the door to profiling based on religion, nationality, or political beliefs. Also, in this social media day and age, people might have handles from long ago that they no longer use or remember.

Third, this approach disproportionately targets non-citizens and reinforces harmful stereotypes. The implication that foreign nationals—especially those from particular regions—warrant enhanced surveillance is discriminatory. It fosters a climate of suspicion and sends a damaging message about the U.S. government's commitment to fairness and equal treatment under the law.

As legal professionals working within the immigration system every day, we urge the government to reconsider this policy. National security must be pursued within the bounds of the Constitution. Overbroad surveillance of foreign nationals' online lives is not only counterproductive—it is unjust.

USCIS-2025-0002 Comment Submitted by Anonymous

The proposed rule requires an excess of information with no utility that would be extremely burdensome to provide; in particular: the applicant's phone numbers and email addresses for the last ten years, including start and end dates (Part 2): all addresses and telephone numbers for the last five years for the applicant's parents, spouse, siblings, and children, including start and end-dates (Parts 4, 5, 7, and 8). Who remembers the start and end dates for previous email addresses and telephone numbers? Such information is not necessary for the adjudication of N-400 applications. It has no relevance or practical utility to the naturalization process and adds neither quality nor clarity of information. To require this information would be onerous and invasive.

USCIS-2025-0002 Comment Submitted by Massachusetts Law Reform Institute

Please see attached comment from MLRI.

https://downloads.regulations.gov/USCIS-0159/attachment_1.pdf, <https://downloads.regulations.gov/USCIS-2025-0002-0159/attachment>

Literacy Network writes in opposition to the proposed information collection requests by USCIS (New Collection: Generic Clearance for the Collection of Certain Information on Immigration Forms, docket 2025-0002). Generic clearance is not appropriate for so many time-burdensome items that require highly specific information.

USCIS-2025-0002 Comment Submitted by Literacy Network, Inc

â€¢ Requiring applicants to provide phone numbers, emails, and whereabouts of family members forces disclosure of personal information from people who have not consented and who are not seeking an immigration benefit themselves.

â€¢ There are no clear safeguards to prevent misuse or data leaks.

â€¢ The information collections place undue hardship on the applicant to gather data that may not be easily available or accurately recalled. The typical person does not have the information USCIS proposed to collect on hand, and many of the items USCIS plans to collect may require significant time and effort to find or be inaccessible altogether (for example, if a relative is deceased).

â€¢ The information collections proposed are unnecessary and a misuse of public resources. The proposed collections will slow adjudications and impede USCIS's timely processing of applications.

â€¢ Extreme vetting measures have not proven useful in the past. USCIS already has effective vetting processes; this adds needless bureaucracy without improving security.

People applying for immigration benefits have invested significant time and resources in complying with complex legal requirements. They contribute to the well-being of our communities and want to establish their lives and thrive here in the U.S. They deserve a functional process and the opportunity to pursue their dreams. We appreciate your consideration of these comments.

The N-400's primary purpose is to establish an applicant's eligibility for U.S. citizenship, focusing on lawful permanent resident status, good moral character, continuous residence, and attachment to the principles of the U.S. Constitution. The proposed requirements far exceed what is necessary to assess these criteria.

USCIS-2025-0002 Comment Submitted by Monica Manke

Collecting five years' worth of social media history and family members' personal information is overly burdensome, invasive, and risks deterring eligible lawful permanent residents from applying for citizenship. It could also significantly complicate and delay case processing, harming both applicants and service providers who already face resource constraints.

Additionally, this type of data collection raises serious concerns regarding privacy and the chilling effect it may have on free speech and association, both of which are constitutional rights applicants must demonstrate support for as part of the naturalization process.

I respectfully urge USCIS to reconsider these proposed changes and ensure that the N-400 remains focused solely on relevant factors directly tied to naturalization eligibility.
On Scope and Necessity

Comment: The addition of 24 data elements appears excessive and may infringe on individual privacy rights without clear evidence of necessity.

Supporting Evidence: A 2019 DHS report highlighted the risks of over-collection of data leading to privacy violations without significant security benefits.

On Impact to Marginalized Communities

Question: How will USCIS ensure that the expanded data collection does not disproportionately affect marginalized communities, particularly those with limited access to technology or stable housing?

Supporting Evidence: Studies have shown that increased data requirements can lead to decreased application rates among low-income and minority groups due to accessibility challenges.

On Data Security and Usage

Comment: USCIS should provide detailed protocols on how the collected data will be stored, used, and protected to prevent misuse or unauthorized access.

Supporting Evidence: Past incidents, such as the 2020 data breach affecting over 300,000 immigrants, underscore the need for stringent data security measures.

On Transparency and Oversight

Question: What oversight mechanisms will be in place to monitor the use of the collected data and ensure it aligns with stated objectives?

Supporting Evidence: The Government Accountability Office has previously recommended increased transparency in data collection practices to build public trust.

USCIS-2025-0002 Comment Submitted by Anonymous

USCIS-2025-0002 Comment Submitted by The Legal Aid Society of Cleveland

See attached file(s)

https://downloads.regulations.gov/USCIS-0163/attachment_2.pdf

USCIS-2025-0002 Comment Submitted by Niskanen Center

Please see attached for a copy of our comment.

https://downloads.regulations.gov/USCIS-0164/attachment_2.pdf

USCIS-2025-0002 Comment Submitted by National Immigration Project

See attached file(s)

https://downloads.regulations.gov/USCIS-0165/attachment_2.pdf

Hello, I am a U.S. citizen writing to express concerns about the new information that USCIS wishes to collect on several immigration benefit application forms.

First, I am concerned that USCIS wants to collect information on applicants' "sex" if "sex" can only be that assigned at birth. An applicant should be able to answer that question based on the gender they identify as, whether that be male, female, or non-binary. My reasoning for this is dignity and security-based. If a person presents as a male but was born female, it is both humiliating to make them check off "female" on the application and is inaccurate. As the person now presents and lives as male, DHS officials would likely be confused by seeking an applicant who looks like a woman but actually looks like a man. It would be clearer and less confusing for everyone for "sex" to simply pertain to the person's gender as they present now, rather than their physical sex at birth.

USCIS-2025-0002 Comment Submitted by Bria Yazic

Second, I am concerned that USCIS wants to collect any emails used by the applicant for the last 10 years. In addition to the fact that it may be hard or impossible for the applicant to remember all emails they used in the last 10 years, that list could include work emails that they should not include for confidentiality reasons, and which are likely no longer in service. Additionally, and importantly, emails are personal and there's no need for them to be included in a person's application for immigration benefits.

Third, I am concerned that USCIS wants to collect so much personal information on an applicant's parents, spouse, children, and siblings. Including current contact information on family members (i.e. phone numbers and places of residence) will likely have a chilling effect on applicants filing petitions for benefits for which they are eligible. The family members are not applying for the benefit; the applicant is. I do not see the need for USCIS to collect current contact information for people who are not applying for immigration benefits.

Thank you for considering my concerns.