

Agency ID	Title	Comment	Attachment Files
USCIS	Agency Information Collection Activities; New Collection: Generic Clearance for the Collection of Certain Biographic and Employment Identifiers on Immigration Forms		https://downloads.regulations.gov/USCIS-2025-0006-0001/content.pdf , https://downloads.regulations.gov/USCIS-2025-0006-0001/content.html
USCIS	Comment Submitted by Anonymous	<p>While the faithful execution of EO 14161 is the duty of of DHS, I disagree with the cost assessment. The total public hours of this information collection when combined with previous notice in 90 FR 11326 is 9,450,905 and the agency's assessed cost is \$0 in aggregate.</p> <p>If the public spends nearly 9.5 million hours answering additional questions, how much time will the agency spend reading and drawing conclusions from those answers? In a very conservative estimate, if the agency spends 1/10th of the time reading and assessing that information they are spending 945,000. At an average pay rate of \$65.93 according to the 2025 DHS budget justification to Congress that puts the actual cost of this plan at \$62,306,394. This is not to mention the cost to the OMB to update the forms themselves and CISA.</p> <p>It is not the responsibility of the government to place a dollar value on time of the public. However, it is the department's responsibility to accurately assess and report the real cost to themselves of implementing these policies, something that is a prime concern of the administration. If the real cost to the department is \$0, than the information being collected is not being reviewed. In which case policy makers should read Kafka's "The Castle."</p> <p>Mr. Rigdon, I respectfully urge you to review the accuracy of your burden assessment to the government.</p>	
USCIS	Unrelated Comment Submitted by ZAJI ZAJRADHARA	INVESTIGATE THE CNMI DEPT OF LABOR~!!!!	https://downloads.regulations.gov/USCIS-2025-0006-0003/attachment_1.pdf
USCIS	Unrelated Comment Submitted by cnmi growers association / panopticon group ww	See attached file(s)	https://downloads.regulations.gov/USCIS-2025-0006-0004/attachment_1.pdf
USCIS	Comment Submitted by Edward Summers	Requiring SSNs for relatives and EINs for employers will be unnecessarily burdensome on applicants/petitioners and is unlikely to substantially approve vetting. Individual petitioners are already required to provide a SSN. Employer petitioners are already required to provide an EIN. These are reasonable data collections to help confirm information about the petitioner. Applicants are likewise required to provide a SSN if they have one. Extending this requirement to unrelated parties is unnecessary to the adjudication of petitions and benefits. The SSNs of family members is unlikely to reveal additional information relevant to the applicant's eligibilty for a benefit. Likewise, EINs for unrelated employers is unlikely to impact the adjudication of a petition or application. Providing this information without the permission of the holder of the SSN or EIN is a violation of the third party's privacy rights. It also imposes a substantial burden on the applicant/petitioner to obtain private information from individuals who lack an interest in the matter and with whom the applicant/petitioner may lack any formal or ongoing relationship. This expansion of collection of SSN/EIN data for third parties is therefore unnecessary, unjustified, and overly burdensome and should not be implemented.	
USCIS	Duplicate Comment Submitted by Edward Summers	Requiring SSNs for relatives and EINs for employers will be unnecessarily burdensome on applicants/petitioners and is unlikely to substantially approve vetting. Individual petitioners are already required to provide a SSN. Employer petitioners are already required to provide an EIN. These are reasonable data collections to help confirm information about the petitioner. Applicants are likewise required to provide a SSN if they have one. Extending this requirement to unrelated parties is unnecessary to the adjudication of petitions and benefits. The SSNs of family members is unlikely to reveal additional information relevant to the applicant's eligibilty for a benefit. Likewise, EINs for unrelated employers is unlikely to impact the adjudication of a petition or application. Providing this information without the permission of the holder of the SSN or EIN is a violation of the third party's privacy rights. It also imposes a substantial burden on the applicant/petitioner to obtain private information from individuals who lack an interest in the matter and with whom the applicant/petitioner may lack any formal or ongoing relationship. This expansion of collection of SSN/EIN data for third parties is therefore unnecessary, unjustified, and overly burdensome and should not be implemented.	

USCIS	Comment Submitted by jean publie	24 data elements for foreigners coming into USA. the names of the person's in the business who can verify that this person has indeed been and is an employee at that company. however it is time to stop issuing asylum, refugee applications, and many of these other forms. we should be concentrating in the USA on getting rid of the 20 million foreigners Biden invited into this country when the majority of citizens were clearly opposed to that invitation to foreigners.use of all these forms should b stopped just concentrate on getting rid of the foreigners who came here in thlast 4 years. remove them. don't let more in until we get rid of them. also when we start issuing these forms, put at \$25,000 charge on using them. putting the cost of these foreigners on american citizens whose backs are already broke by high taxation is not appreciated. why should be pay the costs of these form, put at least a \$25,000 fee on use of any of these form. each form \$25,000. make them pay to come here. we are sick of the giveaways. we pay for everything. they get free medical, free educatin, free rent, free food, free telephone, free transport. what the hell is going on in usa	
USCIS	Comment Submitted by Marble Law	<p>The proposed regulation to collect additional biographic and employment information from certain immigration forms may be problematic under the Administrative Procedure Act (APA) and the Paperwork Reduction Act (PRA). It's remarkable how much excess paper-pushing and meaningless work the government expects the applicants, and its own employees, to do here.</p> <p>Potential APA Issues:</p> <p>- Arbitrary and Capricious: The agency's failure to provide a clear rationale for why the existing data collection is insufficient for national security vetting purposes may render the proposed regulation arbitrary and capricious under the APA. Agencies are required to provide a rational basis for their decisions, and the lack of justification may not meet this standard.</p> <p>- Lack of Transparency: The proposed regulation's requirement to collect "all information necessary" for vetting and screening purposes is overly broad and may lead to the collection of irrelevant or unnecessary information, which could undermine public trust and make it difficult for applicants to understand the implications of providing sensitive information.</p> <p>PRA Non-Compliance:</p> <p>- Insufficient Justification: The PRA requires agencies to demonstrate that the collection of information is necessary and that the burden on the public is minimized. The agency's failure to provide sufficient justification for collecting additional data elements may violate the PRA's requirements.</p> <p>- Misuse of Generic Clearance: The agency's attempt to use a generic clearance notice to collect this information may be improper, as generic clearances are typically reserved for low-burden, high-utility collections. Collecting sensitive information, such as employer identification numbers and family member Social Security numbers, doesn't fit neatly into this category.</p> <p>Additional Concerns:</p> <p>- Unnecessary Information Collection: Collecting unnecessary information, such as employer identification numbers and family member Social Security numbers, imposes an undue burden on applicants, particularly for non-discretionary benefits like N-400 (Application for Naturalization) and I-751 (Petition to Remove Conditions on Residence)</p>	
USCIS	Comment Submitted by Project Citizenship	See attached file(s)	https://downloads.regulations.gov/USCIS-2025-0006-0009/attachment_1.pdf

USCIS	Comment Submitted by Melanie Pineda	Collecting this information would be harmful for immigrant communities, slow down already strenuous processing times, and result in an unnecessary overhaul of the immigration process. The collection of family member's social security numbers specifically seems extremely dangerous and useless, given that supposedly social security is already to be sharing information with USCIS on a case-by-case basis. This requirement results in applicants putting their family members and their own children at risk, and could cause issues with privacy law. Any mismarked social security numbers (which would be inevitable, given that applicants/practitioners are human beings and can make mistakes) could also cause confusion both at USCIS's offices as well as social security offices. In fact, in many cases applicants are not even applying for the family members listed in the proposed requirements, meaning this data is essentially being collected for no clear reason. In the time of data breaches and overuse of technology, this puts people who may not even be applying for immigration benefits at risk of having their personal information shared with inaccessible and ambiguous agencies. There is no need for immigration to collect this info in order to properly adjudicate these applications, as proven by the work USCIS has done in years past. This requirement would also make the already lengthy process even more time consuming, stressful, and strenuous on applicants and practitioners. This change seems especially unwarranted given that the social security office is no longer providing new EAD applicants with social security cards, meaning that several applicants who are entitled to a social security number in order to legally work do not even have one, and are not able to get one due to barriers at the social security offices themselves. It would be in USCIS, applicants, and practitioner's best interests to not include these needless, dangerous, harmful, redundant, and exploitative new data collection questions.	
USCIS	Comment Submitted by Iryna Kustorovska	<p>As a Ukrainian currently in the United States under a temporary humanitarian program, I respectfully ask USCIS and DHS to consider creating a legal pathway to permanent residency (Green Card) for Ukrainians who have settled, work, and actively contribute to American society.</p> <p>Many of us fled war, integrated into local communities, found jobs, and built new lives here. Yet our status remains temporary, creating constant uncertainty and fear of losing everything we have built.</p> <p>Beyond working and paying taxes, I also volunteer in my community: I helped sew blankets at a local church, organized a yacht parade to collect donations and toys for children, and volunteered at Easter by buying and packing eggs for kids. Thousands of Ukrainians across the U.S. do similar volunteer work, helping and supporting others.</p> <p>Allowing us to adjust status and apply for a Green Card would help us fully participate in American life, invest in our future, and strengthen the communities and economy of the United States.</p> <p>Thank you very much for considering this request.</p>	
USCIS	Comment Submitted by Catholic Legal Immigration Network, INC	See attached file(s)	https://downloads.regulations.gov/USCIS-2025-0006-0012/attachment_1.pdf
USCIS	Comment Submitted by Merrimack Valley Immigrant & Education Center	See attached file(s)	https://downloads.regulations.gov/USCIS-2025-0006-0013/attachment_1.pdf
USCIS	Comment Submitted by Immigrant Legal Resource Center	Please find attached comment from the Immigrant Legal Resource Center.	https://downloads.regulations.gov/USCIS-2025-0006-0014/attachment_1.pdf
USCIS	Comment Submitted by South Asian Network	South Asian Network (SAN) is a grassroots, community-based organization that has been serving the South Asian community of Southern California for the last 3 decades in the areas of community health, gender-based violence, and civil rights. Our mission is rooted in community empowerment, healthcare access, and culturally specific services. We work with low-income, working-class, and immigrant South Asians, many of whom are navigating complex immigration systems, often while also facing language barriers, discrimination, and trauma from prior displacement. Our legal services team supports hundreds of clients each year in applying for immigration relief. The forms as they already exist are often very confusing for our clients, sometimes even causing them to delay or abandon filing applications they are otherwise eligible for. We have witnessed firsthand how even minor bureaucratic changes can significantly impact the ability of our community, South Asian immigrants, to safely and accurately file immigration applications.	https://downloads.regulations.gov/USCIS-2025-0006-0015/attachment_1.pdf

USCIS	Comment Submitted by Erin Day	<p>I am respectfully submitting this comment in opposition to the proposed collection of six additional data elements across immigration forms. In particular, the proposed collection of the social security number of the applicant’s family members (including parents, children, spouse and siblings) is problematic for many reasons.</p> <p>It does not seem relevant or necessary to collect social security numbers of family members in order to determine eligibility for immigration benefits. At the most fundamental level, an applicant’s family members have no bearing on an applicant and to suggest that familial association is relevant to determining eligibility essentially holds someone accountable for a person that they have no influence over. That is prejudicial, discriminatory and retaliatory, not to mention blatant surveillance in an effort to target individuals for detention and deportation. This essentially forces an applicant to potentially place family members in harm’s way.</p> <p>Moreover, it is an invasion of privacy to insist that an applicant provide the social security number of a third-party, someone who is unable to consent or forced to consent to the sharing of their information, potentially a violation of the Privacy Act of 1974.</p> <p>As others have noted, this also appears to violate the Paperwork Reduction Act by significantly increasing the burden on applicants and government officials processing the information. Inevitably, more data means more good-faith mistakes, the resolution of which is time-consuming, and a wasteful diversion of government resources.</p> <p>This proposed collection of more data is burdensome, an invasion of privacy, and an exploitation of applicants’ good-faith effort. I urge USCIS to withdraw this proposed notice. Thank you for your consideration of these comments.</p>	
USCIS	Comment Submitted by Merrimack Valley Immigrant & Education Center	Comment in Opposition to Agency Information Collection: New Collection; Generic Clearance for the Collection of Certain Biographical and Employment Identifiers OMB Control Number 1615-NEW, DHS, Docket ID USCIS-2025-0006	https://downloads.regulations.gov/USCIS-2025-0006-0017/attachment_1.pdf
USCIS	Comment Submitted by Heather Meyers	See attached file(s)	https://downloads.regulations.gov/USCIS-2025-0006-0018/attachment_1.pdf , https://downloads.regulations.gov/USCIS-2025-0006-0018/attachment_1.docx
USCIS	Comment Submitted by Immigrant Legal Resource Center	Please find attached a second comment from the Immigrant Legal Resource Center. This is in addition to the comment submitted on July 24, 2025.	https://downloads.regulations.gov/USCIS-2025-0006-0019/attachment_1.pdf
USCIS	Comment Submitted by NALEO Educational Fund	Please see attached comment submitted by the Naturalization Working Group and other naturalization service providers, adult educators, advocates and other stakeholders opposing the proposed information collection.	https://downloads.regulations.gov/USCIS-2025-0006-0020/attachment_1.pdf
USCIS	Comment Submitted by C Qolchok	See attached file(s)	https://downloads.regulations.gov/USCIS-2025-0006-0021/attachment_1.pdf