

Comments Regarding Proposed Changes to Form I-485

To: U.S. Citizenship and Immigration Service
Office of Policy and Strategy
Chief, Regulatory Coordination Division
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Please accept these comments in regard to the proposed changes in USCIS Form I-485, published in the Federal Register on March 31, 2016. I am a retired corporate attorney who has been providing pro bono legal services to low-income immigrants for the past 8 years in the offices of a non-profit organization serving Northern Virginia. Most of the clients that I assist in filing Form I-485 are asylees and refugees. For these clients, applying for permanent resident status is a process both exciting and anxiety-invoking. My comments are limited to a few proposed questions for the form that seek irrelevant information and will unnecessarily increase the trepidation of my clients in completing the form.

Form I-485 already has dozens of questions that ask in a variety of ways whether the applicant has engaged in egregious acts. USCIS now proposes to add to that litany of horrors additional acts that are neither egregious nor constitute grounds of inadmissibility. These are proposed Question 16, "Have you EVER worked in the U.S. without authorization?" and Question 25, "Have you EVER used any illegal drugs or abused any legal drugs?" If these questions are adopted, a great many applicants will be obligated to answer "Yes" and then describe their supposed transgressions in supplemental statements. USCIS does not need this information and should not want this information. Applicants will be terrified by these questions, appearing as they will among questions concerning murder, rape, genocide, kidnapping, and acts of sabotage. I sincerely hope that I will not have to help applicants frame their "confessions" in response to these questions.

I am also greatly concerned by proposed Questions 51.a - 51.f. , which seek information regarding the activities of the parents and spouses of applicants. These "guilt by association" questions strike me as jarringly un-American and without legitimate purpose. As with Questions 16 and 25, USCIS does not need and should not want answers to these questions, and applicants should not be compelled to answer them.

Respectfully submitted,

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