

**SUPPORTING STATEMENT FOR
Biographic Information (Registration)
OMB Control No.: 1615-NEW
COLLECTION INSTRUMENT(S): G-325R**

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Section 103(a)(1) of the Immigration and Nationality Act (INA), 8 U.S.C. section 1103(a)(1), gives the Secretary of Homeland Security general authority to enforce and administer the immigration laws. Section 103(a)(3) of the INA, 8 U.S.C. section 1103(a)(3), authorizes issuance of forms, instructions, and guidance necessary to carry out the authority provided in section 103(a)(1) of the INA, 8 U.S.C. section 1103(a)(1).

This emergency action is necessary to allow aliens to comply with the registration and fingerprinting requirements of the INA, 8 U.S.C. 1301, 1302, 1303, 1304, and 1306, and [8 CFR 264.1](#) and to enable the execution of the Executive Office of the President issued Executive Order (EO) 14159, *Protecting the American People Against Invasion* (Jan. 20, 2025), 90 FR 8443 (Jan. 29, 2025). Specifically, Section 7 of the Executive Order, *Identification of Unregistered Illegal Aliens*, directs the Secretary of Homeland Security to take appropriate action to ensure that all unregistered aliens in the United States comply with the statutory registration and fingerprinting requirement and immediately publicize information about the legal obligations associated with registration.

Execution of the EO and compliance with the registration and fingerprinting requirement under the INA and 8 CFR part 264 require USCIS to create a new collection of information, Form G-325R, Biographic Information (Registration), for the purpose of allowing previously unregistered aliens to electronically apply for registration and fingerprinting in the United States. By adding the ability for affected aliens to use the USCIS online account to apply to meet their registration obligations, USCIS should be able to streamline processing efficiencies for this population to enhance security screening and promptly identify threats.

The registration and fingerprinting requirements currently appear in sections 1301-1306 of Title 8 of the United States Code. With limited exceptions, aliens above the age of 14 who remain in the United States for 30 days or longer, must apply for registration and be fingerprinted before the expiration of the 30 days, unless previously registered and fingerprinted under other provisions of immigration law. 8 U.S.C. 1302. Similarly,

parents and guardians must ensure that their children below the age of 14 are registered. 8 U.S.C. 1302(b). Within 30 days of reaching his or her 14th birthday, the alien child must “apply in person for registration and to be fingerprinted.” 8 U.S.C. 1302(b). Implementing regulations can be found at 8 C.F.R. part 264. USCIS uses the electronic version of Form G-325R, Biographic Information (Registration), for the purpose of registration of unregistered aliens present in the United States in accordance with 8 U.S.C. 1302. Based on the information collected as part of the registration, USCIS issues the alien appropriate registration documentation in accordance with 8 U.S.C. 1304 and 8 C.F.R. 264.1(b). The statute requires that the alien must always carry and have in their possession their registration document. *See* 8 U.S.C. 1304(e). Any alien who fails to register or provide notification of a change of address, makes fraudulent statements, or provides counterfeit documents during the registration process is subject to criminal penalties. *See* 8 U.S.C. 1306. DHS may share the information provided by the alien through the Form G-325R with other Federal, state, local and foreign government agencies and other authorized organizations, in accordance with 8 U.S.C. 1304(b).

Any alien may be required to submit biometric information if the regulations or form instructions require such information or if requested in accordance with 8 C.F.R. 103.2(b) (9). DHS may collect and store for present or future use, by electronic or other means, the biometric information submitted by an individual. DHS may use this biometric information to conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws. *See* 8 C.F.R. 103.16; 8 U.S.C. 1103.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

USCIS uses the electronic version of Form G-325R, Biographic Information (Registration), for the purpose of registration of unregistered aliens present in the United States. With limited exceptions, aliens above the age of 14 who remain in the United States for 30 days or longer, must apply for registration and be fingerprinted before the expiration of the 30 days, unless previously registered and fingerprinted under other provisions of immigration law. 8 U.S.C. 1302. Similarly, parents and guardians must ensure that their children below the age of 14 are registered. 8 U.S.C. 1302(b). Within 30 days of reaching his or her 14th birthday, the alien child must “apply in person for registration and to be fingerprinted.” 8 U.S.C. 1302(b)

USCIS also intends to use Form G-325R to collect biometric information from unregistered aliens who are present in the United States for the purpose of registration in accordance with 8 U.S.C. 1302.

3. Describe whether, and to what extent, the collection of information involves the use

of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The process requires a respondent to submit Form G-325R and supporting evidence in response to this collection of information. Form G-325R can only be completed, signed, and submitted electronically via <https://myaccount.uscis.dhs.gov>. A link to this website is available on the USCIS forms page. Respondents who wish to complete and submit G-325R electronically must first create and then sign into their USCIS online account before being able to access the electronic version of the form. The burden for setting up a USCIS online account is covered under the USCIS Online Account Access information collection (OMB control number 1615-0122).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no current collection of information that obtains the information necessary for purposes of the registration and fingerprinting under INA 262 and Form G-325R registration process.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

There is no impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information collection Form G-325R is not approved, unregistered aliens present in the United States will not have a means to register as required by law. See 8 U.S.C. 1302. Also, USCIS will not have the necessary information to issue the appropriate registration documentation under 8 U.S.C. 1304. Pursuant to 8 U.S.C. 1304(e), the alien must carry registration documentation at all times or is subject to criminal penalties. Any alien who fails to register or provide notification of a change of address, makes fraudulent statements, or provides counterfeit documents during the registration process is subject to criminal penalties. See 8 U.S.C. 1306.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection is conducted in a manner consistent with the guidelines in 5 C.F.R. 1320.5(d)(2).

8. **If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 C.F.R. 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

USCIS is seeking emergency approval of the Form G-325R under 5 CFR 1320.13 to comply with the statutory registration requirements and in compliance with Executive Order 14519, *Protecting the American People Against Invasion* (Jan. 20, 2025), 90 FR 8443 (Jan. 29, 2025).

Public comments will be solicited and this information collection request will go through a normal Paperwork Reduction Act (PRA) approval process, including a response to all comments received from the public, no later than six months after the approval of this emergency request.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

USCIS does not provide any payment for benefit sought.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

For purposes of Form G-325R, there is an assurance of confidentiality of registration and fingerprint records provided to respondents pursuant to 8 U.S.C. 1304(b), except for permitted disclosures to pursuant to 8 U.S.C. 1357(f)(2) and such persons and agencies as designated by the Secretary¹.

This collection is covered under the following Privacy Impact Assessment:

- DHS/USCIS/PIA-056(a) USCIS Electronic Immigration System (ELIS), December 03, 2018, updated July 31, 2024; and
- DHS/USCIS/PIA-061 Benefit Request Intake Process, March 15, 2016.

The collection of information is covered by the following System of Records Notices:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556; and
- DHS/USCIS-007 Benefits Information System, October 10, 2019, 84 FR 54622.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

USCIS Form G-325R asks questions of sensitive nature about an alien's police and

¹Registrants who use the Form G-325R also may be entitled to information protections under 8 U.S.C. 1367 if they have otherwise requested or received VAWA/T/U-based benefits. Registrants who use the G-325R to register may also be entitled to confidentiality protections under 8 C.F.R § 208.6.

criminal record, as required by 8 U.S.C. 1304(a)(4).

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

		A	B	C (=AxB)	D	E (=CxD)	F	(=ExF)
Type of Respondent	Form Name / Form Number	#. of Respondents	#. of Responses per Respondent	# of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
Individuals or households	G-325R Online**	1,400,000	1	1,400,000	0.67	938,000	\$45.96	\$43,110,480
Individuals or households	Biometric Services	1,400,000	1	1,400,000	1.17	1,638,000	\$45.96	\$75,282,480
Total				2,800,000		2,576,000		\$118,392,960

* The above Average Hourly Wage Rate is the [May 2023 Bureau of Labor Statistics](#) average wage for All Occupations of \$31.48 times the wage rate benefit multiplier of 1.46 (to account for benefits provided) equaling \$45.96. The selection of “All Occupations” was chosen because respondents to this collection could be expected from any occupation.

** This is an annual estimate, there could be a higher number of filings in Year 1 vs Years 2 and 3, as the information collection launches and individuals register immediately to be in compliance. All G-325R

respondents will be required to attend a Biometric Service Appointment.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
 - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
 - **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995; (2) to achieve regulatory compliance with requirements not associated with the information collection; (3) for reasons other than to provide information or keep records for the government; or, (4) as part of customary and usual business or private practices.**

There is not an estimated total annual cost burden to respondents submitting Form G-325R due to being electronically submitted.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The estimated cost to the Government is **\$71,960,000**. This figure is calculated by multiplying the estimated number of respondents (1,400,000) by the time required to

adjudicate the form (0.5 hours), which is multiplied by the average hourly rate of USCIS adjudicators (\$42.80) for a total of \$29,960,000 plus the estimated number of respondents who are estimated to need biometrics (1,400,000) multiplied by the biometric services fee (\$30.00) for a total of \$42,000,000.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

On January 20, 2025, the President issued Executive Order (EO) 14159, *Protecting the American People Against Invasion*, 90 FR 8443 (Jan. 29, 2025). Specifically, Section 7 of the Executive Order, *Identification of Unregistered Illegal Aliens*, directs the Secretary of Homeland Security to take appropriate action to ensure that all unregistered aliens in the United States comply with the statutory registration and fingerprinting requirement and to immediately publicize information about the legal obligations associated with registration. Execution of the EO and compliance with the registration and fingerprinting requirement under the INA and 8 CFR part 264 requires USCIS to create a new collection of information, Form G-325R, Biographic Information (Registration), for the purpose of allowing previously unregistered aliens to electronically apply for registration and fingerprinting in the United States.

This is a new information collection and there are no program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

USCIS will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

USCIS does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved with this collection.