

## Form I-590-013 Extension - Responses to 30-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2007-0036](#)

30-day FRN Citation (federalregister.gov): [90 FR 21325](#)

Publish Dates: May 19, 2025 – June 18, 2025

Comment #	Commenter ID	Comment	USCIS Response
1.		<b>Commenter: CPAC Foundation Center for Regulatory Freedom</b>	
	<a href="#">0074</a>	<p>CRF opposes the renewal of Form I-590 and instead recommends that USCIS conduct an emergency revision of the form, as well as all related rules, regulations, guidance, and policies related to its use and implementation. CRF urges USCIS to take advantage of the current suspension of USRAP and amend criteria for refugee status determinations to deter further abuse and fraud within the immigration system.</p> <p><b>Recommendations:</b> Because Executive Order 14163 has indefinitely suspended USRAP, USCIS now has an opportunity to revise current regulations and policy guidance overseeing administration of the program and approvals of refugee status. USCIS should act swiftly in tightening agency rules and guidelines to mirror the criteria reflected in landmark case law, mainly the four-part test outlined in <i>Mogharrabi</i>. Rather than referring to individual instances of court determinations, USCIS should rely on legal precedents that have entrenched themselves in immigration proceedings for decades, particularly those reflecting the intentions and sentiments of concrete legislation, such as the INA. Form I-590 should be revised immediately to increase the burden of proof required to demonstrate a genuine fear of persecution. The administrative burden associated with refugee applications should also be increased to de-incentivize fraudulent attempts to claim refugee status as a faster means of entry.</p> <p>As of March 2025, there are an estimated 18.6 million illegal aliens residing in the United States, despite massive deportation</p>	<p><b>Response:</b> This extension action is to keep the form approved for use under the Paperwork Reduction Act.</p>

## Form I-590-013 Extension - Responses to 30-day FRN Public Comments

**Public Comments** (regulations.gov): [USCIS-2007-0036](#)

**30-day FRN Citation** (federalregister.gov): [90 FR 21325](#)

**Publish Dates:** May 19, 2025 – June 18, 2025

		<p>efforts and an increased presence of law enforcement at the southern border. This unmanageable influx of illegal aliens into the United States over the last four years demands that America's national security concerns be prioritized over the issuance of humanitarian aid. If refugee admissions continue to be conducted according to the lowest possible threshold for what constitutes a well-founded fear of persecution, the nation's immigration system will continue to be infiltrated by those seeking to take advantage of a more lenient pathway into the country. USCIS should narrow the current path to obtain refugee status until the present illegal immigration problem is under control.</p> <p>See attachment in Comment ID 0074 for additional details.</p>	
<b>2.</b>		<b>Commenter: Anonymous</b>	
	<a href="#">0075</a>	<p>This collection needs immediate attention for termination based on regulatory violations of authority. The agency that originated this contract is not associated with rule making. The excessive taxpayer burden for this agreement is a result of improper implementation of unlawful contracts. Since 2003 this contract has been in place and has multiple violations of the law and is subject to additional legal impact from this agreement currently in place.</p>	<p><b>Response:</b> This extension action is to keep the form approved for use under the Paperwork Reduction Act.</p>