

Form G-325R-002 Revision - Responses to 30-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2025-0005](https://www.regulations.gov/document/USCIS-2025-0005)

30-day FRN Citation (federalregister.gov): [90 FR 38655](https://www.federalregister.gov/documents/2025/08/09/90-fr-38655)

Publish Dates: August 11, 2025 – September 10, 2025

Comment ID	Comment Sub-Theme	Comment Summary	USCIS Response
Topic 1. Compliance with the PRA			
0006	Burden and Efficiency	<p>The commenter expressed that the proposed revision should aim to reduce redundancy across immigration forms. Applicants often repeat the same biographic data on multiple documents. Streamlining this process, perhaps through a centralized digital profile, would reduce administrative burden and improve efficiency for both applicants and USCIS staff.</p>	<p>Response: No additional changes were made based on this comment. The Form G-325R is limited in scope to provide a general registration option for unregistered aliens regardless of immigration status and collect the information required for alien registration under section 264(a) of the INA, 8 U.S.C 1304(a), including questions on an alien’s date and place of entry of the alien into the United States; activities in which he has been and intends to be engaged; length of time he expects to remain in the United States; police and criminal record, if applicable; and additional matters as may be prescribed by the Secretary. Also, the biographic information collected on Form G-325R is used to verify the identity of the registering alien, which is similar to other applications and petitions that require the collection of biographic information by USCIS.</p> <p>Regarding streamlining the process, Form G-325R is available for online submission through a USCIS Online Account. Overall, the time burden for completion of a form electronically is estimated to take less time than completion of a paper form due to the electronic submission providing a more streamlined process for the respondent to complete and submit the form and for USCIS intake and processing of the information collection.</p> <p>DHS strives to continue streamlining the online process by which unregistered aliens may register and comply with the law as required by the INA. In addition to the information collection actions to publicize information on the alien registration requirement, USCIS established a dedicated website with information on the Alien Registration Requirement (ARR) and an ARR Determination Tool that may help aliens determine whether they must register.</p>

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<p>0014</p>	<p>Public Comment Period</p>	<p>The commenter requests that the agency restart the Paperwork Reduction Act (PRA) approval process with a new 60-day public comment period for form G-325R due to significant and burdensome changes made between the initial 60-day comment period and the subsequent 30-day comment period. They argue that the shortened timeframe does not provide sufficient notice or opportunity for stakeholders, including their organization (CLINIC), to evaluate the changes and provide feedback on the burdens imposed. The commenter emphasizes the need for adequate time to gather input from their network and fully address concerns, urging DHS be required to issue a new 60-day comment period to ensure stakeholders are informed and can respond appropriately.</p>	<p>Response: The agency has fully complied with the Paperwork Reduction Act (PRA) clearance procedures, as required under the PRA 44 U.S.C. 3501 <i>et seq.</i> and its implementing regulations at 5 CFR part 1320. On March 12, 2025, USCIS published a 60-day Federal Register Notice (FRN) for this information collection to consult with the public. The public comment period was open until May 12, 2025. <i>See</i> 90 FR 11793 (Mar. 12, 2025). In response to this request, the public submitted suggested changes, some of which could be adopted by USCIS as enhancing the quality, utility, and clarity of the information collected as relating to the registration process pursuant to INA 262 and INA 264. <i>See</i> G-325R 60-day Public Comment Response Matrix for the 60-day notice. These changes were presented to the public as part of the 30-day FRN for public comments. Therefore, the timeframe was neither shortened nor inadequate, under existing PRA procedures, to provide comments and input. For this reason, USCIS respectfully declines to re-post the Form G-325R for another 60-day comment period, but will, as part of the regular, future Form G-325R revision process reopen the form for public comments in accordance with the PRA.</p>
<p>Topic 2. Privacy and Data Protection</p>			
<p>0006</p>		<p>The commenter expressed that biographic information is deeply personal and often includes sensitive details about family members, migration history, and legal status. The commenter encourages USCIS to clearly outline how this data will be stored, protected, and used. Transparency in data handling is essential to building trust, especially among communities that have experienced surveillance or discrimination.</p>	<p>Response: The information collected on a Form G-325R is relevant to the registration and supports the collection of information as required by section 264(a) of the INA, 8 U.S.C. 1304(a), including questions on an alien’s date and place of entry of the alien into the United States; activities in which he has been and intends to be engaged; length of time he or she expects to remain in the United States; police and criminal record, if applicable; and additional matters as may be prescribed by the Secretary.</p> <p>USCIS takes data protection seriously and uses, safeguards, and shares information entrusted to us by members of the public in accordance with stringent Federal standards, policies, and</p>

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			<p>procedures. USCIS needs the individual’s biographic information to verify the identity of the requestor.</p> <p>USCIS leverages multiple Privacy Act SORNs to provide privacy coverage for G-325R data. Specifically, DHS/USCIS/ICE/CBP-001 Alien File, Index and National File Tracking System of Records, covers the physical and electronic immigration files, including A-Files and Receipt Files. DHS/USCIS-007, Benefits Information System, covers the collection, use, and storage of data elements USCIS collects about benefit requestors, beneficiaries, legal representatives, interpreters, and preparers. DHS/USCIS-018, Immigration Biometric covers background checks and vetting conducted on benefit requestors.</p> <p>USCIS did not create a new system or procedures for processing Form G-325R data. USCIS uses its myUSCIS public web portal to intake Form G-325R. MyUSCIS is the conduit used to populate additional source systems associated with the particular benefit requested. These systems operate within the scope of Federal information management and security guidelines and procedures, such as the Federal Information Security Modernization Act (FISMA).¹ Information regarding myUSCIS and its protections can be found at https://www.dhs.gov/publication/dhsuscispia-064-myuscis.</p> <p>DHS notes that the information collected by USCIS through Form G-325R is stored in ELIS, and that USCIS’ partners at CBP and ICE have long had read-only access to USCIS systems, including but not limited to ELIS.</p>
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¹ This is a United States Federal law that outlines a framework for protecting government information, operations, and assets against both natural and man-made threats. It requires Federal agencies to develop and implement information security programs, adhering to guidelines set by the FISMA was originally part of the E-Government Act of 2002 and has been further amended by the Federal Information Security Modernization Act of 2014.

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Topic 3. Accessibility and Vulnerable Populations			
0006 0014	Accessibility	<p>Commenters highlight several concerns regarding accessibility and the impact of the proposed Form G-325R and associated requirements on vulnerable populations. Below is a summary of the key points:</p> <p>1. Language and Accessibility Barriers: Immigrants often face language barriers, which complicates completing forms. Recommendations include making the form available in multiple languages, using plain and culturally sensitive language, and ensuring equitable access.</p> <p>2. Language Barriers: Vulnerable populations, including immigrants and refugees, often face challenges due to limited English proficiency, making it difficult to complete the form and comply with requirements.</p>	<p>Response: Please see responses below.</p> <p>DHS notes that USCIS’ immigration forms are offered and must be submitted in English.² An alien may use the assistance of an interpreter for reading the instructions and questions on the new registration form. If the alien uses an interpreter, he or she must provide the contact information of that interpreter and upload the interpreter’s certification and signature page when applying for registration.</p> <p>DHS notes that many aliens who are present in the United States have already fulfilled their duty to register through a variety of pathways identified in 8 CFR 264.1. An alien who was issued an immigrant or nonimmigrant visa prior to his or her most recent arrival and was admitted into the United States using that visa is registered. <i>See</i> INA sec. 221(b), 8 U.S.C. 1201(b). An alien who has been issued one of the documents designated as evidence of registration under 8 CFR 264.1(b) has already registered, and an alien who has submitted one of the forms designated at 8 CFR 264.1(a) and provided fingerprints (unless waived), but was not issued one of the evidence of registration designated at 8 CFR 264.1(b), has complied with the registration requirement of section 262 of the INA, 8 U.S.C. 1302. If an alien does not have any other pathway to register and to be fingerprinted, the alien may file the Form G-325R to comply with their duty under section 262 of the INA, 8 U.S.C. 1302. Aliens who are registered</p>

² The exception to this general rule is the Form I-9, Employment Eligibility Verification, which is offered in the Spanish language. See USCIS, Form I-9, “I-9, Employment Eligibility Verification,” <https://www.uscis.gov/i-9> (last updated Apr. 2, 2025). USCIS also has a Multilingual Resource Center, <https://www.uscis.gov/tools/multilingualresource-center>, and a website in Spanish, <https://www.uscis.gov/es/herramientas/centro-de-recursos-multilingues>. USCIS strives to include as much information as possible on these websites.

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		<p>3. Documentation Requirements: Requirement to upload passports, government-issued IDs, or written explanations disproportionately burdens minority and low-income communities who may lack access to reliable technology, have limited English or written proficiency, and face challenges in meeting the requirements, increasing the risk of noncompliance.</p> <p>4. Digital Divide: Requiring the form to be completed online excludes individuals who lack computer literacy, reliable internet access, or the necessary technology, creating additional barriers to compliance.</p>	<p>and reached 14 years old may use the new form to register if they have no other pathway to satisfy this requirement.</p> <p>USCIS requires aliens attempting to register to upload either passport or government-issued identity document for identity verification purposes, similar to other applications and petitions that require these documents by USCIS. Regarding the uploading of written explanations, the alien may provide additional evidence or documents to help explain any responses on Form G-325R. DHS notes that an alien may seek the assistance of a preparer. If the alien uses a preparer, he or she must provide the contact information of that preparer and upload the preparer’s certification and signature page when applying for registration.</p> <p>USCIS has considered providing a paper-based version; however, electronic processing of the registration information collection is extremely beneficial for registrants and USCIS. First, in the electronic requirement, and unlike in the paper environment, information submitted through the electronic process is easily readable and the registrant is prompted to provide the necessary information ensuring that the registration is complete. In the paper environment, a registrant may omit mandatory information, which would require USCIS to follow up with aliens or for USCIS to be unable to process the form, resulting in aliens’ failure to register as required.</p> <p>Additionally, for requests submitted online, the case processing occurs digitally. USCIS’ electronic systems automatically receive the online form and any uploaded supporting evidence that proceeds electronically through each step of the registration process. This allows aliens to obtain evidence of registration almost instantly after applying for registration or after providing biometrics, if required, including in digital format, which is significant in light of the requirement in section 264(e) of the INA, 8 U.S.C. 1304(e), for aliens to carry evidence of registration.</p>
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			<p>Paper forms require manual intake processing at a facility, including opening the envelopes of a mailed submission, checking forms against acceptance criteria, and scanning the documents to convert them into electronic format or otherwise entering form responses into USCIS systems. Storing and moving costs render the process more costly. Manual intake processes are prone to mistakes, are more time-consuming and burdensome for the agency and the alien, and may lead to delays in processing and data integrity issues. Online access provides enhanced security, speed of data ingestion, identity management, and data integrity. E-processing has the potential to provide for the development of enhanced digital and automated services, including fraud detection and national security analysis. Online-only processes thus have significant efficiencies over paper processes.</p> <p>DHS is aware that certain populations may not have ready access to internet technologies. However, DHS believes that a significant number of aliens who are required to register have already been registered either through the visa process under section 221 of the INA, 8 U.S.C. 1201(b) or through other encounters with the government. <i>See</i> 8 CFR 264.1(a) and (b).</p> <p>Additionally, as the use of technology has become increasingly widespread, DHS believes accessibility and internet usage as well as digital literacy has continuously increased over the years.³ DHS believes that the affected population is able to comply with the online filing requirement. For individuals who do not have a personal computer or a smart phone, there are many public facilities across the country, such as public libraries, that provide patrons with free on-line access to computers.</p>
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³ For example, see Federal Communication Commission, “Internet Access Services: Status as of December 31, 2023,” (Sept. 2024), <https://docs.fcc.gov/public/attachments/DOC-405488A1.pdf>.

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			<p>Moreover, nearly all libraries assist patrons with using digital platforms and completing government forms. In fact, libraries are important public resources for internet access and digital literacy. In 2014, there were 9,070 public libraries in the United States.⁴ The Digital Inclusion Survey 2014-2015 found that 98 percent of libraries in the United States at that time offered free Wi-Fi and technology training. Perhaps more significantly, it reported that nearly all libraries offered assistance in completing online government forms.⁵ Therefore, DHS expects that those individuals who do not have personal access to the internet will be, at a minimum, able to create and access their USCIS online accounts at local libraries. Libraries also provide the advantage of knowledgeable librarians who can assist if filers are confused by any aspects of the technology. DHS notes that USCIS ASCs are located throughout the United States with at least one center located in each State, as well as the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands.</p> <p>Congress has supported and mandated the increased utilization of the internet and technology in government administration, and the delivery of a customized digital experience, such as through the Government Paperwork Elimination Act, Pub. L. 105-277 (Oct. 21, 1998), and the E-Government Act of 2002, Pub. L. 107-347 (Dec. 17, 2002), and the 21 Century Integrated Digital Experience Act, Pub. L. 115-336 (Dec. 20, 2018). In an effort to move to digitalization, DHS has, in 2011, also updated regulations in various places, including 8 CFR 1.2 to incorporate</p>
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⁴ U.S. Department of Education, “Digest of Education Statistics: 2016,” Ch. 7 (Feb. 2018), https://nces.ed.gov/programs/digest/d16/ch_7.asp. For 2020 figures, the number of libraries in the United States was reported at 9,025. See U.S. Department of Education, “Number of public libraries, number of books and serial volumes, and per capita usage of selected library services per year, by state or jurisdiction: Fiscal years 2019 and 2020,” Digest of Education Statistics (June 2023), https://nces.ed.gov/programs/digest/d22/tables/dt22_701.60.asp

⁵ Kathy Rosa ed., American Library Association, “The States of America’s Libraries 2015” at 10-11 (Apr. 2015), http://www.ala.org/news/sites/ala.org.news/files/content/0415_StateAmLib_0.pdf.

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		<p>5. Financial Strain: The form and associated costs (e.g., application fee, biometric fees, legal fees, travel, and work limitations) create a significant financial strain on low-income immigrant populations. These burdens may force individuals to choose between compliance and meeting basic needs like housing, food, or medical care.</p>	<p>submission in electronic format. <i>See</i> 76 FR 53763 (Aug. 29, 2011). USCIS only accepts the electronic registrations for the H-1B selection lottery process and online requests from sponsors who complete the Form I-134A, Online Request to be a Supporter and Declaration of Financial Support. <i>See</i> 84 FR 888 (Jan. 31, 2019) and 88 FR 23451 (Apr. 17, 2023). For over a decade, the Department of State (“State”) has also required the online filing of nonimmigrant and immigrant visa applications, which constitutes the alien’s registration for the purposes of section.⁶ State is also conducting the Diversity Visa Lottery on an online basis only.</p> <p>For these reasons, DHS has determined that the governmental and public benefits outweigh any difficulties that a small segment of the affected public may encounter as a result of DHS not providing a paper version of the form. DHS believes that any potential difficulties individuals may experience with filing electronically can be overcome through the use of public services, as described previously. DHS notes that USCIS provides online and technical support for USCIS online accounts, including technical assistance with setting up an online account, problems logging into an online account, and difficulties uploading documents.⁷</p> <p>INA 262, the statute established by Congress, requires aliens who remain in the United States for 30 days or longer to apply for registration and to be fingerprinted, and Form G-325R has not changed, modified, or expanded on the alien registration requirements. The Form G-325R provides a general registration option for unregistered aliens, regardless of immigration status, to improve registration outcomes. The information collected on the form is required for alien registration under section 264(a) of</p>
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⁶ *See* 22 CFR 41.103(a)(1) amended by 73 FR 23067 (Apr. 29, 2008) and 42.63(a)(1) amended by 75 FR 45475 (Aug. 3, 2010).

⁷ *See* USCIS, “Online Account and Technical Support,” <https://www.uscis.gov/tools/uscis-tools-andresources/online-account-and-technical-support> (last updated Oct. 28, 2024).

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		<p>6. Chilling Effect on Vulnerable Populations: The proposed requirements may discourage vulnerable immigrant populations, such as survivors of domestic violence and those with limited English proficiency, from accessing essential services, reporting crimes, or engaging with schools and healthcare providers.</p> <p>7. Economic and Social Costs: The proposed changes imposes significant hardships on populations least able to bear them, without delivering meaningful benefits to public safety or national security.</p> <p>8. Trauma-Informed Design: Many applicants may have experienced trauma, such as displacement or persecution. Recommendations include adopting a trauma-informed design by consulting professionals to ensure the form avoids retraumatizing applicants, allowing non-essential questions to be skipped, and providing clear context for why certain information is required.</p>	<p>the INA, 8 U.S.C 1304(a) and the biographic information collected on Form G-325R is used to verify the identity of the registering alien, which is similar to other applications and petitions that require collection of information by USCIS. Form G-325R has not changed or modified any procedures related to aliens who are eligible for and recipients of victim-based immigration relief.</p> <p>In the interest of minimizing barriers that might hinder an alien’s ability to meet the requirements of the statute, DHS is not charging any registration fee or biometrics fee. There is also no connection, direct or indirect, between registration and government services, schools, healthcare providers, and the reporting of crimes.</p>
<p>Topic 4. Public Engagement</p>			
<p>0006</p>		<p>This commenter encourages USCIS to continue engaging directly with immigrant-serving organizations, legal aid providers, and community leaders during the revision process. These stakeholders offer invaluable insight into the lived experiences of applicants and can help shape a form that is both legally sound and human-centered.</p>	<p>Response: USCIS appreciates the suggestion. As part of the Paperwork Reduction Act clearance procedures, USCIS is required to seek the input from the public for 60- and 30 days pursuant to 44 U.S.C. 3506 and 3507, in order to gain valuable insight from the public. USCIS has done so as part of the Paperwork Reduction Act clearance procedures for this information collection</p> <p>The information collected on the form is required for aliens subject to registration under sections 262 of the INA, pursuant to 264(a) of the INA, 8 U.S.C 1304(a) and the biographic information collected on Form G-325R is used to verify the identity of the registering alien, which is similar to other applications and petitions that require collection of information by USCIS. The form icollects the information required for aliens</p>

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			to comply with their statutory obligation to register and to maintain a uniform baseline for screening and vetting.
Topic 5. Government Oversight and Surveillance			
0014		<p>The commenter raises concerns about the alien registration requirement, arguing that it infringes on privacy, civil liberties, and risks discriminatory enforcement. They contend that extensive data collection and surveillance of noncitizens could lead to profiling, stigmatization, and fear within immigrant communities, deterring participation in essential activities like seeking medical care or reporting crimes. The revised form demands detailed biographical, family, and personal information, including data on spouses, children, parents, ex-spouses, Social Security Numbers, address history, and full criminal history (even expunged records). The commenter asserts that this overbroad data collection lacks justification, functions as a surveillance tool, and intimidates immigrant communities. They also express concern over the sharing of collected data across DHS and other government entities, which they believe increases the risk of misuse, deepens distrust, and exacerbates fear among immigrants.</p>	<p>Response: The information collected on a Form G-325R is relevant to the registration requirement under INA 262 and is required to be collected by section 264(a) of the INA, 8 U.S.C. 1304(a), including questions on an alien’s date and place of entry of the alien into the United States; activities in which he has been and intends to be engaged; length of time he expects to remain in the United States; police and criminal record, if applicable; and additional matters as may be prescribed by the Secretary. See section 264(a) of the INA, 8 U.S.C. 1304(a). The biographic information collected on Form G-325R is used to verify the identity of the registering alien, which is similar to other applications and petitions that require the collection of information by USCIS.</p> <p>The Form G-325R did not change DHS practices related to maintenance, collection, and use of the information collected from aliens, including alien registration information. The information collected by USCIS through Form G-325R is stored in ELIS, and USCIS’ partners at CBP and ICE have long had read-only access to USCIS systems, including but not limited to ELIS.</p> <p>While the commenter expresses concerns about the enforcement of the registration requirement, “DHS notes that it is charged with the faithful execution of the laws established by Congress. Congress created the alien registration requirement and codified the requirement in INA 262. Congress also required DHS to collect the information contained on Form G-325R, pursuant to INA 264.</p>

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Topic 6. Out of Scope			
0007		There were seven (7) comments received that are out of scope for the proposed revision of this information collection.	Response: These comments are out of scope for the proposed revision of this information collection because they do not provide feedback on the nature of the information collection, the categories of respondents, the estimated burden (i.e. the time, effort, and resources used by the respondents to respond), the estimated cost to the respondent, or the actual information collection instrument.
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