

Form G-28-012 Revision - Responses to 60-day FRN Public Comments

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Comment ID	Comment Sub-Theme	Comment Summary	USCIS Response
Topic 1. Designated Paralegal			
0320 0321 0324		<p>The Catholic Legal Immigration Network, Inc. (CLINIC) and the American Immigration Lawyers Association (AILA) both advocate for USCIS to revise Form G-28 to allow legal representatives to designate paralegals or support staff for limited, supervised communication with USCIS on behalf of consenting clients. This change would align with standard legal practices, improve efficiency, reduce administrative burdens, and enhance access to legal services for immigration applicants. Key points are as follows:</p> <p>1. Need for Paralegal Representation:</p> <ul style="list-style-type: none"> ▪ Both CLINIC and AILA emphasize that legal practitioners rely on paralegals and support staff for routine administrative tasks, such as uploading files, reviewing case information, and engaging in basic communication with agencies. The inability to delegate these tasks is inefficient and inconsistent with practices in other legal fields. ▪ Paralegals meet the criteria for "reputable individuals" under 8 CFR § 292.1(a)(3) as they act under attorney supervision, receive no direct remuneration from clients, and have a pre-existing professional relationship through their employment. <p>2. Benefits of Allowing Paralegal Representation:</p> <ul style="list-style-type: none"> ▪ Permitting paralegals to handle administrative tasks (e.g., case inquiries, appointment scheduling, address changes) would reduce costs for clients, improve efficiency, and ease burdens on USCIS. ▪ Legal service providers could maximize their capacity to assist clients while reducing demand on USCIS customer service channels. ▪ Streamlined processes would benefit all stakeholders, including USCIS, legal representatives, and applicants. 	<p>Response: Regulations at 8 CFR 292.1 governing who can provide representation before USCIS do not include paralegals. We decline to expand the role of paralegals at this time.</p>

		<p>Recommendations:</p> <p>1. Restore Language Permitting Paralegal Representation: USCIS should reinstate provisions allowing paralegals to engage in limited, supervised interactions with the agency, consistent with regulatory authority and sound public policy. Paralegals meet the criteria for "reputable individuals" under 8 CFR § 292.1(a)(3) and should be permitted to handle limited tasks with client consent.</p> <p>2. Increased Efficiency and Capacity: Delegating administrative tasks to paralegals would maximize the capacity of legal service providers, reduce costs for clients, and lessen the demand on USCIS resources.</p> <p>3. Implement Safeguards: To prevent unauthorized practice of law, safeguards such as dual signatures on paralegal designations, restricting the scope of paralegal interactions, and DHS discretion to revoke designations in cases of abuse or misconduct should be adopted.</p> <p>4. Formalize Approval Process: USCIS should create a formal procedure for DHS to approve limited paralegal representation, using Form G-28 as the mechanism for such designations.</p> <p>5. Form Recommendation: Allow paralegals listed to contact USCIS for status updates. Listing one or more, or allowing for a firm roster to be submitted/maintained online would be very beneficial.</p> <p>Conclusion: The commenters strongly urge USCIS to reconsider its proposed revisions to Form G-28 and allow legal representatives to designate paralegals for limited communication tasks. This change would promote efficiency, reduce administrative burdens, lower costs for clients, and improve access to legal services without compromising safeguards against unauthorized practice of law.</p>	
Topic 2. Signature			
0320 0321 0324	Electronic Signature	<p>The commenters emphasized the need for USCIS to modernize its processes by accepting electronic signatures and highlight concerns about the proposed changes to Form G-28 instructions regarding signature requirements. Both organizations argue that the current and proposed policies impose unnecessary burdens,</p>	<p>Response: Please see USCIS' responses below.</p> <ul style="list-style-type: none"> • USCIS forms filed online may be signed electronically when filing online through a USCIS online account.

create confusion, and fail to align with federal laws and best practices. Key points are as follows:

1. Support for Electronic Signatures:

- The commenters advocate for USCIS to accept electronic signatures alongside manual (wet-ink) signatures to improve flexibility and efficiency, reduce administrative burdens, and align with modern practices in banking, healthcare, and other government agencies.
- Federal laws, such as the *Electronic Signatures in Global and National Commerce Act (2000)* and the *21st Century Integrated Digital Experience Act (2018)*, encourage the use of electronic signatures. DHS guidance also supports reducing reliance on manual processes.

2. Benefits of Electronic Signatures:

- **Increased Access:** Electronic signatures would make it easier for individuals in rural areas or with limited access to printers and scanners to access legal services, especially those served by charitable organizations.
- **Efficiency:** Allowing electronic signatures would streamline processes for both applicants and USCIS, reducing processing time and costs.
- **Consistency:** Accepting electronic signatures for all filing methods would align with USCIS's online filing options and federal standards.

3. Concerns About New Rejection Grounds:

- AILA criticizes the proposed rejection grounds for photocopied wet-ink signatures as ambiguous, overly restrictive, and inconsistent with the USCIS Policy Manual.
- The new rejection ground prohibits certain reproduction methods (e.g., photocopying or scanning) but fails to clarify key terms, such as what constitutes an "original document" when multiple parties must sign on the same page.
- AILA describes the language as vague and confusing, creating unnecessary barriers for compliant stakeholders.

4. Failure to Align with Federal Standards:

- USCIS also accepts copies, scans and faxes of the original signed benefit request. A requestor must sign their request before USCIS can accept the filing. A typed signature or copy of a signature that was affixed to another document and copied to the request is not a valid signature for filing purposes as required by 8 CFR 103.2(a)(2).
- The USCIS Policy Manual allows officers to accept copies of signed requests but does not allow a copied or typed signature to be affixed to a request in lieu of signing.
- 8 CFR 103.2(b)(5) provides that USCIS may request a copy of the original signed request, which cannot be provided if a signature is electronically pasted on the request.

		<ul style="list-style-type: none"> ▪ Proposed changes disregard existing federal laws and DHS directives encouraging the adoption of electronic signatures to reduce public burden hours. <p>Recommendations:</p> <p>1. Adopt Electronic Signatures:</p> <ul style="list-style-type: none"> ▪ USCIS should allow electronic signatures for all filing methods, including paper forms, to enhance flexibility, efficiency, and access to counsel. ▪ Develop a process to "marry" online signature certifications with paper filings to facilitate hybrid submissions. <p>2. Withdraw New Rejection Grounds: USCIS should remove the proposed rejection grounds for photocopied wet-ink signatures, which create unnecessary confusion and burden.</p> <p>3. Ensure Clarity and Consistency:</p> <ul style="list-style-type: none"> ▪ Revise the Form G-28 instructions to eliminate vague and contradictory language regarding signature validity and reproduction methods. ▪ Align signature policies with the USCIS Policy Manual and DHS electronic signature guidance to ensure consistency and reduce stakeholder confusion. 	
0320 0321	Family Signature	<p>AILA requests clarification from USCIS regarding the validity of signatures made by family members on behalf of applicants under the age of 14. The instructions for Form G-28 contain conflicting language:</p> <ul style="list-style-type: none"> • Under the "Signature" Section: It states that a parent or legal guardian may sign on behalf of applicants under 14 years of age. • Under the "Validity of Signatures" Section: It states that USCIS will not accept signatures by family members signing for the requestor, which contradicts the provision for applicants under 14. <p>AILA recommends that USCIS resolve this inconsistency by modifying the instructions to the following effect: <i>"Signature by an attorney, or family member, unless the client is under the age of 14, signing for the requestor."</i></p>	<p>Response: The proposed form instructions comply fully with 8 CFR 103.2(a)(2) which provides the following:</p> <ul style="list-style-type: none"> • A parent or guardian may sign for their child under the age of 14 years. • Another relative may <i>not</i> sign for a child. • A child age 14 or older who is not under guardianship must sign their own request. • An attorney may not sign a request for a requestor.

		<p>This clarification would align the instructions with 8 C.F.R. § 103.2(a)(2), which permits family members to sign on behalf of applicants under 14 years of age.</p>	
<p>Topic 3. Withdrawal of Form G-28</p>			
<p>0321</p>		<p>AILA acknowledges USCIS’s effort to clarify the process for withdrawing a Form G-28 but raises concerns about potential misinterpretations and unintended consequences. Key points and recommendations are as follows:</p> <p>1. Clarify Withdrawal Process:</p> <ul style="list-style-type: none"> ▪ AILA recommends that only a new Form G-28 submitted by the primary attorney or accredited representative of record should withdraw a prior Form G-28. ▪ Forms G-28 submitted by law students, law graduates, or for limited-purpose representation should not displace the primary attorney or accredited representative, as these roles are supervisory or limited in scope. <p>2. Prevent Unintended Loss of Representation:</p> <ul style="list-style-type: none"> ▪ AILA suggests adding an option to mark “concurrent representation” or “limited representation” on Form G-28 to prevent inadvertent displacement of the primary attorney or accredited representative. ▪ USCIS should notify the primary attorney of any withdrawal or change to ensure continuity of representation. <p>3. Allow Multiple Attorneys on a Single Form G-28:</p> <ul style="list-style-type: none"> ▪ AILA recommends reinstating the historic practice of permitting multiple attorneys from the same law firm to appear on a single Form G-28. Extend this option to paralegals from the same law firm to streamline adjudications and reduce unnecessary correspondence, as well. 	<p>Response: Please see USCIS’ responses below.</p> <p>1. Clarify Withdrawal Process:</p> <ul style="list-style-type: none"> ▪ Benefit requestors are not required to have legal representation. Therefore, benefit requestors need to have the option to submit a written request to withdraw their representative without having to submit a Form G-28 for a new representative. USCIS declines to make changes in response to this comment. ▪ This comment is already addressed in the form instructions, which indicate that USCIS will not accept a request for withdrawal from a law student, law graduate, or paralegal. No changes made as a result of this comment. <p>2. Prevent Unintended Loss of Representation:</p> <ul style="list-style-type: none"> ▪ Part 2 Item 3 has the option to indicate if the person is appearing for a limited purpose. Decline to make edits as the form already has the recommended option. ▪ USCIS notification procedures would not be addressed in the form; they would be addressed in procedural or policy guidance for officers. USCIS therefore declines to make changes in response to this comment. <p>3. Allow Multiple Attorneys on a Single Form G-28:</p> <p>We decline to the suggestion to allow more than one attorney per Form G-28. Regulations at 8 CFR 103.2(a)(3) provide that a requestor may be represented by an attorney or accredited representative in the United States. That regulation does not provide for multiple attorneys or accredited representatives to simultaneously represent the requestor on the same issue.</p>

		<ul style="list-style-type: none"> ▪ This change would streamline adjudications, reduce public burden hours, and minimize unnecessary correspondence between USCIS, applicants, and counsel. 	<p>Regulations at 8 CFR 103.2(b)(19)(ii)(A) provide that when a requestor is represented, USCIS will send original notices both to the applicant or petitioner and their attorney or accredited representative of record.</p> <p>If multiple attorneys or accredited representatives were included on the Form G-28, USCIS would be required to capture the data on each attorney and send each of them a notice. That multiple notice requirement for all benefit requests is overly burdensome for USCIS to administer. In addition, validating more than one attorney or accredited representative as authorized to communicate with USCIS via the USCIS Contact Center for all benefit requests is overly burdensome for USCIS to administer. Thus, we decline the suggestion to permit more than one attorney or accredited representatives per Form G-28.</p> <p>To add a new attorney or accredited representative, a new Form G-28 is needed to remove the previous attorney or accredited representative and for the client to agree to allow USCIS to share information under the Privacy Act with the new attorney or accredited representative.</p>
Topic 4. Attorney Attestation			
0321		<p>AILA raises concerns about the new attorney attestation language included in Part 6 of the proposed Form G-28, arguing that it is unnecessary and redundant. Key points are as follows:</p> <p>1. Redundancy of Attestation:</p> <ul style="list-style-type: none"> ▪ Current Form G-28 already requires attorneys to attest to their eligibility to practice law, list their licensed jurisdictions, and affirm understanding of disciplinary actions under 8 CFR 103.2 and 292. ▪ The proposed attestation repeats these requirements, making it redundant. <p>2. Superfluous Requirement for Public Discipline Authorization:</p> <ul style="list-style-type: none"> ▪ Proposed language specifically requires attorneys to authorize or permit the publication of their name and findings of misconduct if subject to public discipline. 	<p>Response: Please see USCIS’ response below.</p> <p>1. – 2. There are no changes being proposed to attestation language from the most recently approved version of the Form G-28. See the Table of Changes: G28-012-FRM-TOC-REV-60Day-06302025. No changes are made as a result of this comment.</p>

		<ul style="list-style-type: none"> ▪ AILA argues this is unnecessary, as public censure is only one of several disciplinary actions under the regulations, and singling it out is unwarranted. ▪ Referencing the relevant regulatory provisions is sufficient without highlighting specific disciplinary actions. <p>Recommendation: Remove additional attestation in Part 6., as the current Form G-28 already adequately addresses the attorney’s obligations and understanding of disciplinary rules. The proposed language adds no substantive value and creates unnecessary redundancy.</p>	
Topic 5. Other Form/Instructions Recommendations			
0324	Form G-28	<p>Recommendations:</p> <p>1. Repeated Content: It is not necessary to repeat the attorney to use Part 6 if they need extra space.</p> <p>2. Part 1, Item 3 and Page 3, Part 4., Item 9: USCIS should allow for the full range of Secondary Unit Designators listed in Publication 28 – Postal Addressing Standards, Appendix C2.</p> <p>3. Part 1., Item 5-7: Recommend eliminating Item 5 mobile telephone number and Item 7 fax number to save space. If these are optional but useful for some other Form uses, consider moving them to the end of the Form.</p> <p>4. Part 2: This takes up too much space unnecessarily. Consolidate and separate the 4 options, e.g. using headers.</p> <p>5. Part 2, Item 1: Leave space for one jurisdiction. Revise the attestation to “the bar of the highest courts of the states, possessions, territories, commonwealths, or the District of Columbia listed below and on Page 5, if any”.</p>	<p>Response: Please see USCIS’ responses below.</p> <p>1. Part 7. Additional Information is repeated on the form under specific Item Numbers to clearly instruct that if extra space is needed to complete that specific Item Number this section is available for use.</p> <p>2. There are Secondary Unit Designator fields to input Apartment, Suite, and Floor and an associated Number available in the Address fields referenced. If you need extra space to complete this item and list other Secondary Unit Designators, Part 7. Additional Information is available for use.</p> <p>3. These data elements are optional for completion. For ease of completion, as applicable, these fields will remain in this section for Contact Information.</p> <p>4. Part 2. is already formatted into four options to collect the necessary information based on the selected applicable items.</p> <p>5. Part 2., Item Number 1. was formatted as such to provide the Attorney or Accredited Representative the opportunity to list at least three jurisdictions they are eligible to practice law in. By only providing one space, this may create additional burden for those licensed in multiple jurisdictions having to use a separate section, Part 7. Additional Information, to list more than one jurisdiction. We will not be making the recommended changes.</p>

		<p>6. Part 3: Consolidate; In Item 1, ask which agency, then in 2, ask what form numbers or specific matter(s). There is no need have 6 separate full page lines.</p> <p>7. Part 7, Signature and date: if USCIS insists on the requirement, then Page 5 should have such a signature block.</p>	<p>6. Part 3. is formatted as such to capture the specific form number(s) or matter in which appearance is entered and what agency this is associated with. The ability to determine the agency the immigration matter is associated with is necessary, therefore we will not be making the recommendation changes.</p> <p>7. Part 7. Additional Information does not include a signature block and date field because the person signing the request may sign anywhere on the additional information page and USCIS will accept that as sufficient. Most applicants sign and date the additional page in the top margin. USCIS will consider clarifying this requirement in the future.</p>
<p>0324</p>	<p>Form G-28 Instructions</p>	<p>Recommendations:</p> <p>1. Properly signed/valid signature: On pg. 2, USCIS either needs to define ‘properly signed’ or provide a link to what it defines as such. The commenter questioned why there is a switch to validity when previously the form states properly. The information regarding representatives, handwritten requirements, photocopy acceptance can go under a properly signed explanation. USCIS could then explain the consequences of a valid signature (properly signed form).</p> <p>2. Extra space: USCIS should remove the requirement for a signature and date on each extra page, or alternatively provide space to do so.</p> <p>3. Answer fully and completely: USCIS should clarify that irrelevant questions can be let blank.</p>	<p>Response: Please see USCIS’ responses below.</p> <p>1. The regulation at 8 CFR 103.2(a)(2) describes an “acceptable signature,” for filing purposes. Throughout the regulation at 8 CFR 103.2 similar terms such as “properly signed” at 8 CFR 103.2(a)(3) and “valid signature,” at 103.2(a)(7)(ii)(A) refer, synonymously, to the same signature requirements. USCIS has also published guidance in its policy manual regarding valid and acceptable signatures.¹ Therefore, USCIS thinks that form instructions and regulations are clear on signature requirements.</p> <p>2. Part 7. Additional Information does not include a signature block and date field because the person signing the request may sign anywhere on the additional information page and USCIS will accept that as sufficient. Most filers sign and date the additional page in the top margin. USCIS will consider clarifying this requirement in the future.</p> <p>3. USCIS agrees that some questions may be irrelevant in some cases, but we prefer that a requestor include something so we are sure the question was read. In response to the recommendation, we have added the following instructional content to provide more clarity: “If a question does not apply to you (for example, if you have never been married and the question asks, “Provide the name of your current spouse”), type</p>

¹ <https://www.uscis.gov/policy-manual/volume-1-part-b-chapter-2>

		<p>4. Updating contact information: On pg. 2, USCIS should provide more definitive instructions on how to update the contact information of the attorney.</p>	<p>or print “N/A” unless otherwise directed. If your answer to a question which requires a numeric response is zero or none (for example, “How many children do you have” or “How many times have you departed the United States”), type or print “None” unless otherwise directed.”</p> <p>4. Procedures for updating contact information may change over time, especially as USCIS tools (such as USCIS online accounts) are modernized. USCIS therefore declines to include such information in form instructions and instead provides information on such topics in avenues (such as the USCIS website) which can quickly be updated when procedural information changes.</p>
0321	Form G-28I	<p>AILA identifies two key issues with the proposed Form G-28I:</p> <p>1. Missing Client Consent Checkbox:</p> <ul style="list-style-type: none"> ▪ In Part 4 of Form G-28I, under "Client’s Consent to Representation and Signature," the checkbox for a client to indicate consent is missing. <p>2. Lack of Parity in Notice Options:</p> <ul style="list-style-type: none"> ▪ Form G-28I does not include several notice options available on Form G-28 under "Options Regarding Receipt of USCIS Notices." ▪ AILA recommends that Form G-28I provide comparable notice options to those on Form G-28, where applicable. 	<p>Response: Please see USCIS’ responses below.</p> <p>1. USCIS will not make this recommended change. The consent of the client is not optional if the Form G-28 is submitted and they consent to the representation and release of information based on completion of form and a signature. If a check box is added, and it is inadvertently not checked, indicating that consent is not provided, the form would have to be rejected. We prefer to not add that requirement.</p> <p>2. This difference is because the G-28I is used for cases outside the United States, and USCIS generally cannot mail secure documents to addresses outside the United States. USCIS declines to make edits.</p>
Topic 6. Request for All Jurisdictions of Attorney Licensure			
0321		<p>AILA opposes the proposed requirement for attorneys to list all jurisdictions in which they are licensed on Form G-28, arguing that it is unnecessary, inefficient, and imposes significant burdens without providing meaningful benefits. Key points are as follows:</p> <p>1. Unnecessary Requirement:</p> <ul style="list-style-type: none"> ▪ Attorneys are already subject to oversight by their primary licensing authorities and professional ethical obligations. 	<p>Response: The proposed requirement is necessary to assist USCIS in assuring that an attorney is not subject to discipline in any jurisdiction. The proposed requirement is not unduly burdensome; it would only require the respondent to add a few words, if any, to a Form G-28. USCIS cannot verify an attorney’s licensure if it does not know where the attorney is licensed.</p>

		<ul style="list-style-type: none"> ▪ USCIS has the authority to verify licensure with the primary state of admission, making the disclosure of all jurisdictions duplicative and administratively inefficient. <p>2. No Added Integrity Safeguards:</p> <ul style="list-style-type: none"> ▪ Listing additional jurisdictions does not enhance integrity or provide meaningful safeguards for confirming an attorney’s good standing to practice immigration law. <p>3. Increased Public Burden:</p> <ul style="list-style-type: none"> ▪ The additional time required to list all jurisdictions imposes a significant paperwork burden on attorneys. Even one extra minute per form, multiplied by USCIS’s estimate of 4,181,229 paper respondents annually, results in over 69,000 additional public burden hours. <p>4. Increased USCIS Processing Burden:</p> <ul style="list-style-type: none"> ▪ USCIS officers would need to review, process, and store the additional information, adding substantial workload. Even 30 seconds per form for processing additional jurisdictions equates to over 34,844 personnel hours annually. <p>Recommendation: AILA recommends that USCIS eliminate the requirement to list all jurisdictions of licensure, as it imposes unnecessary burdens on both practitioners and USCIS adjudicators without furthering the purposes of the Paperwork Reduction Act (PRA) or providing meaningful benefits.</p>	
Topic 7. Burden (PRA)			
0321 0323		<p>Commenters highlighted several key issues and recommendations below.</p> <p>1. Burden Estimation:</p> <ul style="list-style-type: none"> ▪ Burden estimate does not account for variability among respondents (e.g., individuals vs. organizations). ▪ Page increase from four to five pages increases the time required to complete and file the form, as well as the costs of paper, printing, postage, and storage. This will result in over 4 million additional sheets of paper and potentially over 69,000 additional public burden hours annually. 	<p>Response: Please see USCIS’ responses below.</p> <p>1. – 2. The number of respondents is classified as business or other for-profit types of respondents to account for the number of respondents that submit Form G-28, which comprises of attorneys and accredited representatives and law students and law graduates under the direct supervision of an attorney or accredited representative under 8 CFR 292.1(a)(2), and foreign attorneys using Form G-28I.</p>

		<ul style="list-style-type: none">▪ USCIS’s estimate of 3,814,793 annual burden hours and \$0 in costs fails to account for the time and financial impacts of the additional page, understating the true burden on both the public and the agency.▪ Methodology for estimating respondent burden does not factor in delays from preparing supporting documents. <p>2. Increased Costs for USCIS: The additional page increases scanning, processing, and storage requirements, leading to higher operational costs for USCIS.</p> <p>3. Operational Utility: Proposal lacks a clear explanation of how the data collected will directly improve USCIS decision-making. Linking each data point to specific operational use cases would strengthen its utility.</p>	<p>USCIS disagrees that the estimated hour burden per response to complete this revised form does not accurately reflect the time it takes to complete the form. USCIS has closely reviewed the estimated hour burden per response and decreased the average burden per response by 7 minutes to account for the removal of data fields and evidence for paralegals. USCIS acknowledges that some respondents may take less or more time to complete Form G-28 and prepare supporting documents, than the reported estimate. However, to report a higher than estimate could overestimate the time burden imposed on respondents. In regard to the page number increase, USCIS transitioned from a two-column to a one-column format of the form to make it easier to read and complete and to create efficiencies in data intake. The increase in pages did not increase the estimated hour burden per response, as there were not any new data fields added to the form, only the removal of various data fields and evidence for paralegals. In addition, these changes included the addition of clarifying language and instructional content. USCIS believes that the update from a two-column to one-column format, which only increased the form by one page, will not result in higher operational costs as this may create efficiencies in data intake.</p> <p>3. The data collected via the G-28 information collection instruments is used by DHS to determine eligibility of the individual to appear as a representative for a client in immigration matters before DHS. Form G-28 is used by attorneys admitted to practice in the United States and accredited representatives of accredited organizations recognized by the Board of Immigration Appeals. Form G-28I is used by attorneys admitted to the practice of law in countries other than the United States and only in matters in DHS offices outside the geographical confines of the United States. If the representative is eligible, the form is filed with the case and the information is entered into DHS systems.</p> <p>8 CFR 103.2 and 292.1 allow persons entitled to representation to be represented in matters before USCIS, ICE, and CBP. Representatives must file an appearance via the methods designated by DHS in each case. The G-28 information collection</p>
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Topic 8. APA Violation

<p>0321</p>		<p>AILA argues that USCIS’s proposed changes to Form G-28 instructions circumvent the notice-and-comment requirements of the Administrative Procedure Act (APA) and creates regulatory conflicts and procedural inconsistencies. Key points raised include:</p> <p>1. Inconsistency with Existing Regulations:</p> <ul style="list-style-type: none"> ▪ Proposed instructions conflict with 8 CFR § 103.2(a)(7)(ii)(A), which requires USCIS to reject benefit requests with invalid signatures at the time of filing and refrain from accepting filing fees. Accepting filing fees and later denying requests due to invalid signatures could cause harm to applicants, including loss of immigration status or eligibility and exposure to removal proceedings. ▪ Proposed change would allow USCIS to accept filings, process them, and later deny them due to signature deficiencies, which undermines regulatory obligations. ▪ Recommendations: 	<p>Response: USCIS disagrees whether these proposed changes violate the Administrative Procedure Act. The USCIS Policy and standard form instructions have provided since 2018 that a request that makes it through intake and is determined to not be validly signed will be rejected. The regulations at 8 CFR require a handwritten or electronic signature concomitant with the completion of the form. Once a request has been completed and submitted without a signature, the request content, information, and evidence can no longer be attested to with a separate, new, signature. Thus, because the invalid signature cannot generally be “cured” in a legally sufficient fashion, a Request for Evidence is not a valid solution. In addition, the volume of requests that USCIS receives requires that intake be automated and a review by a person not required for every request. Unsigned requests are easily detected and rejected during the automated intake process, but most invalid signatures, such as stamps, typed, or cut/pasted, cannot be detected until adjudication. As a result, invalidly signed requests cannot be promptly rejected, and USCIS generally</p>
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Topic 9. Support			
0322		<p>The proposed revision should be implemented and applied to allow for necessary adjudication processes and procedures. I am requesting an Exemption of Petition of the application for the Notice of Entry of Appearance as Accredited Representative and request assistance by authorizing the establishment of processes and requirements related to the Act and for the Secretary of State, the Secretary of Homeland Security, the U.S. Attorney General Counsel Secretary, the Secretary of USCIS and the Secretary of Commission to proceed, as appropriate and necessary on my behalf. This will allow for proper planning and the coordination of review of pertinent information related to pending cases.</p>	<p>Response: Thank you for your comment.</p>