

Form G-28-012 Revision - Responses to 30-day FRN Public Comments

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Comment ID	Comment Sub-Theme	Comment Summary	USCIS Response
Topic 1. Designated Paralegal			
0340		<p>The American Immigration Lawyers Association (AILA) advocates 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"> ▪ 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>Recommendations:</p>	<p>Response: Regulations at 8 CFR 292.1 governing who can provide representation before USCIS do not include paralegals.</p> <p>Paralegals generally do not meet criteria under 8 CFR 292.1(a)(3) for reputable individuals. Specifically, the regulations require (amongst other requirements) that reputable individuals have a pre-existing relationship or connection with the person entitled to representation, such as relative, neighbor, clergyman, business associate or personal friend and provide that such requirement may be waived, as a matter of administrative discretion, only in cases where adequate representation would not otherwise be available. Additionally, under the regulations at 8 CFR 292.1(a)(3), DHS does not grant permission to an individual to serve as a reputable individual if such person regularly engages in immigration and naturalization preparation.</p> <p>We decline to expand the role of paralegals at this time.</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>	
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Topic 2. Signature

<p>0340</p>	<p>Electronic Signature</p>	<p>The American Immigration Lawyers Association (AILA) 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. They argue that the current and proposed policies impose unnecessary burdens, create confusion, and fail to align with federal laws and best practices. Key points are as follows:</p> <p>1. Support for Electronic Signatures:</p> <ul style="list-style-type: none"> ▪ The commenter advocates 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. 	<p>Response: Please see USCIS’ responses below.</p> <ul style="list-style-type: none"> • USCIS accepts electronic signatures. USCIS forms filed online may be signed electronically when filing online through a USCIS online account. • 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
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		<ul style="list-style-type: none">▪ The commenter argues that allowing electronic signature certification for hard-copy forms would make the process easier and less burdensome for the public. <p>2. Inconsistency and legal conflict: The new rules are inconsistent with both USCIS's own acceptance of electronic signatures in online filings and with federal laws (like the Government Paperwork Elimination Act) and DHS directives that encourage electronic signatures to reduce paperwork.</p> <p>3. Concerns About New Rejection Grounds:</p> <ul style="list-style-type: none">▪ 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. <p>4. Unclear References: Reference to "<i>DHS Electronic Signature Policy Guidance</i>" is unclear and may cause further confusion about which policies apply. The cited reference may or may not be intended by the agency to refer to the <i>USCIS Policy Manual, Volume 1 – General Policies and Procedures, Part B - Submission of Benefit Requests, Chapter 2 – Signatures</i>, or possibly other electronic signature guidance published by DHS.</p> <p>Recommendations:</p> <p>1. Adopt Electronic Signatures: USCIS should allow electronic signatures for all filing methods, including paper forms, to enhance flexibility, efficiency, and access to counsel.</p> <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: USCIS should clearly specify which documents require original wet-ink signatures and provide</p>	<p>or typed signature to be affixed to a request in lieu of signing.</p> <ul style="list-style-type: none">• 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. <p>USCIS is focusing its technological enhancements on true, electronic, online filing. Facilitating acceptance of a digital signature affixed to a paper form runs counter to our efforts to increase the number of forms available for online filing, a more secure filing avenue than mail.</p>
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		unambiguous guidance, especially when multiple parties must sign the same form.	
0340	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>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>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 such as a sibling or grandparent (i.e., not a parent or guardian) 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.
Topic 3. Withdrawal of Form G-28			
0340		<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>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 are made as a result of this comment.

		<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.▪ This change would streamline adjudications, reduce public burden hours, and minimize unnecessary correspondence between USCIS, applicants, and counsel.	<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 make 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> <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</p>
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Topic 4. Attorney Attestation			
0340		<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. ▪ 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>	<p>Response: 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 and G28-012-FRM-TOC-REV-30Day-10302025. No changes are made as a result of this comment.</p>
Topic 5. Other Form Recommendations			
0340	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>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. 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>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>
<p>Topic 6. Request for All Jurisdictions of Attorney Licensure</p>			
<p>0340</p>		<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. ▪ 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>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>

		<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. Compliance with the PRA			
<p>0338 0339 0340</p>	<p>Underestimation of Burden</p>	<p>Commenters highlighted several key issues and recommendations below.</p> <p>1. Burden Estimation:</p> <ul style="list-style-type: none"> ▪ Actual burden, when considering real-world legal and administrative workflows, is at least 3.5 times higher than what USCIS reports. ▪ 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. ▪ 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. ▪ Estimates omit predictable, recurring tasks such as intake coordination, identity verification, correction loops, resubmissions, recordkeeping, and repeated data entry. ▪ Tasks like document management, signature chases, client communications, and supervisory file maintenance are not included in the official burden estimate. <p>2. Increased Costs for USCIS:</p> <ul style="list-style-type: none"> ▪ Additional page increases scanning, processing, and storage requirements, leading to higher operational costs for USCIS. ▪ Real financial costs associated with attorney services, printing, mailing, scanning, and storage, especially with the form’s expansion from four to five pages. ▪ USCIS claims a \$0 annual cost burden, but the comments highlight that this is not credible in the face of obvious lifecycle cost drivers. 	<p>Response: 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 an hour burden that is higher than estimated 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>For out-of-pocket costs on respondents, the individual forms where Form G-28 is filed would generally include a value for out-of-pocket costs incurred for the form’s preparation, such as attorney services, including filing Form G-28, postage, costs associated with gathering documentation, and document translation and preparation services.</p>

		<p>3. Limit Information Collection: Collect only the minimum information necessary to establish legal representation.</p> <p>4. Burden on Small Practices: Comments state that fixed administrative costs and repetitive data entry requirements place a disproportionate burden on small immigration law practices, nonprofits, accredited service providers, and small employers. These burdens increase overhead expenses, reduce the ability of small entities to serve clients, and raise transaction costs throughout the immigration system.</p>	
0338	Duplication	<p>The commenter made the following recommended correction actions to eliminate duplication:</p> <p>1. Implement Pre-Registered Representative Model: Use reusable credentials for representatives to avoid repeated data entry.</p> <p>2. Auto-Populate Data: Automatically fill in representation information on subsequent filings once representation is established.</p> <p>3. Reduce Correction Loops: Use clear validation logic and consistent electronic workflows to minimize the need for corrections.</p>	<p>Response: These recommendations are out of scope for the proposed revision to this information collection. USCIS continues to explore expanding online filing opportunities, including filing the Form G-28. If and when the agency adds this capability, USCIS will complete a separate action. USCIS did not make any changes as a result of these recommendations.</p>
Topic 8. APA Violation			
0338 0340		<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. 	<p>Response: USCIS disagrees that these proposed changes violate the Administrative Procedure Act.</p> <p>First, the signature instructions in the Form G-28 do not reflect a change in practice or policy. 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 denied.</p> <p>Second, regarding the commenters' suggestion that signatures only affect the filing at intake, 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 and typed signatures are easily detected and rejected during the automated intake process, but most invalid signatures, such as</p>

		<ul style="list-style-type: none"> ▪ Proposed change would allow USCIS to accept filings, process them, and later deny them due to signature deficiencies, which undermines regulatory obligations. ▪ Recommendations: <ul style="list-style-type: none"> (a) Comply with 8 CFR § 103.2(a)(7)(ii)(A) by promptly rejecting benefit requests with invalid signatures at the time of filing, rather than accepting filing fees and later denying requests. (b) Implement RFE mechanism to allow applicants to confirm the validity of signatures after filing or correct errors and refile, without facing these adverse consequences. <p>2. Failure to Follow APA Requirements:</p> <ul style="list-style-type: none"> ▪ USCIS is improperly using the PRA notice and form instructions to bypass the formal rulemaking process required under the APA. <ul style="list-style-type: none"> - Recommendation: Withdraw proposed changes to Form G-28 instructions and, if necessary, issue a proposed regulation through the APA’s notice-and-comment process to clarify signature validity requirements. ▪ Proceeding on an understated burden record is arbitrary and capricious and inconsistent with statutory requirements to minimize paperwork and administrative waste. 	<p>stamps, or cut/pasted, cannot be detected until adjudication. As a result, invalidly signed requests cannot be promptly rejected, and USCIS generally incurs costs to process requests where the applicant, petitioner or their representatives provides a signature that does not comply with 8 CFR 103.2(a)(2). Because the signer should be aware when they are not providing an original handwritten signature, a copy of a signed request as permitted by regulations, or a valid electronic signature, and USCIS incurs costs to process such requests, USCIS retains the fee in such cases and denies the request.</p> <p>Finally, regarding a request for evidence for a new signature, 8 CFR 103.2(a)(2) requires a handwritten or electronic signature concomitant with the completion of the form under penalty of perjury that attaches to the complete request and supporting evidence. Once a request has been completed and submitted without a valid 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.</p>
Topic 9. Oversight Requests			
0338		<p>The commenter requested the following formal oversight actions:</p> <ol style="list-style-type: none"> 1. OMB/OIRA: Require a revised supporting statement and redesign of the information collection instrument before granting approval. 2. GAO: Evaluate whether USCIS systematically underestimates the lifecycle burden in high-volume information collections. 3. DHS OIG: Review whether USCIS’s burden estimation practices and system design choices create unnecessary friction, cost, and waste in the immigration filing process. 	<p>Response: The revised Supporting Statement will be included with the package submitted to OMB-OIRA for review and approval. Please see responses in Topic 7. Compliance with the PRA, Underestimation of Burden regarding burden estimation.</p> <p>2. – 3. These comments are out of scope for the proposed revision of this information collection because they do not provide feedback on the actual information collection instrument.</p>

Topic 10. Support

0339	<p>The Center for Regulatory Freedom (CRF) supports the continued use and approval of Forms G-28 and G-281 by USCIS under the Paperwork Reduction Act (PRA). CRF argues that not all paperwork burdens are equal; these forms are essential for lawful immigration adjudication because they verify who is authorized to represent applicants and receive official communications. This verification helps prevent unauthorized or fraudulent representation, which can harm applicants and disrupt the immigration process. CRF emphasizes that the information collected is necessary, practical, and directly impacts case outcomes, distinguishing it from less valuable, purely administrative paperwork. The burden imposed by these forms is reasonable and proportionate to their function. CRF encourages efficiency improvements but cautions against weakening the verification process. Overall, CRF urges approval of these forms, stating they are vital for the integrity and proper functioning of immigration proceedings and align with the PRA's purpose.</p>	<p>Response: Thank you for your comment.</p>
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