

**From:** [Rachel Graber](#)  
**To:** [PRA Comments, EOIR \(EOIR\)](#)  
**Subject:** [EXTERNAL] Comment on the proposed rule re: Form EOIR-33  
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I am submitting this comment to express my strong opposition to the recent changes made to Form EOIR-33 (Change of Address/Contact Information Form). These updates, specifically the removal of the option to designate an "in care of" recipient, create unnecessary safety risks for vulnerable individuals and should be rescinded.

First, the Department of Justice (DOJ) bypassed the standard public engagement process required by the Paperwork Reduction Act (PRA) by seeking emergency authorization for these revisions. By skipping the typical 60-day and 30-day comment periods, the agency prevented the public from providing meaningful feedback before implementation. Furthermore, the agency has not provided a clear justification for why an emergency process was necessary or why the revised forms were published online months before the official notice.

Second, Form EOIR-33 has allowed respondents to use a third-party "in care of" address for more than twenty years. This feature is a vital safety tool for asylum seekers and survivors of domestic violence, human trafficking, and sexual assault. Many survivors rely on state-run address confidentiality programs or confidential shelter locations to remain hidden from their abusers. Forcing individuals to list a residential address when they are actively avoiding traffickers or abusers increases the risk of stalking and retaliation. Plus, removing this option conflicts with federal protections, such as those found in 8 U.S.C. 1367, which aim to safeguard the private information of survivors of abuse.

The DOJ's claim that these fields facilitate fraud is speculative and lacks supporting evidence. The form is already signed under penalty of perjury, providing an existing mechanism to ensure the accuracy of the information provided.

The primary function of Form EOIR-33 is to ensure that individuals receive critical legal notices. Designating a trusted intermediary—such as a community organization or legal representative—is often the most reliable way for individuals with unstable housing or safety concerns to stay informed about their proceedings.

By eliminating the "in care of" option, the agency is actually reducing the "practical utility" of the form. Instead of improving efficiency, this change disrupts established, reliable communication channels, making it more likely that vulnerable individuals will miss essential court documents.

In sum, the updated Form EOIR-33 prioritizes administrative preference over the physical safety and due process rights of those in the immigration system. I urge the Executive Office for Immigration Review (EOIR) to restore the "in care of" fields to ensure that all respondents can participate in their legal proceedings without being forced to compromise their personal safety.

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In a free society, some are guilty, but all are responsible.  
-- Abraham Joshua Heschel