

**Instructions and Template for Organizational Comment on “Alien Registration” Rule**

On the following page is a template to help you draft a public comment in response to the administration’s Interim Final Rule (IFR) on “Alien Registration.” (Read more about the rule [here](https://www.federalregister.gov/documents/2025/03/12/2025-03944/alien-registration-form-and-evidence-of-registration).)

**Why submit a public comment?** When the government proposes a new rule, they are required (by the Administrative Procedures Act) to give the public an opportunity to read the rule and submit comments. The comment you submit will be public record and available for anyone to read. After the comment period closes, the government agency that proposed the rule must read all of the comments submitted and take them into consideration when drafting the final version of the rule. If a very large number of people submit comments, and those comments identify significant problems with the regulation, then it will take longer for the final rule to be published and take effect or the agency may make amendments to the rule.

**How do I submit a comment?** Comments should be submitted online at regulations.gov [click [here](https://www.regulations.gov/document?D=USCIS-2019-0010-0001) to go directly to the Interim Final Rule]. Click on the “comment now” button and either enter your comment in the text box (must be fewer than 5,000 characters) or upload your comments as a PDF. There are also step-by-step commenting instructions available [here](https://cliniclegal.org/resources/step-step-instructions-how-submit-public-comment). Below are some important tips to keep in mind as you are drafting your comment.

**Write comments in your own words.** The template on the following pages is intended to help guide you and give you an example and ideas, but ***the comment should be edited with your original words***. Feel free to delete whole sections or paragraphs and replace them with your organization’s perspective on the issue. The agency will bundle any comments that are too similar to each other, and they may be considered as one comment, rather than as individual submissions.

It may be helpful, prior to drafting your comment, to do some research on your own program and practice, the demographics of your clients, and the local community. Consider what aspects of the rule will be particularly troublesome to your organization and your clients. Gather some numbers and statistics that you can use to demonstrate how many of your clients or people in your community will be affected, how and to what extent, and at what financial cost.

The template below contains different aspects of why we oppose this IFR. You can review and pull any of the aspects of particular interest to you and customize the language to fit your own organization’s position and experiences.

**Attach research and supporting documents (not required).** If you cite statistics or supporting documents in your comments, we recommend including them as an attachment so that they are clearly part of the administrative record. Another option is to include a live link to cited sources. If you include links, specifically request that the agency read the material at these links.

**Provide contact information for a representative of the organization.** Organizational comments should be signed by a representative of the organization. You should provide the business contact information of the representative for any follow-up questions or concerns. However, keep in mind that this comment will be publicly available, so personal addresses or cell phone numbers are not recommended.

[DATE]

*Submitted via www.regulations.gov*

Mr. Mark Phillips, Chief

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**Re: Alien Registration Form and Evidence of Registration, DHS Docket No. USCIS 2025-0004**

Our organization, NAME, submits this comment in response to the Interim Final Rule (IFR) on Alien Registration and Evidence of Registration published in the Federal Register on March 12, 2025, under DHS Docket No. USCIS-2025-0004, OMB Control Number 1615-NEW. Our organization strongly opposes the reanimation of a World War II-era policy, originally invoked during a time of war, that no longer aligns with the values and needs of a modern and diverse society. The administration should rescind this rule immediately.

[INSERT paragraph describing your organization, why this is particularly urgent to your organization, and the expertise that your organization has on issues raised.]

This Rule represents an excessive expansion of government oversight and surveillance over individuals within U.S. borders and sets a troubling precedent. While the registration is codified in the laws of the United States[[1]](#endnote-2) and it is lawful to ensure compliance, the law disproportionately impacts individuals and their families who have been living and contributing to society peacefully for years, especially those with pending immigration relief or humanitarian protections.

The registration requirements stem from policies that were designed in a vastly different geopolitical and social context. These laws, implemented during a time of heightened suspicion and xenophobia, are ill-suited to address the current state of immigration in the United States. Reviving such policies in the 21st century reflects an outdated and punitive approach to immigration that fails to align with contemporary values of inclusivity, fairness, and respect for human rights.

[Please continue to customize the language to make it unique to your organization. Include organizational data or a story that demonstrates why your organization or your clients are concerned about this issue.]

In addition, by requiring the completion of Form G-325R through myUSCIS and requiring that biometrics be collected, the rule imposes significant logistical and financial burdens on vulnerable populations. Many immigrants face challenges such as lack of digital literacy, language barriers, and limited access to reliable internet services. Although DHS claims the process is "free of charge," ancillary costs, such as missing work/school, arranging childcare, and even transportation to biometric appointments, can make compliance unattainable.

The enforcement of this archaic section of the law will create fear and confusion within vulnerable immigrant communities. Being undocumented is being treated as a criminal violation, leaving “unregistered” immigrants with the choice of registering with the government and putting themselves at risk of deportation or not registering and putting them at risk of criminal prosecution. This fear extends to individuals who are considered “registered,” which includes some undocumented immigrants, who will need to carry these registration documents in order to prevent prosecution. As such, this Rule creates a process for mass criminalization and deportation, since failing to carry proof of registration will have a criminal penalty.

Again, we vehemently oppose this rule as it is another tactic to instill fear and intimidate immigrant communities through enforcement policies that are inhumane.

Thank you for the opportunity to submit comments on the proposed Interim Final Rule. Please do not hesitate to contact [Insert contact information – reminder that these comments are public, do not put contact information that you do not want available to the public] to provide further information.

Name

Title

Organization

1. 8 U.S.C. 1301-1306 [↑](#endnote-ref-2)