



Catholic Legal Immigration Network, Inc.

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Submitted via Regulations.gov

April 4, 2025

Samantha Deshommès, Chief, Regulatory Coordination Division, Office of Policy and Strategy
United States Citizenship and Immigration Services
Department of Homeland Security

RE: OMB Control Number 1615-NEW, United States Citizenship and Immigration Services, Department of Homeland Security, Docket ID USCIS-2025-0002

The Catholic Legal Immigration Network, Inc. (CLINIC)¹ submits these comments regarding the current Agency Information Collection Activities; New Collection: Generic Clearance for the Collection of Certain Information on Immigration Forms. On March 3, 2025, the *Federal Register* released these proposed revisions to various immigration forms. CLINIC opposes some of the changes to the forms as unnecessary to the stated purpose and overly burdensome to the applicants and their representatives. Some of the proposed additional questions would discourage many potential applicants from applying for the immigration benefits for which they qualify. Any purported benefit gained by requesting certain personal information of the applicant’s family members is outweighed by the deterrent effect it would have on family reunification and the naturalization of lawful permanent residents.

Embracing the Gospel value of welcoming the stranger, CLINIC has promoted the dignity and protected the rights of immigrants in partnership with a dedicated network of Catholic and community legal immigration programs since its founding in 1988. CLINIC’s network, originally comprised of 17 programs, has now increased to 380 diocesan and community-based programs in 48 states and the District of Columbia. CLINIC is the largest nationwide network of nonprofit immigration programs. Through its affiliates, CLINIC advocates for the just and humane treatment of noncitizens through representation in proceedings before the U.S. Citizenship and Immigration Services. Many of CLINIC’s affiliate members represent low-income clients in their applications for naturalization, refugee or asylum status, refugee and asylee family reunification, advance parole or travel document, adjustment of status, and removal of conditions to lawful permanent residency.

I. Overarching Concerns

The USCIS is basing the proposed changes to various immigration forms on the Executive Order titled “Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats.” It proposes “enhanced screening and vetting standards” for applicants seeking nine specific immigration benefits. These additional questions would purportedly “enable USCIS to assess an alien’s eligibility to receive an immigration-related benefit.” CLINIC’s major concern is that some of the additional questions regarding the applicant’s family members would not accomplish the stated goals and would intimidate and deter applicants from applying for the needed benefits. CLINIC considers the additional questions as overburdensome to the applicants and their representatives. As a result, affected persons would

¹Charles Wheeler, Senior Attorney/Director Emeritus, Carolina Rivera Quintana, Federal Advocate and Liaison, and Karen Sullivan, Director of Advocacy, authored these comments.

elect instead to remain in their current immigration status and forgo seeking benefits they are otherwise eligible for.

II. Specific Concerns

The agency proposes asking for certain information regarding the applicant's parents, spouse, siblings, and children. The additional questions ask for these family member's:

- Name
- Telephone numbers used for the last five years
- Date of birth
- Place of birth, and
- Residence

CLINIC is most concerned with these questions being added to the following seven forms:

- Form N-400, Application for Naturalization
- Form I-131, Application for Travel Document
- Form I-485, Application to Register Permanent Residence or Adjust status
- Form I-589, Application for Asylum and for Withholding of Removal
- Form I-590, Registration for Classification as Refugee
- Form I-730, Refugee/Asylee Relative Petition
- Form I-751, Petition to Remove Conditions on Residence

CLINIC believes that (1) the information sought is not relevant to whether the applicant is eligible for the benefit sought; (2) would create an unnecessary burden on the applicant, and (3) would intimidate them from applying for the benefit. Many of our affiliates' clients reside in "mixed-status" families, i.e., the family members are residing here in different immigration categories or statuses. For example, a lawful permanent resident (LPR) may be eligible to apply for naturalization but would not want to reveal the residence and contact information of a spouse or parent who lacks lawful immigration status. Prior editions of the N-400 used to specifically ask questions regarding the LPR's spouse's residence and immigration status but were subsequently removed due to their "chilling" effect and lack of relevance to the applicant's eligibility to naturalize. CLINIC questions the USCIS's motive in seeking this additional information regarding the applicant's family members and asks whether it is meant simply to gather information for possible enforcement actions against them. The inclusion of these questions will certainly result in a decrease in filing of these applications, which will result in fewer: LPRs naturalizing; spouses, parents, children, and siblings applying for and obtaining for adjustment of status; asylees, refugees, parolees, persons granted TPS or DACA seeking to travel abroad for emergent or family-related reasons; and refugees or asylees seeking to reunify with their spouses or children. One of the pillars of the Immigration Act of 1965 was family reunification, which remains a central core of current immigration policy. This guiding principle would be seriously undermined if the USCIS proceeds to add these proposed questions, impose these additional burdens on the applicants and their legal representatives, and discourage otherwise eligible applicants from seeking immigration benefits.

III. CONCLUSION

CLINIC opposes the proposed collection of information regarding the applicant's family members as unnecessary for the proper performance of the functions of USCIS. It believes that the practical utility of the information sought will be outweighed by the inhibiting effect it would have on potential applicants.

Thank you for your consideration of these comments. Please do not hesitate to contact Karen Sullivan, Director of Advocacy, at ksullivan@cliniclegal.org, with any questions or concerns about our recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Anna Gallagher". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

Anna Gallagher
Executive Director