



Catholic Legal Immigration Network, Inc.

📍 8455 Colesville Road, Ste. 960
Silver Spring MD 20910

☎ (301) 565-4800

Submitted via Regulations.gov

April 10, 2025

Mark Phillips, Chief, Residence and Naturalization Division,
Office of Policy and Strategy
United States Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

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

The Catholic Legal Immigration Network, Inc. (CLINIC)¹ submits these comments regarding 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 1615-NEW. CLINIC strongly opposes this Interim Final Rule and urges the administration to rescind this rule immediately.

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 388 diocesan and community-based programs in 49 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 immigration agencies.

The USCIS is basing this IFR on the Executive Order titled “Protecting the American People Against Invasion.”² It directs the Secretary of DHS to take all appropriate actions to ensure unregistered immigrants register with DHS. CLINIC considers this rule to be an excessive use of government surveillance, and a tool of oppression against minorities in the United States. CLINIC also opposes this rule because of the financial burden and the chilling effect this IFR will have on vulnerable populations. Finally, this proposed rule will create a bigger strain on USCIS resources and the backlog of cases at this agency.

I. CLINIC Opposes the Expansion of Government Oversight and Surveillance

The expansion of government oversight through the IFR’s alien registration requirement raises serious concerns about privacy, civil liberties, and the potential for discriminatory enforcement. Mandating

¹Carolina Rivera Quintana, Federal Advocate and Liaison, Alyson Runco Beinert, Senior Staff Attorney, and Karen Sullivan, Director of Advocacy, authored these comments.

² Exec. Order No. 14159, 90 Fed. Reg. 8443 (Jan. 29, 2025), *see* <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>.

extensive data collection and surveillance of noncitizens can lead to profiling, stigmatization, and undue scrutiny of immigrant communities, often without clear justification or oversight. The enforcement of this archaic section of the law risks creating a climate of fear and mistrust, deterring individuals from seeking medical care, reporting crimes, enrolling children in school, or participating in civic life due to fears of being tracked or targeted. The alien registration requirement effectively treats entire communities as suspects rather than contributors, reinforcing harmful stereotypes and increasing the risk of harassment or abuse by both government officials and private actors emboldened by anti-immigrant rhetoric. Moreover, the normalization of mass surveillance for one group sets a dangerous precedent, potentially paving the way for broader erosions of privacy and civil rights for all individuals. Rather than enhancing national security, such measures undermine public trust, violate core democratic values, and shift the nation further away from its principles of fairness, inclusion, and justice.

II. CLINIC is Concerned about the Financial Burden this IFR will Cause

The IFR would create a significant financial burden on already vulnerable immigrant populations. Many noncitizens are low-income individuals and families who are already navigating costly and complex immigration processes, including application fees, legal representation, and work limitations. Requiring them to register and pay the proposed biometric fees and other ancillary costs, such as missing work or school, arranging childcare, and even travel for biometrics appointments, or to obtain specific documentation places an undue strain on their limited resources, and can make compliance unattainable. This burden may force individuals to choose between compliance and meeting basic needs like housing, food, or medical care.

Furthermore, the cost of implementing and maintaining such a registration system would also drain public funds that could be better invested in reducing existing USCIS backlogs for immigration benefits and affirmative asylum processing. Ultimately, the financial weight of this policy punishes those least able to afford it while offering little in return for public safety or administrative efficiency.

III. CLINIC Warns the Agency about the Chilling Effect on Vulnerable Populations

In addition to the financial hardship, this rule would have a chilling effect on immigrant communities, discouraging individuals from accessing essential services, reporting crimes, or engaging with schools and healthcare providers for fear of detention or arrest³ based on racial profiling by law enforcement.⁴ Vulnerable populations, including survivors of domestic violence and those with limited English proficiency would be particularly impacted, increasing their isolation and risk of exploitation. Ultimately, the policy imposes harsh economic and social costs on those least able to bear them, without delivering meaningful benefits to public safety or national security.

³ 90 Fed. Reg. at 11794 (citing 8 U.S.C. § 1304(e)). (“Noncitizens newly issued proof of registration and fingerprinting under the IFR can be prosecuted for failure to carry that proof of registration at all times.”)

⁴ Suzanne Gamboa and Nicole Acevedo, “Trump immigration raids snag U.S. citizens, including Native Americans, raising racial profiling fears,” *NBC News* (Jan. 28, 2025), available at <https://www.nbcnews.com/news/latino/trump-immigration-raids-citizens-profiling-accusations-native-american-rcna189203>; see also Robert Tait, “US academic groups sue White House over planned deportations of pro-Gaza students,” *The Guardian* (Mar. 25, 2025), available at <https://www.theguardian.com/us-news/2025/mar/25/pro-palestine-student-deportation-lawsuit>.

III. CLINIC is Concerned about the Implications for USCIS

Finally, CLINIC is concerned about the implications this new form will have for USCIS. The IFR will place an additional and unnecessary burden on an already overwhelmed U.S. Citizenship and Immigration Services (USCIS). USCIS is currently facing record-breaking backlogs, with millions of applications for visas, green cards, naturalization, and other benefits delayed—often for months or even years.⁵ Introducing a new registration mandate would divert limited resources, staff, and funding away from processing these critical applications, further slowing down the system and exacerbating delays for individuals and families awaiting life-changing immigration decisions. This would not only deepen the crisis within the agency but also create widespread frustration and hardship for applicants who are trying to follow the legal process. Instead of adding to the bureaucratic load, DHS should focus on streamlining and improving existing immigration functions to ensure timely and fair adjudications.

III. CONCLUSION

CLINIC strongly opposes the Interim Final Rule on Alien Registration and Evidence of Registration, as it imposes unnecessary burdens on vulnerable immigrant populations, exacerbates the financial strain on individuals, and contributes to the already overwhelming backlog at USCIS. This rule would also have far-reaching negative consequences for the privacy, civil liberties, and well-being of immigrant communities, while creating a chilling effect that discourages essential engagement with vital services. Rather than fostering national security or public safety, the IFR risks deepening divisions, promoting discrimination, and undermining trust in our immigration system. We urge the administration to rescind this rule and instead focus on policies that promote fairness, inclusion, and efficiency, in line with the nation's core democratic values and commitment to justice for all.

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 fluid and cursive, with the first name "Anna" and last name "Gallagher" clearly distinguishable.

Anna Gallagher
Executive Director

⁵ See, Adriel Orozco, “While federal firings focus on immigration processing, funding for immigration enforcement expands,” Immigration Impact, American Immigration Council (Mar. 6, 2025), *available at* <https://immigrationimpact.com/2025/03/06/federal-firings-immigration-processing-enforcement-expands/>.