



Catholic Legal Immigration Network, Inc.

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Submitted via Regulations.gov

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Jerry Rigdon, 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-2025-0006**

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 Biographic and Employment Identifiers on Immigration Forms. On May 29, 2025, the *Federal Register* released these proposed revisions to various immigration forms. CLINIC opposes one of these proposed changes to the forms as unnecessary to the stated purpose and overly burdensome for the applicants and their representatives. One 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 401 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 (USCIS). 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. The agency proposed on March 3, 2025, adding 24 data elements that "would constitute a new baseline threshold of data to be collected for improved identity verification and national security vetting." CLINIC has already submitted comments objecting to some of those additional questions. The agency is now proposing to supplement that list of 24 additional questions to add six other questions

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

concerning “biographic and employment identifiers used to help USCIS confirm both an individual's identity as it relates to the submitted application and to other records.” CLINIC’s major concern is that one 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 elect instead to remain in their current immigration status and forgo seeking benefits they are otherwise eligible for.

Another concern is that the “generic clearance” process is not used properly. Generally, generic clearance is intended for information collections that are voluntary, low-burden (measured by total burden, number of respondents, or burden per respondent), and uncontroversial. In practice, this includes technical or administrative collections, such as surveys, that do not raise significant privacy or policy concerns. The proposed information collection does not meet these criteria. If implemented, the revised forms would require applicants to disclose extensive and sensitive information, including detailed data about family members (such as contact information, residence, and national origin), and historical contact details like former email addresses and phone numbers. These are intrusive, substantive data points that implicate privacy and due process concerns. As such, this collection is neither minor nor routine, and it exceeds the permissible scope of the generic clearance process. The proposed revisions are too significant, too invasive, and too burdensome—both for applicants and the agency—to be justified under an expedited, fast-track review. Further, the Trump administration has consistently proclaimed that its chief immigration policy goal is to maximize detention and deportation, employing every available mechanism to achieve this end. Immigration benefit applications are no exception. The collection of detailed information about an applicant’s family members — even when those relationships are irrelevant to the benefit sought — appears driven by an intent to broaden the pool of individuals vulnerable to enforcement actions. In recent months, we have witnessed the administration’s weaponization of social media accounts to target individuals for detention and deportation. This escalation in enforcement, combined with a repeated disregard for constitutional protections, has provoked significant controversy, as reflected in the numerous immigration-related legal challenges currently underway.

II. Specific Concerns

The agency proposes asking for the Social Security Number (SSN) of the applicant’s parents, spouse, siblings, and children. 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 immigration 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 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 fact that a spouse or parent lacks an SSN. None of the above forms have ever asked for this information, yet that has never prevented the agency from determining whether the applicant qualifies for the benefit being sought. In the above example, it is difficult to understand how the spouse or parent's SSN—or lack of one—is even relevant to whether the LPR qualifies for naturalization, much less how this information would "protect the United States from foreign terrorists and other public safety threats."

CLINIC questions USCIS's motive in seeking the SSN of the applicant's family members and wonders whether it is meant simply to gather information for possible enforcement actions against them. The inclusion of this question 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 pillar of current immigration policy. This guiding principle would be seriously undermined if USCIS proceeds to add questions that 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' SSN as unnecessary for the proper performance of the functions of USCIS. It believes that any practical utility of the information sought will be outweighed by the inhibiting effect it would have on potential applicants.

Thank you for considering 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