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July 6, 2026

John R. Pfirrmann-Powell,  
Acting Deputy Chief  
Office of Policy and Strategy, Regulatory Coordination Division  
Department of Homeland Security

**Re: Comment in Response to Agency Information Collection Activities,  
Change of Address Form, OMB Control Number 1615-0007  
Docket ID No. USCIS-2008-0018**

Dear Acting Deputy Chief Pfirrmann-Powell:

The National Immigration Project submits the following comment in opposition to the U.S. Citizenship and Immigration Services (USCIS) proposed radical revision of the Change of Address Form, AR-11. USCIS seeks to change a straightforward, two-page form, the purpose of which is for a noncitizen to keep the Department of Homeland Security (DHS) apprised of their address, into an 11-page tool to collect entirely unrelated information.

The AR-11 revision seeks to add questions about a noncitizen's employment, education, and use of public benefits. We oppose this use of the AR-11 form because it goes beyond the form's purpose and heightens enforcement risks to noncitizens seeking to fulfill their duty to comply with statutorily-required address reporting.

The National Immigration Project is a national nonprofit membership organization that provides support, referrals, and legal and technical assistance to attorneys, community organizations, families, and advocates seeking to advance the rights of noncitizens. The National Immigration Project fights for dignity and due process for immigrants and their families through federal litigation, advocacy, and community organizing. We believe that DHS should not make mandatory forms onerous in length, nor should it use them for objectives unrelated to the form's core purpose. The National Immigration Project strongly opposes this proposed form revision.

#### **I. The proposed revisions are not necessary for the form's core purpose**

Form AR-11's purpose is for a noncitizen to report a change of address. This purpose is stated in both the form's current edition and the proposed version. The form serves the stated agency function of providing a means for noncitizens to comply with their address-reporting obligations under Immigration and Nationality Act (INA) § 1305. This requirement can be fulfilled without collecting information on employment, education, and use of means-tested public benefits.

Prior Federal Register notices described Form AR-11 as “a standardized format” for complying with statutory address change requirements.<sup>1</sup> DHS uses that same description for this notice. By statute, 8 U.S.C. § 1305, and regulation, the Attorney General may request “additional information” along with the address change. However, this section of the enabling statute is titled “Notices of change of address,” so there is no reason to believe that Congress intended the address collection form to include information entirely unrelated to the noncitizen’s address.

The implementing regulation, 8 C.F.R. § 265.1, requires covered noncitizens to report “each change of address and new address . . . in accordance with instructions provided by USCIS.” The reference to USCIS “instructions” should not be read as authorization to completely overhaul Form AR-11’s purpose and function. “Instructions” explain how to complete the form or how to submit it and should not be used to justify multiple pages worth of new substantive questions.

The proposed revisions do not meet the required practical utility test either. Under the Paperwork Reduction Act (PRA) regulations, “practical utility” refers to the information’s actual usefulness to the agency, including its accuracy, validity, reliability, and the agency’s ability to process the information in a useful and timely manner. 5 C.F.R. § 1320.3(l). Collecting information about a noncitizen’s employment, education, and possible use of public benefits does not make the reported address change more accurate, valid, or reliable. It merely adds unrelated questions to a form whose practical utility should be limited to reporting a new address.

The proposed revisions also conflate the purpose of reporting a change of address with the agency’s stated goal of determining deportability and coordinating with public benefit agencies. A noncitizen completing a change of address form should be able to provide DHS the information it needs to update its address records without answering extensive questions on unrelated topics. A simpler and more straightforward change of address form, like the one currently available, aids compliance by clearly identifying the information needed to update address records with DHS.

If DHS seeks to collect information for public charge or for enforcement under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), it should justify why Form AR-11 is the proper means for that collection. DHS should also explain the limits on how the information will be used, retained, shared, or protected, particularly since the noncitizen would be required to report about benefits which are actually intended to benefit other household members. Without these safeguards, the proposed revision will go beyond the form’s core purpose and become a broader enforcement tool.

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<sup>1</sup> See, e.g., Agency Information Collection Activities: Proposed Collection; Comment Request, 66 Fed. Reg. 43032 (Aug. 16, 2001); Agency Information Collection Activities: Extension of a Currently Approved Information Collection, 70 Fed. Reg. 1733 (Jan. 10, 2005); Agency Information Collection Activities: Form AR-11; Extension of an Existing Information Collection; Comment Request, 73 Fed. Reg. 19087 (Apr. 8, 2008); Agency Information Collection Activities; Extension, Without Change, of a Currently Approved Collection: Alien Change of Address Card, 85 Fed. Reg. 52621 (Aug. 26, 2020); Agency Information Collection Activities; Reinstatement, With Change, of a Previously Approved Collection: Change of Address, 89 Fed. Reg. 89024 (Nov. 12, 2024).

## **II. The proposed revisions would impose significant and unnecessary burdens**

The estimated burden for this proposed revision is significantly higher than the previous editions. Beyond the greater number of anticipated responses, the new form would also take longer to complete. In 2001, then-Immigration and Naturalization Service estimated 250,000 responses at five minutes per response, for a total annual burden of approximately 20,750 hours. In 2005 and 2008, USCIS estimated 720,000 responses at five minutes per response, for a total annual burden of approximately 59,760 hours. By 2024, USCIS estimated an average of thirteen minutes per response with 83,470 respondents filing through paper and 1,631,876 respondents filing online, for a total annual burden of 296,145 hours.<sup>2</sup>

Under the current proposal, DHS now estimates 244,274 respondents filing through paper and 2,440,059 respondents filing online—a total of over 2.6 million noncitizens. DHS estimates that the revised form would take roughly 30 minutes for both paper and online submissions, for a total annual burden of 1,268,965 hours. This is a drastic increase from estimates of the time it took to complete previous versions of the form and imposes significant and unnecessary burdens on both DHS and noncitizens.

The increase should weigh against adding unnecessary questions to Form AR-11. When DHS anticipates that millions of individuals will be required to submit this form, the agency should keep it clear and simple.

DHS's burden estimate also understates the actual burden of completing the revised form. Submitting the form would not merely require respondents to write or type in their answers. Respondents would first need to determine which benefits count as means-tested public benefits or whether benefits received by a U.S. citizen child or another household member must be reported, among other issues. These are not simple questions and DHS completely disregards the realities of completing this form for millions of anticipated respondents.

The burden is even greater because the proposed form itself warns that noncompliance with the address change requirement may result in criminal penalties or deportability. A respondent facing those consequences would reasonably treat each question with extreme caution and may hesitate to submit the form without seeking clarification or legal advice. In this context, it is unrealistic to assume that respondents will complete the revised form then prepare and attach additional documents for submission in just 30 minutes.<sup>3</sup>

## **III. The proposed revisions do not enhance the quality, utility, or clarity of the information collected**

For a change of address form, the quality, utility, and clarity of the information collected is measured by what the agency needs to update its address records. The only information a noncitizen should be required to report is their prior and current address and the current Form AR-11 already fulfills that function. Adding multiple pages of invasive questions does not

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<sup>2</sup> See *id.*

<sup>3</sup> See AR-11 Redline Form – Instructions, Paperwork Reduction Act.

enhance the information collected. Instead, it distorts the form’s purpose and makes noncitizens answer unrelated questions.

#### **IV. The proposed revisions would create a chilling effect on participation in benefits for which families are eligible**

While noncitizens are ineligible for many public benefits, there are benefits for which immigration status is not a factor. Furthermore, in many mixed-status families, some noncitizens’ family members are likely eligible for public benefits.<sup>4</sup> The proposed revisions may cause eligible families to forgo applying for or receiving these benefits out of fear. The chilling effect is more troubling because these public benefit programs serve basic needs: food, nutrition, healthcare, income support, and assistance for children and pregnant women. A change of address form should not discourage eligible families in need from accessing programs that Congress has made available to them.

For example, the Women, Infants, Children (WIC) program is generally available regardless of immigration status.<sup>5</sup> The WIC program provides food, nutrition support, and referrals to health and social services for both mothers and their children during pregnancy and early childhood.<sup>6</sup> Besides WIC, noncitizens may also benefit from other programs depending on their status and state law.<sup>7</sup> Certain qualified noncitizens may be eligible for emergency Medicaid, Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), or housing assistance.<sup>8</sup> These programs assist with basic needs that support some of the most vulnerable members of our communities. Yet under the proposed AR-11, a noncitizen WIC recipient updating their address would be required to disclose this use and fear that the disclosure will result in immigration consequences, whether or not it actually does. Many families would interpret these questions as red flags that will be tied to their A-files and that may prejudice pending or future benefits applications.

Recent findings show that many children are part of mixed-status families, and that 12 percent of U.S. citizen children have at least one noncitizen parent.<sup>9</sup> In 2025, many immigrant families avoided safety-net programs because of immigration concerns and fear that their personal

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<sup>4</sup> Valerie Lacarte, *Explainer: Immigrants and the Use of Public Benefits in the United States*, Migration Policy Institute (Oct. 2024) <https://www.migrationpolicy.org/content/immigrants-public-benefits-us> (“Mixed-status families can find themselves adversely affected by restrictions on noncitizens’ access to certain public benefit programs, even when the U.S.-citizen child is fully eligible.”).

<sup>5</sup> See e.g., N.Y. State Dep’t of Health, *Am I Eligible for WIC?* (Revised June 2026) <https://www.health.ny.gov/prevention/nutrition/wic/eligibility.htm>. (“Every eligible family can be certified for WIC regardless of immigration status.”). Wash. State Dep’t of Health, *WIC Eligibility*, <https://doh.wa.gov/you-and-your-family/wic/wic-eligibility> (“Being on WIC does not make you a public charge and does not affect your immigration status.”), D.C. Health, *Special Supplemental Nutrition Program for Women, Infants and Children (WIC)*, <https://dchealth.dc.gov/service/special-supplemental-nutrition-program-women-infants-and-children-wic> (“WIC does not ask or keep information about visa status or citizenship.”).

<sup>6</sup> USDA, *WIC: USDA’s Special Supplemental Nutrition Program for Women, Infants, and Children*, (Page updated May 21, 2026) <https://www.fna.usda.gov/wic/women-infants-and-children-wic>.

<sup>7</sup> Valerie Lacarte, Migration Policy Institute, *Explainer: Immigrants and the Use of Public Benefits in the United States* (Oct. 2024) <https://www.migrationpolicy.org/content/immigrants-public-benefits-us>.

<sup>8</sup> *Id.*

<sup>9</sup> KFF, *Key Facts on Health Coverage of Immigrants* (May 19, 2026) <https://www.kff.org/racial-equity-and-health-policy/key-facts-on-health-coverage-of-immigrants>.

information would be shared with immigration authorities.<sup>10</sup> These statistics demonstrate that the proposed revisions to the AR-11 would create a substantial risk of spillover harms to eligible family members, including U.S. citizen children.

#### **V. The proposed revisions heighten enforcement risks for noncitizens who comply with change of address requirements**

DHS should maintain the existing version of Form AR-11, which allows noncitizens to comply with the change of address requirements without providing DHS the means to surveil them and other members of their communities.

This concern is heightened by current enforcement patterns. Community spaces that immigrant families rely on are being targeted by immigration enforcement.<sup>11</sup> Schools,<sup>12</sup> healthcare facilities,<sup>13</sup> places of worship,<sup>14</sup> and workplaces<sup>15</sup> are among those spaces. These are spaces where families seek necessary services for support and their wellbeing. Requiring noncitizens to disclose their work and school information therefore creates an obvious and unnecessary risk. A noncitizen complying with the law should not have to disclose employment or education information unless DHS clearly explains why that information is necessary to process a change of address.

Schools especially should not be subject to increased DHS scrutiny and enforcement. There have been reports of students' increasing absences and dropout rates, worsening fear and mental-health concerns, and disrupted learning.<sup>16</sup> Requiring noncitizens to provide their school

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<sup>10</sup> Dulce Gonzalez and Jennifer M. Haley, et al, Urban Institute, *Immigrant Families Disengaged from Public Life and Essential Services Because of Immigration Concerns in 2025* (Apr. 2026) <https://www.urban.org/research/publication/immigrant-families-disengaged-public-life-and-essential-services-because>.

<sup>11</sup> Lynn Damiano Pearson, National Immigration Law Center, *Factsheet: Trump's Rescission of Protected Areas Policies Undermines Safety for All* (Feb. 26, 2025) <https://www.nilc.org/resources/factsheet-trumps-rescission-of-protected-areas-policies-undermines-safety-for-all/>.

<sup>12</sup> Naaz Modan, *Tracker: ICE activity on K-12 School Grounds*, K-12 DIVE, June 12, 2026, <https://www.k12dive.com/news/ice-activity-on-k-12-school-grounds/810648/>; Alyson Klein, *Educators Sue Over ICE Activity on School Grounds and Nearby*, EDUCATIONWEEK, Feb. 4, 2026, <https://www.edweek.org/policy-politics/educators-sue-over-ice-activity-on-school-grounds-and-nearby/2026/02>; Stephen Starr, *Unauthorized ICE "Wellness Checks" by Police at Ohio Schools Draw Outrage*, THE GUARDIAN, May 14, 2026, <https://www.theguardian.com/us-news/2026/may/14/ice-checks-police-cincinnati-schools>.

<sup>13</sup> Drishti Pillai, KFF, *Health Care Providers Warn of Impacts of Increased ICE Presence at Health Care Facilities* (Jan. 22, 2026) <https://www.kff.org/quick-insights/health-care-providers-warn-of-impacts-of-increased-ice-presence-at-health-care-facilities/>.

<sup>14</sup> Democracy Forward, *Religious Groups Sue Trump Administration Over ICE Enforcement in Houses of Worship* (Updated June 4, 2026) <https://democracyforward.org/work/legal/religious-groups-sue-trump-administration-over-ice-enforcement-in-houses-of-worship/>.

<sup>15</sup> American Immigration Council, *Understanding ICE Raids at American Workplaces* (Oct. 9, 2025), <https://www.americanimmigrationcouncil.org/fact-sheet/understanding-ice-worksite-raids/>.

<sup>16</sup> See, e.g., Thomas S. Dee, PNAS, *Recent Immigration Raids Increased Student Absences* (Nov. 4, 2025) <https://www.pnas.org/doi/10.1073/pnas.2510395122>; Carolyn Sattin-Bajaj, Brookings, *How Immigration Enforcement is Harming US Schools and Students* (Apr. 14, 2026) <https://www.brookings.edu/articles/how-immigration-enforcement-is-harming-us-schools-and-students/>; Carrie Spector, Stanford Institute for Economic Policy Research (SIEPR), *Student Absences Increased Under Threat of Deportation Efforts* (June 17, 2025) <https://siepr.stanford.edu/news/student-absences-increased-under-threat-deportation-efforts-study-finds>.

information would add to this harm by exposing the school itself to immigration enforcement when the form need only have requested an updated home address in order to accomplish its purpose.

Finally, DHS has not explained why it needs to know where noncitizens work or go to school when they are filing Form AR-11. A workplace or school is not a new residential or mailing address. Asking about this information would create confusion about what changes warrant a new AR-11 filing. A noncitizen may reasonably wonder whether they must submit an AR-11 when they change jobs or schools, even if their residential address has not changed. Furthermore, USCIS already collects information about an applicant's employment and education history through benefit applications such as Forms I-130, I-485, or I-589. If a noncitizen's updated information is relevant to adjudicating a pending application, USCIS can request additional evidence and conduct interviews. There is no reason that employment and school information is relevant to an address change.

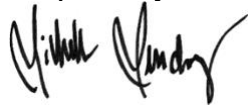
## **VI. Conclusion**

The PRA requires DHS to justify why the proposed collection is necessary, useful, clear, and minimally burdensome. DHS has not met that burden here. The statutory authority that DHS relies on to collect this information does not overcome that failure, especially in the face of the the agency's clear intention to serve broader enforcement purposes and not the narrow purpose of Form AR-11.

The purpose of Form AR-11 is for noncitizens to report a change of address. DHS has not explained why collecting information about a noncitizen's use of public benefits, employment, or education is necessary for this purpose. Form AR-11 should be preserved as a clear and straightforward way for noncitizens to provide their current contact information. We urge that these proposed revisions be withdrawn.

Thank you for the opportunity to comment. Please do not hesitate to contact Michelle Mendez, [michelle@nipnlg.org](mailto:michelle@nipnlg.org) if you have any questions or need any further information.<sup>17</sup>

Respectfully,



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<sup>17</sup> Victoria Neilson, Supervising Attorney, and Sarah Raterta, CUNY School of Law, anticipated graduation 2027 authored this comment with contributions from Caitlin Bellis, Director of Advocacy.