

July 6, 2026

Mr. John Pfirrmann-Powell
Acting Deputy Chief, Regulatory Coordination Division
USCIS Office of Policy and Strategy
5900 Capital Gateway Drive
Camp Springs, MD 20746

Submitted via www.regulations.gov

RE: "Agency Information Collection Activities; Reinstatement, With Change, of a Previously Approved Collection for Which Approval Has Expired: Alien Change of Address"
OMB Control Number: 1615-0007; Docket ID USCIS-2008-0018

Dear Mr. Pfirrmann-Powell:

On behalf of the undersigned organizations, we submit this comment in opposition to the U.S. Citizenship and Immigration Service's (USCIS) proposed changes to the Form AR-11 published in the Federal Register Notice on May 7, 2026 (hereinafter "Notice").¹

Our organizations assist, support, and advocate on behalf of immigrant survivors of domestic violence, sexual assault, human trafficking, and other crimes and abuses. We appreciate the opportunity to provide comments to the proposed changes to the Form AR-11 as well as to identify the barriers survivors encounter as a result of current USCIS practice relating to changes of address. Given the focus of our work, **we strongly oppose the proposed revisions and call for their immediate withdrawal.** They exceed the limited purpose of the Form AR-11, harm survivors, sow fear and confusion, raise serious privacy concerns, and violate the Paperwork Reduction Act (PRA).

I. The proposed changes vastly exceed the original intent and purpose of the Form AR-11

Section 265 of the Immigration and Nationality Act (INA) requires all noncitizens subject to the registration requirement to report any change of address within 10 days of occurrence to USCIS. This includes survivors and their family members applying for U and T nonimmigrant status, as well as those applying for Violence Against Women Act (VAWA) self-petitions and

¹ Department of Homeland Security. "Agency Information Collection Activities; Reinstatement, With Change, of a Previously Approved Collection for Which Approval Has Expired: Alien Change of Address" OMB Control Number: 1615-0007; Docket ID USCIS-2008-0018; 91 FR 24910 (May 7, 2026) available at <https://www.federalregister.gov/documents/2026/05/07/2026-09107/agency-information-collection-activities-reinstatement-with-change-of-a-previously-approved>.

related applications.² For decades, the Form AR-11 has been tied to INA §265 requirements and its purpose remained straightforward– to report a change of address.³

The Notice states that the Secretary is using the statutory authority under INA §287 to expand the form's use to collect information about employment, school, and benefits. This statute covers broad, general powers of immigration officers, including arrests, border actions, felony arrests, among others. However, INA §287 provides no authority or guidance regarding data collection obligations of benefit requestors. INA §265 and its implementing regulation specifically require reporting a change of address within ten days; they do not require or authorize collecting any other additional information. Relying on INA §287 to justify this broad expansion to the INA §265 requirements is ultra vires and represents a vast departure from decades of prior use of Form AR-11.

If adopted, these revisions would require benefit requestors to report their employment, education, and receipt of "means-tested public benefits." Such questions transform the Form AR-11 from a simple address update into an expansive data collection with serious surveillance and enforcement implications, without safeguards to protect the privacy of survivors and the institutions that serve them.

II. The proposed changes regarding addresses create safety risks for survivors

Leaving an abusive relationship or trafficker can be the most dangerous time for survivors.⁴ Recent changes to address requirements, including those proposed in this Notice, fail to address the needs of survivors residing in rape crisis, human trafficking, or domestic violence shelters whose addresses must remain confidential for the safety of their staff and residents pursuant to shelter policy, state law, or both. The proposed revisions disregard the need for some survivors to mark their addresses as confidential, given the rules protecting the disclosure of domestic violence shelter addresses.

The Family Violence Prevention and Services Act (FVPSA) and VAWA already prohibit the disclosure by any shelter, rape crisis center, domestic violence program, or similar service, of information about victims they serve.⁵ State laws also protect against disclosure of

² USCIS, Policy Alert: Applicability of 8 U.S.C. § 1367(a)(1) and (a)(2) Provisions (December 22, 2025), available at <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20251222-VAWAConfidentiality.pdf>

³ See, e.g., DHS, Office of the Citizenship and Immigration Services Ombudsman, "Recommendation from the CIS Ombudsman to the Director, USCIS" (June 9, 2006), available at https://www.dhs.gov/sites/default/files/publications/cisombudsman_rr_28_online_change_of_address_06-09-06.pdf; See e.g., Form AR-11 Revision Date (Rev. 11/07/02), available at <https://www2.gtlaw.com/practices/immigration/dyk/AR-11.pdf>

⁴ See, e.g., Women Against Abuse, <https://www.womenagainstabuse.org/education-resources/learn-about-abuse/why-its-so-difficult-to-leave>

⁵ The Violence Against Women Act of 1994, Pub. L. No. 103-222, Title IV, 108 Stat. 1902-55 (codified in scattered sections of 8 U.S.C. and 42 U.S.C.); The Family Violence Prevention and Services Act of 1984, Pub. L. No. 98-457 (codified in 42 U.S.C. Section 10401, et seq.).

confidential shelter addresses in legal or court proceedings.⁶ In addition, many states offer address confidentiality programs that provide survivors with a P.O. Box address.⁷

Congress recognized the importance of address confidentiality in the VAWA Reauthorization of 2005, directing DHS to develop regulations and guidance with regard to identification documents to “consider and address the needs of victims, including victims of battery, extreme cruelty, domestic violence, dating violence, sexual assault, stalking or trafficking, who are entitled to enroll in State address confidentiality programs, whose addresses are entitled to be suppressed under State or Federal law or suppressed by a court order, or who are protected from disclosure of information pursuant to section 384 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (8 U.S.C. § 1367)”⁸

The proposed Form AR-11 contains no provisions or instructions regarding safe addresses, leaving survivors experiencing housing insecurity, living in safe housing facilities, or who are otherwise required to keep their address confidential, without a way to protect their safety. Requiring survivors to list their street addresses on immigration forms conflicts with these protections and in the case of rape crisis, human trafficking, or domestic violence shelters, violates the privacy of staff and other residents of the shelters. USCIS should permit survivors to use confidential state provided P.O. Boxes or to write “Confidential” in their physical address field on application forms and the Form AR-11, and indicate that they are currently residing in a shelter for survivors.

III. The proposed changes will produce a chilling effect among immigrant survivors of violence

The proposed changes to the Form AR-11 may deter victims from obtaining the healthcare and other services they need to heal from abuse. Because the Form AR-11 explicitly states that information regarding school, employment, and use of means-tested public benefits could be used for enforcement purposes, it will inevitably chill the use of life sustaining benefits by immigrant survivors who qualify for them.⁹

For victims of domestic violence, sexual assault, child abuse, human trafficking, and

⁶ See e.g., Empire Justice Center, New York Laws Involving the Confidentiality of Domestic Violence Victim-Related Information, at https://empirejustice.org/resources_post/new-york-laws-involving-the-confidentiality-of-domestic-violence-victim-relates-information/.

⁷ See e.g., Secretary of the Commonwealth of Massachusetts, Address Confidentiality Program, at <https://www.sec.state.ma.us/divisions/acp/address-confidentiality-program.htm>.

⁸ Pub. Law. 109-162, §827 (Jan. 5, 2006), 119 STAT. 3066

⁹ See, e.g., KFF, “Changes to Public Charge Regulations Will Likely Lead More Immigrant Families to Avoid Health Care and Assistance Programs” (November 18, 2025), available at <https://www.kff.org/immigrant-health/kff-new-york-times-2025-survey-of-immigrants-health-and-health-care-experiences-during-the-second-trump-administration/>; See also Dulce Gonzalez & Hamutal Bernstein, Urban Institute, “One in Four Adults in Mixed-Status Families Did Not Participate in Safety Net Programs in 2022 Because of Green Card Concerns” (August 17, 2023), available at <https://www.urban.org/research/publication/one-four-adults-mixed-status-families-did-not-participate-safety-net-programs-2022-because-green-card-concerns>.

other forms of violence and exploitation, access to the social safety net, including housing assistance, nutrition programs, and healthcare, plays a critical role in enabling victims to leave abusive situations and stabilize their families. Research finds that 50 to 60 percent of women who at any point experience domestic violence participate in economic security programs,¹⁰ and that trauma-informed health and mental health services are a primary vehicle for reducing re-victimization and promoting stability during recovery.¹¹

Due to the passage of H.R.1, as of October 2026, only three categories of lawfully residing noncitizens will remain eligible for federally funded full scope Medicaid and Children's Health Insurance Program (CHIP) coverage: lawful permanent residents (most of whom are subject to the five-year waiting period), Cuban/Haitian entrants, and COFA migrants (Compact of Free Association citizens of the Micronesia, the Marshall Islands, and Palau). Immigrant survivors of trafficking, VAWA self-petitioners, asylees, and refugees, among other formerly qualified noncitizens, will no longer be eligible for Medicaid and CHIP benefits.

While some services remain available to all survivors regardless of status, these proposed changes to the Form AR-11, combined with the public charge rule among other harmful proposed policies, will compromise survivors' health options and make long-term self-sufficiency far harder to achieve. When those who are eligible avoid vital services and supports, the resulting harms extend beyond individual immigrants to families, providers, and entire communities. Children, many of whom are U.S. citizens, can lose access to health care, food assistance, and other essential services.¹² Survivors and their families can experience greater instability. Delayed or forgone care can also leave people with more serious health needs later, increasing burdens on providers and health systems.¹³

Noncitizens-especially survivors seeking safety and stability for themselves and their families-may respond to this information collection by disenrolling from programs or declining to seek benefits for their U.S. citizen children, including means tested benefits for which they may be eligible. This leaves them increasingly vulnerable to preventable health emergencies. Service providers working with survivors will need to spend increased time and resources ensuring survivors can continue to participate in critical programs for which they qualify and explaining what information the government is requesting and why (which is vastly unclear).

¹⁰ Center for Budget and Policy Priorities. "TANF and Domestic Violence: Cash Assistance Matters to Survivors (October 21, 2021), available at <https://www.cbpp.org/research/income-security/tanf-and-domestic-violence-cash-assistance-matters-to-survivor>

¹¹ Carole Warshaw & Phyllis Brashler, "Mental Health Treatment for Survivors of Intimate Partner Violence," in *Intimate Partner Violence: A Health-Based Perspective* 335, 335-87 (Connie Mitchell & Deirdre Anglin eds., 2009).

¹² See, e.g. *Do state laws reduce uptake of Medicaid/CHIP by U.S. citizen children in immigrant families: evaluating evidence for a chilling effect*, 21 Int'l J. for Equity in Health 50 (Apr. 12, 2022), <https://pmc.ncbi.nlm.nih.gov/articles/PMC9006602/> (finding that immigrant restrictive policies could lead to reduced access to benefits even for citizen children in immigrant families).

¹³ See, e.g., Veronica Cifuentes, *As Chilling Effects of the Public Charge Rule Linger, How Can Health Systems Support Immigrant Families and Increase Their Access to Essential Services?*, Children's Hospital of Philadelphia PolicyLab (Sep. 26, 2024), <https://policylab.chop.edu/blog/chilling-effects-public-charge-rule-linger-how-can-health-systems-support-immigrant-families>.

A simple change of address form should not provoke such an existential choice, particularly for those fleeing domestic violence or who have experienced rape, crime, or trafficking.

IV. The proposed changes do not explain how the government will protect the information collected

This proposal conflicts with DHS's own privacy policy and the Fair Information Practice Principles (FIPP), which require agencies to limit data collection to what is necessary for the stated purpose. As noted above, the stated purpose of the Form AR-11 is address change notification. Education, employment, and benefits information go well beyond that purpose, and the Notice does not explain how collecting this information from every filer satisfies data minimization principles.

Moreover, the Notice does not disclose whether the proposed Form AR-11 data would be used for additional screening, profiling, data matching, or automated analysis, including through artificial intelligence (AI), or what safeguards or oversight would exist. That uncertainty will increase distrust and make it harder to reassure individuals that completing a routine address form will not expose them to surveillance, enforcement, or other adverse consequences.

As noted above, privacy and confidentiality are essential to the agency and safety of survivors of domestic violence, sexual assault, human trafficking and other crimes. In recognition of this, Congress created critical protections for victims under laws such as 8 U.S.C. § 1367, VAWA,¹⁴ and FVPSA¹⁵ so that survivors' information is properly safeguarded. USCIS does not explain how it plans to protect information provided by survivors with pending VAWA, U or T benefit requests from unlawful disclosure pursuant to the confidentiality protections contained in 8 U.S.C. § 1367. The proposed Form AR-11 mentions that USCIS may share the information, as appropriate, for law enforcement purposes, but makes no mention how the agency will adhere to 8 U.S.C. §1367 and related guidance.¹⁶

V. The proposed changes violate the Paperwork Reduction Act (PRA)

Under the PRA,¹⁷ USCIS must show that any information it collects is necessary, has practical utility, and minimizes the burden on the public. The regulations at 5 C.F.R. 1320.3(l) define "practical utility" to mean the **actual, not merely the theoretical or potential**, usefulness of information to or for an agency, taking into account its accuracy, validity, adequacy, and

¹⁴ 34 USC §12291(b)(2)(A), noting "[i]n order to ensure the safety of adult, youth, and child victims of domestic violence, dating violence, sexual assault, or stalking, and their families, grantees and subgrantees... shall protect the confidentiality and privacy of persons receiving services."

¹⁵ 42 U.S.C. §10406(c)(5)(A).

¹⁶ 8 U.S.C. §1367(b) provides that the "Secretary of Homeland Security or the Attorney General may provide in the discretion of the Secretary or the Attorney General for the disclosure of information to law enforcement officials to be used solely for a legitimate law enforcement purpose **in a manner that protects the confidentiality of such information.**" [Emphasis added].

¹⁷ 44 U.S.C. § 3501 et seq. (1980).

reliability, and the agency's ability to process the information it collects in a useful and timely fashion.¹⁸

USCIS is proposing to turn a two-page form into an eleven-page form. USCIS has not explained why the proposed revisions are necessary in the context of the Form AR-11, what practical utility it has related to the INA § 265 requirements, or why these questions should be asked through this information collection specifically.

A central purpose of the PRA is to reduce the burden on individuals, small businesses, and educational and nonprofit organizations resulting from the federal government's information collection.¹⁹ USCIS has not adequately accounted for the burden on individuals, service providers, and communities with limited English proficiency or limited access to legal representation. The proposed revisions to the Form AR-11 impose an undue burden on organizations serving survivors, increasing their operational costs and administrative workload.

USCIS estimates that the form can be completed in 30 minutes or less and that the annual cost burden is \$916,028.²⁰ Those estimates appear to significantly underestimate the time and cost of gathering and accurately reporting employment, education, and benefits information, including translation and interpretation for individuals with limited English proficiency. In the proposed revisions, Part 6: Information on Means-Tested Public Benefits Received states "have you **ever** received any of the following means-tested benefits²¹"; thus this section could cover a potentially unlimited period over the course of an individual's life.

This is a significantly more time-consuming task than reporting a new address. The proposed Form AR-11 contains provisions that are not written in plain language and are hard to understand.²² This may be a violation of the Plain Writing Act of 2010, which requires agencies to use plain writing in every covered document the agency issues after October 13, 2011.²³ Filling out the proposed Form AR-11 may require multiple meetings with clients to properly fill out the form in addition to the time and burden of obtaining documentation over an indefinite period of time. Because the proposed form instructs filers to provide a separate entry for each time period in which they received a benefit, ascertaining this information could be a tremendous burden, especially for survivors who may have had to relocate or may not have access to documentation.

The PRA also recognizes the importance of protecting individual privacy by limiting data collection to information that is necessary and relevant to an agency's function. Here, USCIS proposes to collect sensitive information about employment, education, and public benefits

¹⁸ 5 C.F.R. 1320.3(l) [Emphasis added].

¹⁹ 44 USC § 3501(1).

²⁰ Notice at 24911.

²¹ See Proposed AR-11, available at <https://www.regulations.gov/document/USCIS-2008-0018-0057> [Emphasis added].

²² See *Id.* Part I: Application Type "I am an alien updating my address as required under INA 265.", available at <https://www.regulations.gov/document/USCIS-2008-0018-0057>

²³ Plain Writing Act of 2010, Pub. L. No. 111-274, 124 Stat. 2861 (Oct. 13, 2010).

through a change of address form without explaining why that information is necessary or how collecting it through the proposed Form AR-11 serves a legitimate agency purpose.

The proposed Form AR-11 revisions would transform a routine and simple administrative requirement into an overbroad data collection tool requiring information wholly irrelevant to an individual's change of address, making it much harder for noncitizens to understand what the form is asking, why the government wants the information, and how that information may be used.

Conclusion

USCIS has not demonstrated that the current Form AR-11 is insufficient for its intended purpose to register a change of address, such that the form necessitates a dramatic increase in length and scope of information collected. The negative impact on survivors far outweighs the administrative benefits of the proposed changes. We therefore strongly urge USCIS to withdraw the proposed revisions and maintain the Form AR-11 as a narrow address reporting form. These proposed revisions would undermine the ability of immigrant survivors and their families to access safety and the vital services and benefits for which they are eligible.

Thank you for the opportunity to comment on this important matter.

Respectfully submitted:

Asian Pacific Institute on Gender-Based Violence
ASISTA Immigration Assistance
Beyond Survival
Center for Gender & Refugee Studies
Coalition to Abolish Slavery and Trafficking
Esperanza United
Freedom Network USA
Her Justice
Human Trafficking Legal Center
Immigrant Legal Resource Center (ILRC)
Justice + Joy National Collaborative
Legal Momentum, the Women's Legal Defense & Education Fund
National Network To End Domestic Violence
Nevada Coalition to End Domestic and Sexual Violence
Sunita Jain Anti-Trafficking Initiative Loyola Law School
Survivor Justice Center
Tahirih Justice Center
Violence Free Minnesota
Wisconsin Coalition Against Sexual Assault