

September 14, 2026

USCIS
John R. Pfirrmann-Powell
Acting Deputy Chief
Office of Policy and Strategy

Regulatory Coordination Division

**RE: Sign-On Letter Opposing Proposed Changes to Form I-130, Petition for Alien Relative
— OMB No. 1615-0012; Docket ID USCIS 2007-0037**

Dear Acting Deputy Chief Pfirrmann-Powell:

The undersigned organizations strongly oppose the proposed revisions to Form I-130, Petition for Alien Relative, published by U.S. Citizenship and Immigration Services (USCIS) on July 16, 2026.

We urge USCIS to withdraw the proposed revisions and maintain the current Form I-130. The proposed form more than doubles the length of the I-130—from 12 to 25 pages—and substantially expands the information required from petitioners and beneficiaries. The proposed revisions also expand the circumstances in which Form I-130A would be required, adding further burdens to families seeking to reunite through the family-based immigration system.

These changes are particularly concerning because many of the proposed questions are not necessary to determine whether a petitioner is eligible to file an I-130 petition or whether the petitioner and beneficiary have the qualifying family relationship required by law. Instead, the proposed form seeks extensive information concerning employment and educational history, address history, parents and family circumstances, immigration status, and criminal and arrest history. Much of this information is either duplicative of information collected elsewhere or unrelated to the determinations that USCIS is required to make at the I-130 stage.

1. The proposed revisions exceed the purpose of Form I-130.

Form I-130 serves a specific and limited purpose: establishing that the petitioner is a U.S. Citizen or Lawful Permanent Resident (LPR) with the requisite ability to petition and that the beneficiary has the qualifying family relationship required for the applicable immigrant visa category.¹

Approval of an I-130 petition does not itself grant lawful immigration status, permanent residence, admission to the United States, or employment authorization. Nor does approval

¹ 8 CFR 204.1 specifies the type of petitions that may be filed by a USC or LPR and details the supporting documentation to prove the petitioner (USC or LPR)'s status and the qualifying relationship to the beneficiary relative.

determine whether a beneficiary is admissible to the United States. Those issues are generally addressed at later stages of the immigration process, including adjustment of status or immigrant visa processing.

Still, the proposed form introduces questions that appear directed toward issues beyond the core eligibility determination for an I-130 petition. USCIS has not adequately explained the statutory or regulatory authority for collecting this information or how each category of information is necessary to adjudicate the petition.

For example, the proposed form would require information concerning detailed information about prior marriages, information about the petitioner's parents, and extensive information concerning arrests, citations, charges, and other interactions with law enforcement. It would also require petitioners to provide extensive information about beneficiaries. These inquiries should be removed because they are unnecessary to establish the petitioner's status and the qualifying relationship between the petitioner and beneficiary.

2. The proposed revisions impose unnecessary and duplicative burdens.

The proposed revisions would impose substantial new burdens on U.S. Citizen and LPR petitioners, beneficiaries, legal service providers, and USCIS adjudicators. The proposed revisions would also expand the requirement to complete Form I-130A to beneficiaries over age 14 who are physically present in the United States, rather than limiting that requirement to the circumstances in which it is currently applicable.

Requiring beneficiaries—including individuals as young as 14—to review and certify information entered by a petitioner creates additional burdens and potential opportunities for innocuous discrepancies or errors. These burdens are particularly significant for families with limited English proficiency, limited access to legal assistance providers, or limited ability to obtain historical records.

The proposed revisions also place additional burdens on practitioners and community-based organizations that assist families with immigration filings. Collecting and verifying years of employment, educational, residential, and criminal-history information can require substantial time and resources, without a demonstrated connection to the legal requirements for an I-130 petition.

3. The proposed information collection does not satisfy the Paperwork Reduction Act.

The Paperwork Reduction Act requires federal agencies to demonstrate that information collections are necessary, have practical utility, and minimize unnecessary burdens on the public.² USCIS has not adequately demonstrated why the extensive new information proposed for Form I-130 is necessary to adjudicate family petitions. The agency's estimated completion

² 44 U.S.C. § 3501 et seq. (1980).

times also appear inconsistent with the substantial increase in the length and complexity of the proposed form and the additional time necessary to gather and verify historical information.

A form that more than doubles in length and requires extensive new categories of information necessarily creates additional costs and burdens for petitioners and beneficiaries. Those burdens require meaningful justification, particularly where the information is not necessary to determine whether a qualifying family relationship exists.

4. The proposed revisions raise serious Administrative Procedure Act concerns.

The proposed form also raises significant concerns under the Administrative Procedure Act because the form appears to impose substantive requirements that are not established by statute or regulation. USCIS may not use an information-collection instrument as a substitute for statutory or regulatory authority. Where the agency seeks to impose substantive eligibility requirements or otherwise change the legal standards governing immigration benefits, it must identify the authority for those changes and comply with applicable procedural requirements.

The proposed revisions are particularly troubling because they appear to introduce inquiries concerning discretion, admissibility, criminal history, and other factors that generally do not determine whether a qualifying family petition may be approved. USCIS should not use the Form I-130 information-collection process to expand the substantive requirements applicable to family-based petitions without clear legal authority and appropriate rulemaking.

5. The proposed changes threaten family unity and create downstream consequences

Family-based immigration petitions are an essential mechanism through which U.S. Citizens and LPRs seek to reunite with eligible family members. Adding unnecessary barriers at the first stage of this process risks delaying family reunification and increasing the likelihood of errors, denials, and unnecessary requests for evidence.

The proposed form may also create uncertainty about how information provided at the I-130 stage will be used later in the immigration process. Petitioners and beneficiaries should not be required to anticipate how extensive and unrelated information submitted years earlier could affect subsequent adjustment of status or consular processing.

These concerns are particularly serious for individuals who are unrepresented or who later change attorneys. Historical information provided on an I-130 may become difficult or costly to reconstruct, particularly when records must be obtained through Freedom of Information Act (FOIA) requests or other means.

The undersigned organizations respectfully urge USCIS to withdraw the proposed revisions to Form I-130 and retain the current form.

Family-based immigration should not be made unnecessarily complex or burdensome through an expanded information collection that exceeds the legal purpose of the petition. USCIS should ensure that the I-130 remains focused on the statutory and regulatory requirements: whether the petitioner is eligible to file and whether the requisite qualifying relationship exists.

For these reasons, we respectfully urge USCIS to withdraw the proposed revisions to Form I-130. For any questions related to this comment, please contact the Immigrant Legal Resource Center at rgodinez@ilrc.org.

Respectfully submitted,

ALMA

American Gateways

Asian Americans Advancing Justice -
AAJC

Asian Counseling and Referral Service

Asian Law Alliance

Asian Law Alliance

Ayuda

Canal Alliance

Catholic Charities of Santa Clara County

Catholic Legal Immigration Network, Inc.

Center for Law and Social Policy (CLASP)

Centro Binacional Para El Desarrollo
Indígena Oaxaqueño

Chinese for Affirmative Action

Civic Empowerment Coalition

Coastside Hope

CRLA Foundation

East Bay Sanctuary Covenant

Emerald Isle Immigration Center

Empowering Pacific Islander Communities
(EPIC)

FIRM - Fresno Immigrant and Refugee
Ministries

Florida Immigrant Coalition

GWP Immigration Law
HANA Center
Hands United
Holman Cahill
Houston Immigration Legal Services
Collaborative
Illinois Coalition for Immigrant and
Refugee Rights
Immigrant Center Project (ICSB, INC)
Immigrant Defenders Law Center
(ImmDef)
Immigrant Hope Gainesville
Immigrant Law Center of Minnesota
Immigration Center at Western Oaks
Immigrant Legal Resource Center (ILRC)
International Refugee Assistance Project
(IRAP)
JFCS East Bay
Jubilee Immigration Advocates
Just Detention International
Khmer Maine
Labor Council for Latin American
Advancement (LCLAA)
Law Foundation of Silicon Valley
Maria I. Lopez Immigration Law LLC
Michigan Immigrant Rights Center
National Council of Asian Pacific
Americans (NCAPA)
National Immigrant Justice Center
National Immigration Project
National Partnership for New Americans
National Tongan American Society
Naturalization Network
New American Pathways

Northwest Immigrant Rights Project
Pascual Law, PLLC
Project Unidad
Services, Immigrant Rights and Education
Network (SIREN)
Sikh American Legal Defense and
Education Fund (SALDEF)
Social Justice Collaborative
Southeast Asia Resource Action Center
(SEARAC)
Step Forward Foundation
Survivor Justice Center
The Advocates for Human Rights
The Leadership Conference on Civil and
Human Rights
The Workers Circle
UFW Foundation
UnidosUS
United Community
United Parent Leaders Action Network
World Relief SoCal