

On May 7, 2026, the Department of Homeland Security’s U.S. Citizenship and Immigration Service posted a Paperwork Reduction Act Notice in the [Federal Register](#) that adds public benefit questions to its change of address form. This is a proposal and is not yet final. The proposal is seeking the public’s comments on these changes.

People [required to register](#) with USCIS under the [Trump immigrant registration requirement](#)<sup>1</sup> must file a change of address form (AR-11) within 10 days of moving. This is known as the “federal registry requirement.” In addition, noncitizens with pending applications before USCIS or those with approved visa petitions must file a change of address soon after moving so they can continue receiving important information pertaining to their case.

The [proposed revisions to Form AR-11](#) would require people subject to [federal registry requirements](#) to report whether they have used a means-tested public benefit defined as a “public benefit for which the Federal state or local agency granting the benefit considers eligibility for the benefit, the amount of the benefit, or both, is based on a person’s income and resources [sic].” The form:

- Lists a number of specific benefits for which a yes/no response is provided, including: SNAP, Medicaid, SSI, TANF, CHIP, WIC, Section 8 Housing Assistance (both Housing Choice Voucher Program and Project-Based Rental Assistance including Moderate Rehabilitation), any other federal cash or non-cash assistance, and state or local means-tested public benefits.
- Requires individuals to provide information for each time they received the benefit, the monthly and annual amount, and payment frequency, and start and end dates, and says that USCIS may verify whether they provided accurate information to the public benefit granting agency.
- Provides additional space to provide information about additional benefits not specifically listed.

For the first time, the form asks people subject to federal registry requirements not only for their own mailing and street address, but also for the name and address of both their employer and any school they are attending. It also includes a request for many pieces of information that

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<sup>1</sup> The Trump administration is using a World War II-era law to try to make immigrant families give their personal information, including their addresses, to immigration officials. This process is called registration. The Department of Homeland Security (DHS) has said that [the goal](#) of registration is to find and deport undocumented immigrants who register, or pressure them to leave the U.S. on their own. DHS has also [threatened](#) that people who don’t register could face criminal charges and has suggested that families leave the United States on their own to avoid being deported or prosecuted. For more information, see, the National Immigration Law Center, “FAQ: The Trump Immigration Registration Requirement,” April 10, 2025, <https://www.nilc.org/resources/faq-the-trump-immigration-registration-requirement/>

USCIS should already have, including, when an individual's stay in the US will expire and receipt numbers for all their immigration benefit requests.

USCIS says it would use the information to:

- Enforce immigration laws including the public charge ground of deportability
- Identify people who may be using means-tested benefits in violation of federal eligibility rules
- Coordinate with means-tested public benefit granting agencies to enforce eligibility restrictions

If people subject to registration requirements do not file the form and provide all the required information within 10 days, they may face severe consequences. They are subject to a misdemeanor charge punishable by a fine of up to \$5,000 or imprisonment for up to 30 days, or both. In addition, anyone who has failed to comply with the registration requirement is deportable unless they establish that the failure was excusable or not willful.

The agency also states that one of the reasons for changing the AR-11 is to assess whether someone is deportable for public charge grounds. Only refugees, lawful permanent residents, and those who have been admitted to the U.S. with a visa are subject to the grounds of deportability. The public charge ground of deportability requires the federal government to prove that a person has become a public charge within five years of entry and that the circumstances that lead to the person becoming a public charge arose before the person entered the United States or adjusted status to lawful permanent residence. There are restrictions as to the means-tested benefits that can be used by the government to pursue public charge deportability. However, the proposed version of the AR-11 is overly broad and does not draw this distinction, asking about many additional programs that have no bearing on public charge deportability. Further, there must be a charge or fee for the benefits or services rendered, the government must have sought reimbursement for any benefits paid out to the noncitizen, and the noncitizen must fail to repay in order to be deportable as a public charge. Overall, deporting someone on public charge grounds is difficult for the federal government to do, which is why it is not a common occurrence. More information on the public charge ground of deportability is available [here](#).

Although Form AR-11 is used for changes of address for both people subject to the federal registry requirement and for noncitizens with pending applications before USCIS, only those subject to the registry requirement are directed to provide information about their use of public benefits and the addresses of their schools or employers. Neither the form itself nor the instructions fully explain who is subject to the registration requirements, which will likely result in confusion and the sharing of this information by those who are not required to do so.

This information collection does not adhere to the Paperwork Reduction Act's mandate to reduce burden on the public. In fact, it adds burden, and it is important to communicate to the

government the impact this has on the public. Comments on this proposal are due on July 6, 2026.

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