

Global Immigration alert

March 2025

United States

DHS publishes Interim Final Rule elaborating on registration requirement for certain foreign nationals

Executive summary

The Department of Homeland Security (DHS) has announced the release of a new registration form for certain foreign nationals to monitor compliance with statutory requirements for alien registration and fingerprinting provisions. The Interim Final Rule (IFR) designates a general registration option available to all unregistered foreign nationals regardless of their status. This rule implements section 7 of [Executive Order](#) 14159, Protecting the American People Against Invasion, which seeks to safeguard national security and public safety through stricter enforcement of immigration laws.

The IFR announcing the new form is effective 11 April 2025, but states that foreign nationals may register using the revised G-325R Biographic Information (Registration) form immediately. The U.S. Citizenship and Immigration Services (USCIS) registration method requires creation of a profile on myUSCIS at <https://my.uscis.gov/>. Following submission of the G-325R and completion of a biometrics appointment (if required), "Proof of Alien Registration" will be available in the myUSCIS account, serving as evidence of registration. Detailed instructions are available on USCIS's [website](#).

The affected population includes all foreign nationals who are subject to the Immigration and Nationality Act (INA) registration requirements, currently unregistered, and present within the United States for more than 30 days. This group includes:

- Foreign nationals who entered the United States without inspection or were admitted temporarily and remained past the required departure date, if they do not already have a registration form and proof of registration
- Canadian visitors who entered at land ports of entry and were not issued evidence of registration (Form I-94)
- A foreign national, whether previously registered or not, who turns 14 years old in the United States and therefore must register within 30 days after their 14th birthday

Background and analysis

The INA authorizes the Secretary of Homeland Security to create forms for the registration and fingerprinting of foreign nationals and to establish special regulations and forms for specific classes of foreign nationals. To address gaps within the current registration procedures and improve law enforcement efficacy, DHS has determined that a general registration form in addition to existing statutory registration may improve registration outcomes.

The new form does not add registration or fingerprinting requirements beyond the following already in the INA:

- All registered and fingerprinted foreign nationals must receive a certificate of alien registration or an alien registration receipt card.
- Registered foreign nationals aged 18 and over must carry proof of alien registration or alien registration receipt card at all times. Noncompliance is a

misdeemeanor punishable by a fine of up to \$5,000, imprisonment for up to 30 days, or both.

- Foreign nationals required to register must also notify DHS in writing of any address changes within 10 days and provide additional information as needed. Noncompliance with the change-of-address notification requirements is a deportable offense unless proven the failure is reasonably excusable or not willful.

Acceptable registration forms include, but are not limited to:

- I-94, Arrival-Departure Record–Aliens admitted as nonimmigrants, including those issued Form I-94W (Visa Waiver Program), and Aliens paroled into the United States under 212(d)(5) of the INA
- I-95, Crewmen's Landing Permit–Crewmen arriving by vessel or aircraft
- I-181, Memorandum of Creation of Record of Lawful Permanent Residence–Aliens presumed to be lawfully admitted to the United States under 8 CFR 101.1
- I-485, Application for Status as Permanent Resident–Applicants under sections 245 and 249 of the INA as amended, and section 13 of the Act of September 11, 1957
- I-590, Registration for Classification as Refugee–Escapee–Refugee-escapees paroled pursuant to section 1 of the Act of July 14, 1960
- I-817, Application for Voluntary Departure under the Family Unity Program

DHS distinguishes between forms that satisfy registration requirements and forms that constitute evidence of registration that must be carried at all times. Proof of registration includes, but is not limited to:

- I-94, Arrival-Departure Record–Aliens admitted as nonimmigrants
- I-95, Crewmen's Landing Permit–Crewmen arriving by vessel or aircraft
- I-184, Alien Crewman Landing Permit and Identification Card–Crewmen arriving by vessel
- I-185, Nonresident Alien Canadian Border Crossing Card–Citizens of Canada or British subjects residing in Canada
- I-186, Nonresident Alien Mexican Border Crossing Card–Citizens of Mexico residing in Mexico
- I-551, Permanent Resident Card–Lawful permanent resident of the United States
- I-766, Employment Authorization Document (EAD)

Additionally, a valid, unexpired nonimmigrant DHS admission or parole stamp in a foreign passport constitutes evidence of registration.

The registration form requests the following biographic information:

- Full name
- Date and place of birth
- Current address and contact information
- Date and place of entry into the United States
- Immigration status (if applicable)
- Criminal history (if applicable)

Foreign nationals who have previously registered already meet the requirement and do not need to re-register. This includes:

- Lawful permanent residents
- Paroled foreign nationals under INA 212(d)(5)
- Foreign nationals admitted to the U.S. as non-immigrants and were issued form I-94 or I-94W
- All foreign nationals present in the U.S. who were issued immigrant or non-immigrant visas prior to arrival
- Foreign nationals whom DHS has placed in removal proceedings
- Foreign nationals issued an EAD
- Foreign nationals who have applied for lawful permanent residence using Forms I-485, I-687, I-691, I-698, I-700, even if denied
- Foreign nationals who have been issued Border Crossing Cards

Further, registration is not required for individuals holding A or G visas or foreign nationals who are American Indians born in Canada and possessing at least 50% of American Indian heritage.

Failure or refusal to apply for registration or to be fingerprinted may result in a fine of up to \$5,000, imprisonment for up to six (6) months, or both. Additionally, fraudulent registration is grounds for deportation.

What this means

The Alien Registration Form (G-325R) provides an additional online method for foreign nationals visiting or residing in the United States to comply with statutory registration requirements. Individuals who complete the registration process can avoid penalties and secure "Proof of Alien Registration."

Those who have previously registered already meet the requirement and do not need to re-register. Exempt individuals are not required to register but may do so voluntarily. All foreign nationals remain subject to ongoing change of address reporting requirements.

We will continue to monitor and share future developments. For additional information, or if you wish to discuss this further, please contact your EY Law LLP professional or Mehlman Jacobs LLP professional.

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