

PRACTICE ALERT: USCIS REGISTRATION REQUIREMENT

Last reviewed on April 22, 2025

Dear pro bono partner,

You and your clients may have heard about the new registration requirements for immigrants released by the Trump administration called the “[Alien Registration Requirement](#)”. This requirement is set to go into effect on April 11th, 2025. We are contacting you in order to assist you in determining whether your client is exempt from registration at this time.

If your client is already in removal proceedings or has obtained a valid Employment Authorization Document (EAD card or work permit), your client **is already considered registered**, and no further action is required at this time. Please note that a mere *application* for an EAD card is not sufficient. Your client has to have *received* the EAD card in order to be considered registered. Even if this card is now expired, they are still considered registered as they will have submitted their biometrics information in order to obtain this card.

USCIS will consider that your client is already registered if they are in one of the following categories:

- Lawful permanent residents;
- Aliens paroled into the United States under INA 212(d)(5), even if the period of parole has expired;
- Aliens admitted to the United States as nonimmigrants who were issued Form I-94 or I-94W (paper or electronic), even if the period of admission has expired;
- All aliens present in the United States who were issued immigrant or nonimmigrant visas before their last date of arrival;
- Aliens whom DHS has placed into removal proceedings;
- Aliens issued an employment authorization document;
- Aliens who have applied for lawful permanent residence using Forms I-485, I-687, I-691, I-698, I-700, and provided fingerprints (unless waived), even if the applications were denied; and
- Aliens issued Border Crossing Cards.

If your client ***is considered registered*** under one of the categories above, **they MUST carry proof of registration on them at all times**. If your client was previously issued an EAD card, they must carry this card with them to show proof of registration, even if the card is expired.

If they are in removal proceedings, they must carry a copy of the NTA with them. If they are a green card holder, they must carry their green card.

Please also see our other [practice advisory](#) on what other documents they should carry with them.

If your client **does not** fall within one of the categories above, then they **are not considered registered, and you must contact your Immigration Equality mentor as soon as possible.** Failing to register could lead to serious criminal and immigration consequences and your mentor will advise you on the potential risks moving forward.

Address Changes

Please note that, if your client moves, your client must update USCIS with their address in order to keep their registration up to date. Please be warned that failure to comply with the requirement to update addresses may lead to criminal penalties and may also make the client deportable under INA 237(a)(3)(A).

If your client is relying on an EAD as their proof of registration, and if their address has changed since the EAD application was submitted or issued, they must report this change of address to be in compliance with the registration requirement. Otherwise, they will not be considered to be registered. Similarly, if your client's current address is different from the address that USCIS or EOIR have on file for your client, your client must submit a change of address. If you are unsure of which address USCIS or EOIR has on file for your client, we are recommending that your client proactively submit change of address forms. Remember that lawful permanent residents are also required to update their address with USCIS.

If your client has registered with USCIS or already has a USCIS account, they can file an AR-11 change of address electronically using this account to keep their address up to date. They should keep proof that they have filed a change of address with USCIS. Here is a helpful video on how to complete a change of address online: <https://www.youtube.com/watch?v=dVxmhxYnZcE>.

If your client is in removal proceedings and does not have a USCIS account, it is possible for them to create an account and file an AR-11 change of address via this portal. For more information on this, please visit <https://myaccount.uscis.gov/create-account> and refer to the video linked above. It is also possible to file an AR-11 on paper by mail with USCIS. However, they must retain proof of mailing and delivery if they are filing by mail. For all clients in removal proceedings, this means that, when they move, they will now have to file an EOIR-33 with EOIR, serve it on ICE and update their address with USCIS in order to keep their registration current.

Please note that attorneys have reported issues when trying to update their clients' address online using their attorney accounts. If your client wishes to submit the change of address electronically, we recommend that attorneys help their clients submit the change of address form via their clients' accounts.

If you or your client are having trouble with a USCIS account, login or otherwise, please contact USCIS tech support directly as Immigration Equality is not able to assist in troubleshooting online account errors at this time.

We thank you for your continued work and support in these challenging times.

The Asylum Legal Team at Immigration Equality