

Global Immigration alert

May 2026

United States

USCIS proposes new information collection for change of address form

Executive summary

On 7 May 2026, U.S. Citizenship and Immigration Services (USCIS) published a 60-day notice proposing to reinstate, with changes, a previously approved information collection for Form AR-11, Alien Change of Address. USCIS is proposing to require foreign nationals subject to registration and change of address reporting obligations to disclose information relating to receipt of means-tested public benefits, as well as their employment or schooling.

The public comment period is open until 6 July 2026.

Background and analysis

The *Immigration and Nationality Act* (INA) requires most foreign nationals in the United States to report a change of address to USCIS within 10 days of moving. This obligation is commonly satisfied by filing Form AR-11, either online through a USCIS account or by mail. Historically, the change of address reporting requirement has been intended to keep USCIS records current and support compliance with registration laws. Failure to comply may carry immigration consequences under existing law.

The proposal published on 7 May would expand the scope of information collected through Form AR-11. In addition to updated address details, foreign nationals would be required to disclose:

- Information regarding receipt of any means-tested public benefits
- Information related to current employment or schooling

While the agency is not proposing to create a new requirement to report a change of address, the proposed reinstatement would materially expand the information required as part of the existing mandatory filing consistent with the government's authority to deny certain immigration benefits to foreign nationals who are likely to become a public charge.

What this means

USCIS states that these proposed changes aim to support public charge enforcement and compliance with existing benefit restrictions. If these changes are implemented, errors, omissions, or inconsistencies in AR-11 filings may carry greater risk if the information is used for enforcement or eligibility assessments.

US employers may wish to reiterate the importance of timely and accurate address updates to their foreign national employee populations. Foreign nationals who have received, or believe they may be eligible for, means-tested public benefits should consider seeking legal guidance before submitting information to USCIS to better understand their obligations and potential implications under US immigration law.

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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