

**CENTER FOR
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INSIGHTS**

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July 1, 2026

Submitted via regulations.gov

Office of Policy & Strategy
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

RE: Signatures on Immigration Benefit Requests; U.S. Citizenship and Immigration Services/DHS Docket No. USCIS–2026–0166

Dear Sir or Madam:

The Center for Strategy and Applied Insights at Fragomen (the “Center”) respectfully submits this comment on the Department of Homeland Security’s (DHS) Interim Final Rule (IFR), *Signatures on Immigration Benefit Requests*.¹

The IFR seeks to clarify how U.S. Citizenship and Immigration Services (USCIS) handles invalid signatures on immigration benefit requests. The IFR provides that “USCIS adjudicators may, in their discretion, reject or deny a request” with a missing or improper signature.² If denied, USCIS would retain the filing fee and treat the benefit request as fully adjudicated.³ The IFR’s stated aim is to enforce signature requirements more consistently, reduce improper filings, and protect the integrity of the adjudication process.⁴

¹ *Signatures on Immigration Benefit Requests*, 91 Fed. Reg. 25479 (May 11, 2026) (interim final rule) (to be codified at 8 C.F.R. § 103).

² *Id.*

³ *Id.*

⁴ *Id.* at 25480.

The IFR's objectives are important, but they cannot be achieved through consequences alone. Consistent enforcement requires standards that are clear enough for requestors to follow and practical enough for USCIS to administer efficiently. The IFR leaves the underlying signature framework largely unchanged even as it makes signature errors more consequential. A more durable approach would clarify acceptable signatures and permit secure electronic and digital methods where appropriate, reducing avoidable errors while preserving agency resources for substantive eligibility and fraud concerns.

This comment makes three principal points. First, the IFR imposes severe consequences for technical signature defects without modernizing the outdated signature rules that produce them, despite the relatively minor scale of the problem, and without explaining why existing anti-fraud tools are insufficient. Second, DHS has not shown that the IFR is a procedural rule exempt from the Administrative Procedure Act (APA) notice and comment requirement. Third, the IFR is arbitrary and capricious because it fails to address the Center's Petition for Rulemaking, which proposed a workable alternative directly responsive to the problem USCIS seeks to solve.

I. The IFR Imposes Penalties Without Modernizing Signature Rules

A. DHS Applies Stricter Penalties Without Clarifying Signature Requirements

The IFR imposes harsher consequences for signature defects without updating the outdated rules that create them. In doing so, it prioritizes enforcement over clarity and exposes routine filings to denial without clear standards for compliance.

Current policy reflects a patchwork approach to signatures. DHS explains that existing regulations recognize a "handwritten" signature for most filings, while permitting electronic signatures only in limited online filing contexts as specified in form instructions. At the same time, USCIS generally accepts scanned, copied, or faxed reproductions of an originally signed benefit request. In practice, USCIS distinguishes among wet signatures, reproduced signatures, and limited electronic signatures without clearly defining the boundaries of each category.

The IFR expands adjudicator discretion without defining what renders a signature invalid. Under the IFR, USCIS may deny the immigration benefit request based on an invalid signature at any point in the adjudicatory process. The preamble highlights examples such as pasted signatures or signatures applied to multiple filings.⁵ It also references broader categories including stamped signatures or signatures created using software.⁶ Yet DHS acknowledges that current intake systems cannot reliably identify these issues, and does not explain whether those systems have been updated to support the expanded discretion it grants to adjudicators.

⁵ IFR at 25482.

⁶ *Id.*

Expanding discretion without clear standards or corresponding process improvements invites arbitrary and inconsistent outcomes. If USCIS intends to rely more heavily on signature validity as a basis for denial, both requestors and adjudicators need clearer standards and more reliable tools for identifying problematic signatures consistently.

This lack of clarity is particularly problematic because it sweeps in common, good-faith signature practices used across routine legal and business filings. Large organizations often designate an authorized signatory to execute high volumes of immigration filings, using standardized signature blocks for efficiency and consistency. In such settings, multiple filings may bear visually identical signatures or identical placement. Similarly, in routine filings, a signatory executes a form by hand, and a scanned copy of that signed page is transmitted to counsel for assembly and filing. It is also common for corporate officers to sign hundreds of immigration forms to have highly consistent signatures that appear nearly identical across filings. If a minor clerical correction is later made, such as fixing a typographical error or updating a date, the previously signed page may be incorporated into the corrected filing to avoid delay. These standard practices are common and do not suggest fraud. Yet the IFR's reference to signatures applied across multiple filings could be read to encompass these scenarios, creating a risk that routine corporate practices are treated as suspect without clear standards of what is acceptable.

B. DHS Has Not Shown a Problem Requiring Expanded Denial Authority

DHS has not demonstrated that signature defects occur at a frequency that justifies expanded denial authority. The IFR cites an annual average number of 1,192 denials for signature-related reasons, an extremely small share of USCIS's roughly 13 million receipts in Fiscal Year 2025, representing less than one-hundredth of a percent of annual receipts.⁷ The IFR does not explain how many of these denials involved fraud, intentional misconduct, or other circumstances that could not have been addressed through existing rejection procedures. DHS should distinguish between clerical errors and fraud, explain why existing intake rejection processes and post-receipt tools are insufficient, and justify why more proportionate alternatives were not adopted. Without that explanation, the rule is disproportionate to the scale of the problem it seeks to address.

C. DHS Already Has Adequate Tools to Address Fraud and Improper Filings

Even if DHS had demonstrated a meaningful fraud concern, it has not shown why existing statutory, regulatory, and adjudicative tools are inadequate to address it. Current regulations and policies authorize USCIS to deny and pursue enforcement where fraud or willful misrepresentation is found. USCIS can issue Requests for Evidence or Notices of Intent to Deny where clarification is needed, and to refer cases for investigation where warranted. Moreover,

⁷ *Id.* at 25483.

current intake processes already permit USCIS to reject improperly signed filings at the outset, allowing requestors to correct technical deficiencies without prejudicing eligibility. Rather than clarifying signature standards and improving its ability to distinguish clerical errors and fraud, the IFR imposes harsher consequences without a demonstrated need.

D. The IFR Imposes Disproportionate Consequences for Technical Errors

The IFR authorizes denial and fee retention even when a signature defect is technical rather than substantive. These consequences are significant. A denial may result in loss of a filing date, missed eligibility windows, repayment of substantial filing fees, or the loss of access to capped or time-sensitive benefits. These outcomes are disproportionate where the underlying issue is a technical error rather than fraud or ineligibility.

These consequences are especially severe in time-sensitive and numerically limited filings. For example, where an H-1B cap petition is denied months after the filing period ends, a petition cannot be refiled, the selected registration is forfeited, and the opportunity is lost for that fiscal year. A denial may also cause a loss of lawful status or work authorization, potentially exposing beneficiaries to accrual of unlawful presence and employers to business disruption. Additionally, in cases involving the Child Status Protection Act, where eligibility depends on the age at the time of filing, a denial months after receipt could foreclose the opportunity to obtain the benefit altogether. Filings tied to expiring eligibility periods, priority dates, or regulatory deadlines are all at risk when there is no possibility to cure and refile once the application is denied and deemed fully adjudicated.

DHS acknowledges that “many USCIS benefit requests involve filing deadlines that have major ramifications if missed,” yet despite recognizing “the loss of the fee, gain of an appeal, completion of a new form, and payment of a new fee following a denial,” it concludes rejection and denial have the same impact.⁸ These differences are material. DHS acknowledges them but does not meaningfully account for them, rendering its analysis incomplete.

DHS suggests that a planned shift toward electronic filing may reduce these issues over time. But as long as paper filings remain permitted, requestors continue to be subject to the unclear and outdated signature rules that govern those filings. The IFR imposes harsher penalties within that existing system without resolving its underlying deficiencies.

II. The IFR Fails to Justify an Exception from the Notice and Comment Requirement

DHS relies on the APA’s procedural-rule exception, but the IFR changes far more than agency process. By replacing rejection and correction with denial and fee retention, the rule materially

⁸ *Id.* at 25485.

changes the consequences of filing errors and therefore cannot be characterized as merely procedural.

The APA provides that "rules of agency organization, procedure, or practice" are exempt from the general notice and comment requirements.⁹ Although the IFR is labeled as procedural, its effects go beyond internal agency administration. The rule authorizes USCIS to deny benefit requests with deficient signatures, rather than reject and allow for the opportunity to cure the defect. That choice, as noted above, carries significant real-world consequences. A rule that alters those practical and legal stakes cannot be treated as insignificant merely because it concerns signatures or filing requirements.

A rule is not procedural, regardless of how it is labeled, if it substantially affects regulated parties' rights or interests.¹⁰ Procedural rules alter only "the manner in which parties present themselves or their viewpoints to an agency."¹¹ Here, the IFR goes further: it changes the consequences of a signature defect by authorizing denial, fee retention, loss of filing dates, and the potential inability to refile in time-sensitive settings.

DHS maintains that the IFR merely codifies existing policy and therefore would have no impact on requestors.¹² However, USCIS has historically rejected filings for signature defects, allowing correction and refile. Even DHS acknowledges that "a denial, as compared to a rejection, may impose an additional burden on requestors to complete a new request and pay a new fee." These are not "incidental burdens"; they are material consequences that alter substantive rights.¹³ Because the rule has substantial real-world consequences, it cannot be treated as procedural and requires notice and comment.

III. The IFR is Arbitrary and Capricious Because DHS Failed to Address the Center's Petition for Rulemaking

The IFR is arbitrary and capricious because DHS did not meaningfully engage with the Center's Petition for Rulemaking, which proposed a directly responsive and administrable alternative to the problem the IFR seeks to address.

⁹ 5 U.S.C. § 553(b)(A).

¹⁰ See *American Hosp. Ass'n v. Bowen*, 834 F.2d 1037, 1047 (D.C. Cir. 1987) and *Batterton v. Marshall*, 648 F.2d 694, 703 (D.C. Cir. 1980) (distinguishing procedural rules that impact an agency's internal operations from rules that alter substantive rights and interests of regulated parties); but see *JEM Broad. Co. v. FCC*, 22 F.3d 320, 326–27 (D.C. Cir. 1994) (explaining that the procedural-rule inquiry turns on the degree of the rule's practical impact on regulated parties).

¹¹ *Batterton*, 648 F.2d at 707.

¹² IFR at 25485.

¹³ Remarkably, DHS "estimates that [the IFR] will not result in a direct cost to USCIS or to an individual requestor." *Id.*

In November 2025, the Center submitted a Petition requesting that DHS and USCIS amend 8 C.F.R. § 103.2(a)(2) to clarify that electronic and digital signatures may be accepted on immigration benefit requests. The Petition included specific regulatory text and explained how it would improve efficiency, reduce administrative burden, and strengthen document security.

The Petition explained that electronic and digital signatures are already widely used in commercial, legal, and governmental transactions, are recognized under federal law, and in many cases provide greater reliability, traceability, and protection against tampering than handwritten signatures.

DHS denied the Petition on the same day the IFR was issued, asserting that rulemaking in this area would be “an inefficient use of resources.” That rationale cannot be reconciled with DHS’s actions. While the Petition denial states that “it does not make sense to expend resources to promulgate regulations” regarding signature rules, DHS is regulating signature validity in this IFR as well as simultaneously pursuing rulemaking on mandatory electronic filing.¹⁴ These actions confirm that DHS is actively regulating in this area, undermining its stated justification for rejecting the Petition. At minimum, the simultaneous publication of the IFR and denial of the Petition required DHS to explain why stricter enforcement consequences were warranted while modernization of the underlying signature framework was not.

When an agency is presented with a rulemaking petition addressing the precise regulatory issue under consideration, it must at minimum provide a reasoned response explaining acceptance, rejection, or deferral.¹⁵ Here, the issue is not whether DHS has resources or authority to regulate signatures, but why it chose to regulate penalties while declining to clarify the underlying rules that create the defects it seeks to prevent.

The simple amendment to the regulatory text proposed in the Petition, authorizing USCIS to permit electronic and digital signatures on the form instructions, offered a clear and administrable alternative solution that USCIS was required to consider as part of the administrative record. These are precisely the kind of record-based considerations an agency must grapple with when regulating signature validity and its consequences. An agency acts arbitrarily where it fails to consider an important aspect of the problem, including reasonable alternatives reflected in the administrative record.

¹⁴ Mandatory Electronic Filing (e-Filing), RIN 1615-AD19, Office of Mgmt. & Budget, Office of Info. & Regulatory Affairs, Pending Review (received May 19, 2026), <https://www.reginfo.gov>.

¹⁵ *Massachusetts v. EPA*, 549 U.S. 497, 534-35 (2007) (explaining that when an agency denies a rulemaking petition, it must provide a reasoned explanation).

IV. Recommendation and Conclusion

The Center urges DHS to withdraw the IFR or suspend its implementation. DHS should instead initiate rulemaking to address signature validity and enforcement consequences in a single, coherent, and proportionate framework, following the APA's notice and comment requirement and considering the full administrative record, including the Center's Petition.

A modernized approach that clarifies acceptable signatures and aligns signature requirements with current technology would better address the problem USCIS is trying to solve while avoiding disproportionate penalties for technical errors.

Respectfully,

Center for Strategy and Applied Insights at Fragomen



Leah Rogal
Senior Director



K. Edward Raleigh
Managing Fellow

Attachments:

1. Center for Strategy and Applied Insights' Petition for Rulemaking (October 31, 2026)
2. DHS Response to Petition for Rulemaking (May 11, 2026)

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October 31, 2025

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245 Murray Lane SW
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U.S. Citizenship and Immigration Services
Office of Policy & Strategy, Regulation Coordination Division
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: **Petition for Rulemaking: Digital and Electronic Signatures**

Dear Madam or Sir:

The Center for Strategy and Applied Insights at Fragomen hereby submits the enclosed Petition for Rulemaking, asking the Department of Homeland Security and U.S. Citizenship and Immigration Services to promulgate regulations permitting digital and electronic signatures on benefit request forms. This Petition for Rulemaking is submitted in accordance with 5 U.S.C. § 553(e) and with respect to DHS, the process set forth for such petitions under 6 C.F.R. Part 3.

Respectfully,

Center for Strategy and Applied Insights at Fragomen



Leah Rogal
Senior Director



K. Edward Raleigh
Managing Fellow

**PETITION FOR RULEMAKING
TO PROMULGATE REGULATIONS GOVERNING
DIGITAL AND ELECTRONIC SIGNATURES**

SUBMITTED TO

**THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY AND
UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES**

OCTOBER 31, 2025

CENTER FOR STRATEGY AND APPLIED INSIGHTS AT FRAGOMEN

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I. INTRODUCTION

As technology has advanced, it has opened new ways of signaling review, agreement, and responsibility that are far more secure and efficient than the traditional handwritten signature. These new digital and electronic signature formats have been widely recognized and embraced in countless serious and high-stakes contexts: by government agencies, medical institutions, financial institutions, commercial actors, and countless other kinds of enterprises. With the press of a button or the mark of a stylus, humans can bind themselves or their companies, make attestations, and authorize transactions in a way that is secure, traceable, and durable. Wet signature requirements, thought out and established before digital and electronic options became so widely adopted, do not today make full use of new technological capabilities. With the simple regulatory change proposed here, the Department of Homeland Security (DHS) and U.S. Citizenship and Immigration Services (USCIS) could strengthen the integrity of the filings it receives and create enormous efficiencies for petitioners, applicants, and the agency itself.

II. STATEMENT OF PETITION

The Center for Strategy and Applied Insights at Fragomen (Center) hereby petitions DHS and USCIS to initiate rulemaking proceedings pursuant to the Administrative Procedure Act, 5 U.S.C. §553(e), to clarify that digital and electronic signatures are permitted on USCIS forms.

Under the Homeland Security Act of 2002, Congress established DHS and transferred the functions of the former Immigration and Naturalization Service (INS) to DHS, effectively restructuring the federal immigration system. Section 451 of the Act (6 U.S.C. § 271) created USCIS and vested it with the responsibility for adjudicating immigration and naturalization benefits. Although the Secretary of Homeland Security retains overarching authority for immigration policy and enforcement, the Director of USCIS has the authority to administer and enforce the immigration laws as they pertain to the adjudication of benefits. This includes the authority to grant or deny applications and petitions, conduct interviews, and issue related guidance and regulations.

With respect to the signature requirement on USCIS forms, the regulations at 8 C.F.R. 103.2(a)(2), provide as follows:

An applicant or petitioner must sign his or her benefit request. However, a parent or legal guardian may sign for a person who is less than 14 years old. A legal guardian may sign for a mentally incompetent person. By signing the benefit request, the applicant or petitioner, or parent or guardian certifies under penalty of perjury that the benefit request, and all evidence submitted with it, either at the time of filing or thereafter, is true and correct. Unless otherwise specified in this chapter, an acceptable signature on a benefit request that is being filed with the USCIS is one that is either handwritten or, for benefit requests filed

electronically as permitted by the instructions to the form, in electronic format.

USCIS does not require forms to contain a “wet” signature; rather it accepts forms containing a photocopy of the original signature. As noted in the USCIS policy manual, “[t]he regulations do not require that the person signing submit an ‘original’ or ‘wet ink’ signature on a petition, application, or other request to USCIS.” Forms filed online, through a myUSCIS account, are “signed” electronically through the system.

The USCIS policy manual provides, in relevant part:

A valid signature consists of any handwritten mark or sign made by a person to signify the following:

- The person knows of the content of the request and any supporting documents;
- The person has reviewed and approves of any information contained in such request and any supporting documents; and
- The person certifies under penalty of perjury that the request and any other supporting documents are true and correct.

A valid signature does not need to be legible or in English, and may be abbreviated as long as this is consistent with how the person signing normally signs his or her name. A valid signature does not have to be in cursive handwriting. A person may use an “X” or similar mark as his or her signature. A signature is valid even if the original signature on the document is photocopied, scanned, faxed, or similarly reproduced. Regardless of how it is transmitted to USCIS, the copy must be of an original document containing an original handwritten signature, unless otherwise specified. The regulations do not require that the person signing submit an “original” or “wet ink” signature on a petition, application, or other request to USCIS.

When determining whether a signature is acceptable, officers should review any applicable regulations, form instructions, and policy to ensure that the signature on a particular benefit request is proper. USCIS does not accept signatures created by a typewriter, word processor, stamp, auto-pen, or similar device.

For benefit requests filed electronically as permitted by form instructions, USCIS accepts signatures in an electronic format. Benefit requestors must follow the instructions provided to properly sign electronically.

This petition proposes that USCIS amend its regulations to clarify that forms, whether filed on paper or online, may be signed electronically or digitally.

III. INTEREST OF PETITIONER

Drawing on lessons learned from the Fragomen firm's long experience as an immigration advisor to employers in the United States and around the world, the Center seeks to identify and analyze issues and trends key in immigration systems in the United States and around the world, and to offer insight-based suggestions to help those systems function fairly, transparently, and efficiently. As electronic and digital signatures have become standard practice, including in transactions with U.S. government agencies, the Center urges USCIS to explicitly confirm that such signatures are accepted on its forms. Doing so would reduce administrative burdens for the agency, improve accessibility and efficiency for benefit requestors, and strengthen the integrity and security of submitted documents.

IV. EXPLANATION OF NEED FOR THE PROPOSED RULE

Digital and electronic signatures are widely used in secure communications, electronic contracts, and government filings, and are legally recognized in the United States pursuant to the Electronic Signatures in Global and National Commerce Act (ESIGN Act), Pub. L. No. 106-229, 114 Stat. 464 (2000) (codified at 15 U.S.C. §§ 7001–7031).

Digital and electronic signatures offer enhanced security compared to wet signatures. Wet signatures can be forged, scanned, copied, intercepted in email, or tampered with during physical transit, and they provide no inherent proof of who actually signed it. By contrast, digital or electronic signatures can create an auditable record of who signed, when, and through which verified identity, while maintaining encrypted document integrity throughout the process.

They are also far more efficient. Applications and petitions can be immediately signed electronically or digitally, facilitating their timely filing. This is particularly important for U.S. enterprises such as, for example, a hospital that needs to immediately hire a medical specialist during a health care crisis, or a small tech startup needing a key engineer with specialized knowledge who is essential to a federal infrastructure contract. The hospital or company employee who is authorized to sign would under current rules receive a draft in hard copy, containing sensitive personal and proprietary information, sign it in ink, and return it by overnight courier, exposing the signature and the contents of the petition. By contrast, a digital or electronic signature would allow for the petition to be signed immediately and securely.

Over the past few decades, the use of electronic and digital signatures has expanded at the speed of technology, becoming commonplace in a wide range of transactions, including multi-million dollar contracts, court filings, and banking documents. Many federal agencies, such as

the Executive Office for Immigration Review, the Securities and Exchange Commission, and the Internal Revenue Service, routinely accept digital or electronic signatures. USCIS itself currently permits electronic signatures for forms submitted through its online filing system. Authorizing the use of digital and electronic signatures for all forms, whether filed electronically or on paper, would enhance USCIS's operational efficiency, reduce administrative burdens, and support the agency's ongoing transition to a fully digital environment while also strengthening the integrity and security of submitted documentation.

V. EXPLANATION OF PROPOSED RULE

USCIS should adopt a regulation clarifying that digital and electronic signatures are acceptable, consistent with the instructions on specific forms. Such a rule would authorize, but not require, USCIS to accept digital and electronic digital signatures. The rule would thus preserve the agency's discretion to determine when and how signatures may be accepted, and allow the agency to adapt to any future technological advances. USCIS would issue form-specific guidance to identify where digital and electronic signatures would be most appropriate. For example, electronic and digital signatures should be accepted in the case of employment-based immigrant and non-immigrant petitions, which are signed by business executives and human resources personnel who routinely use these technologies in their professional transactions. Additionally, digital or electronic signatures should be accepted where the applicant will be interviewed in person, such as adjustment of status, naturalization, or visa applications, where signatures can be validated during the interview process.

VI. PROPOSED REGULATORY TEXT

TITLE 8 – ALIENS AND NATIONALITY

CHAPTER I – Department of Homeland Security

Subchapter B – Immigration Regulations

PART 103 – Submission and Adjudication of benefit requests.

Revise § 103.2 to read as follows:

§103.2 Signature. An applicant or petitioner must sign his or her benefit request. However, a parent or legal guardian may sign for a person who is less than 14 years old. A legal guardian may sign for a mentally incompetent person. By signing the benefit request, the applicant or petitioner, or parent or guardian certifies under penalty of perjury that the benefit request, and all evidence submitted with it, either at the time of filing or thereafter, is true and correct. Unless otherwise specified in this chapter, an acceptable signature on a benefit request that is being filed with the USCIS ~~is one that is either~~ **may be handwritten, or in digital**

or electronic format, ~~or, for benefit requests filed electronically as permitted by the instructions to the form, in electronic format.~~

VII. CONCLUSION

In light of the growing reliance on secure technological tools across both the public and private sectors, USCIS should update its regulations to clarify that digital and electronic signatures may be accepted. Such a rule would provide the agency with the flexibility to permit these signatures, where appropriate. This approach would not only enhance efficiency and accessibility for applicants and petitioners, but also reduce administrative burdens and strengthen the integrity and security of the forms submitted to USCIS. We respectfully urge USCIS to adopt this commonsense reform to align its practices with broader government and industry standards.



Homeland Security

May 11, 2026

Leah L. Rogal
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1101 15th Street NW, Suite 700
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Dear Ms. Rogal and Mr. Raleigh:

We have received your October 31, 2025 petition for rulemaking: Digital and Electronic Signatures. Your petition requests that the Department of Homeland Security (DHS) promulgate a regulation permitting digital and electronic signatures on immigration benefit request forms, regardless of whether filed by mail or online. For the reasons explained below, the Department of Homeland Security (DHS) respectfully denies your petition under 6 CFR 3.9.

DHS regulations at 8 CFR 103.2(a)(2) provide that an acceptable signature on a benefit request that is being filed with the USCIS is one that is either handwritten or, for benefit requests filed electronically as permitted by the instructions to the form, in electronic format.

U.S. Citizenship and Immigration Services (USCIS) continues to work to add forms to the list of those available to file online, in accordance with the direction by Congress to eliminate paper filings in program administration to the extent possible. *See*, Government Paperwork Elimination Act (GPEA), Public Law 105-277, tit. XVII, section 1703, 112 Stat. 2681, 2681-749 (Oct. 21, 1998) (codified at 44 U.S.C. 3504 note). GPEA defines electronic signature as "...a method of signing an electronic message that identifies and authenticates a particular person as the source of the electronic message; and indicates such person's approval of the information contained in the electronic message." An online submission offers a more secure experience for the benefit requestor than a paper application submitted by mail. USCIS currently offers guided electronic filing for 18 of its forms, six of which have been added in the last year alone. Additionally, USCIS has made 16 forms available for online filing through PDF Intake since USCIS enabled this form of intake in October 2024.

Considering the continued efforts to increase the number of forms available for online filing, for which electronic signatures are permitted pursuant to form instructions, and because online filing is more secure than filing by mail, DHS is denying your petition as an inefficient use of resources. As DHS is moving away from filings by mail, in accordance with Congress' direction, it does not make sense to expend resources to promulgate regulations to clarify rules around mailed filings. USCIS will, nonetheless, continue to review and analyze data in the area

of forms completion, intake, and benefit integrity and may revisit electronic signature capabilities in the future.

Thank you for your interest in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Markwayne Mullin", with a stylized flourish underneath.

Markwayne Mullin
Secretary