



## Week in Regulation

# DHS Cost-adding Trend Expands

DAN GOLDBECK | NOVEMBER 10, 2025

The ongoing government shutdown<sup>[1]</sup> is, of course, an inherently fiscal issue that has had [increasingly dramatic effects](#) across various government programs and economic sectors. In terms of federal regulatory action, however, an intriguing, counter-intuitive trend has developed over the past couple weeks. As the American Action Forum (AAF) previously explored [early last month](#), rulemaking activity had unsurprisingly all but dried up in the weeks immediately following the lapse in appropriations. But fast-forward to this past week, and - for the [second straight week](#) - the Department of Homeland Security (DHS) has published a rulemaking with substantial new costs. Across all rulemakings, federal agencies published roughly \$2.1 billion in total costs and added 4.7 million paperwork burden hours.

## REGULATORY TOPLINES

- Proposed Rules: 6
- Final Rules: 16
- 2025 Total Pages: 50,623
- 2025 Final Rule Costs: -\$74.1 billion
- 2025 Proposed Rule Costs: -\$625.9 billion

## NOTABLE REGULATORY ACTIONS

The most consequential rulemaking of the week was the DHS [proposed rule](#) regarding “Collection and Use of Biometrics by U.S. Citizenship and Immigration Services.” Following on a final rule on the same matter from the [previous week](#), this proposal seeks “to amend its regulations concerning the use and submission of biometrics in the administration and enforcement of immigration and naturalization laws and the adjudication of any immigration

application, petition, or benefit or any other related request or collection of information.” The changes this proposed rule makes, and specifically their economic effects, are an order of magnitude higher than those in that preceding final rule, with total costs adding up to roughly \$2 billion over a 10-year horizon. Furthermore, DHS includes updated estimates of administrative burdens for more than [50 relevant paperwork requirements](#). Compared to the currently estimated time burdens for these requirements, this proposed rule would increase the time burden by 4.5 million hours each year.

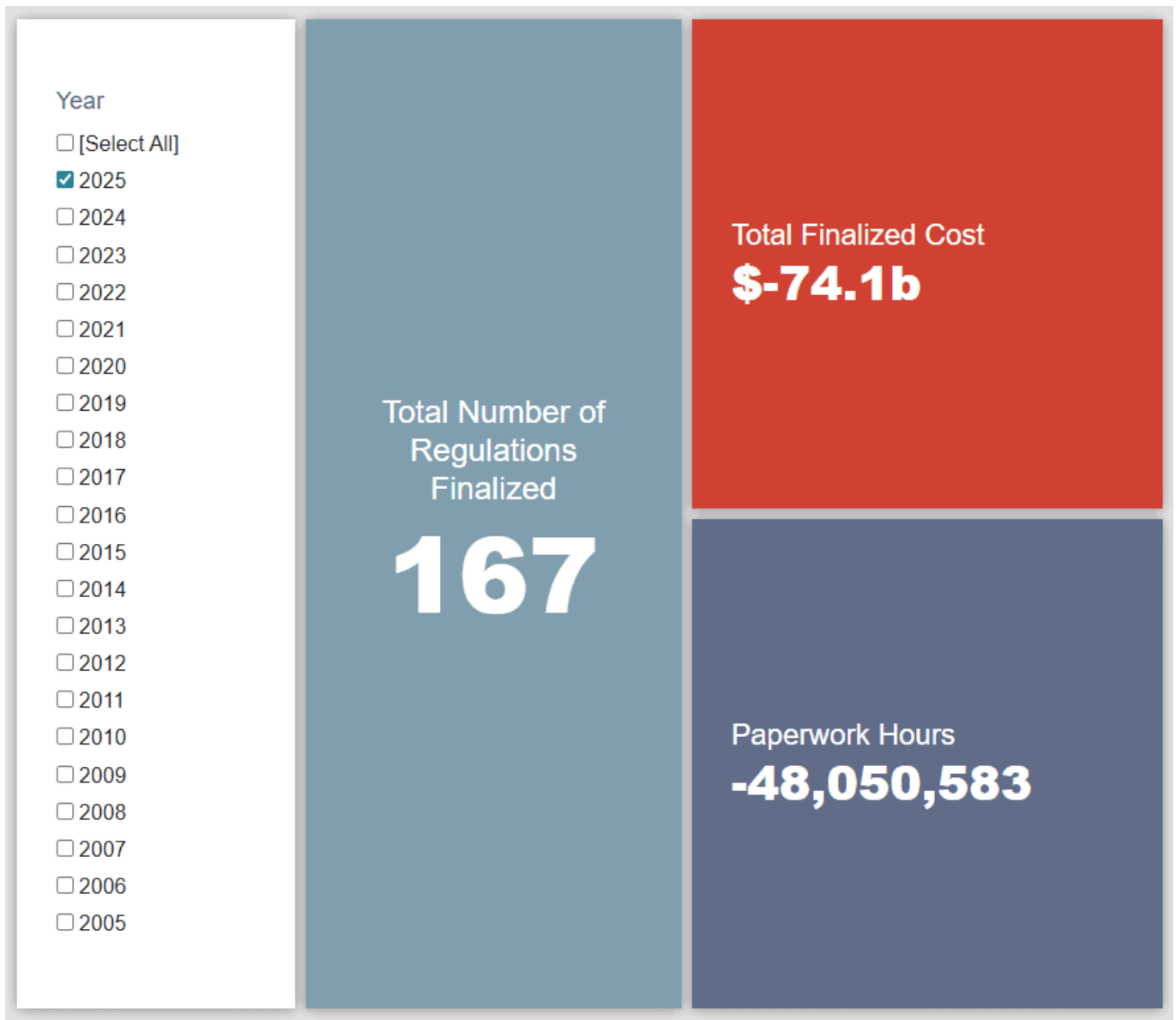
## **TRACKING TRUMP 2.0**

There were no new broad-based regulatory policy announcements from the White House. Also, there were no new Congressional Review Act (CRA) developments.

The AAF [CRA tracker](#) provides a full survey of activity under the law thus far in 2025. As of today, members of the 119th Congress have introduced CRA resolutions of disapproval addressing 68 rulemakings across the Biden and Trump Administrations that collectively involve \$138 billion in compliance costs. Of these, 16 have been passed into law, repealing a series of Biden Administration rules that had a combined \$3 billion in associated compliance costs - roughly 2 percent of that potential \$138 billion total. While the main window of CRA action has largely passed, there are still outstanding resolutions that could move legislatively. AAF will continue to monitor and update such developments as appropriate.

## **TOTAL BURDENS**

Since January 1, the federal government has published \$700 billion in total regulatory net cost savings (with \$74.1 billion in cost savings from finalized rules) and 65 million hours of net annual paperwork cuts (with 48.1 million hours coming from final rules).



**[1] LEGISLATION TO END THE SHUTDOWN BEGAN TO MOVE THROUGH THE SENATE LATE SUNDAY EVENING. FINAL PASSAGE IS BOTH UNCERTAIN AND WILL TAKE SOME TIME. FURTHERMORE, ONE CAN EXPECT FEDERAL REGISTER ACTIVITY TO REMAIN IRREGULAR FOR A FEW DAYS FOLLOWING ANY RESTORATION OF GOVERNMENT FUNDING.**