



AMERICAN
IMMIGRATION
LAWYERS
ASSOCIATION

November 11, 2021

Loren K. Miller
Director, Nebraska Service Center
U.S. Citizenship and Immigration Services
850 'S' Street
Lincoln, NE 68508

Laura B. Zuchowski
Director, Vermont Service Center
U.S. Citizenship and Immigration Services
38 River Road
Essex Junction, VT 05479

Re: Request for Resumption of Humanitarian Unit Stakeholder Engagement

Dear Directors Miller and Zuchowski:

On behalf of the American Immigration Lawyers Association (“AILA”) and the undersigned organizations, we write to request that the Nebraska and Vermont Service Centers (together, the “Service Centers”) reestablish regular stakeholder engagement sessions.

We would like to start by expressing our appreciation for this year’s stakeholder events concerning fee waivers (April 6, 2021), the bona fide determination (“BFD”) process for U visa applicants (August 18, 2021 and October 22, 2021), and Violence Against Women (“VAWA”) self-petitions (August 26, 2021). In light of the implementation of new policies impacting individuals pursuing VAWA relief, U visas, and T visas, we appreciate the Service Centers’ efforts to promote transparency by providing timely updates and information and recording concerns raised by practitioners.

To that end, we respectfully request the resumption of on-the-record meetings between the Service Centers’ humanitarian units, AILA, and the undersigned organizations to engage on critical questions relating to the Service Centers’ adjudication of VAWA, U visa, and T visa benefits, as well as new policies impacting those forms of relief. Not only would the resumption of regular liaison meetings promote continued transparency, but it would also serve to increase efficiency by addressing best practices and agency preferences that could be expediently communicated to practitioners, including more than 15,000 AILA members.

Among the meeting topics we consider most pressing are:

- the Service Centers’ denial of fee waiver requests filed by VAWA self-petitioners and beneficiaries and U and T visa applicants and holders;

- the challenges that arise when practitioners attempt to communicate with the Service Centers concerning VAWA self-petitions, U and T visa applications, and battered spouse waivers, including through dedicated email addresses;
- the Service Centers' regular rejection of BFD-based employment authorization applications based on applicants' failure to pay or seek a waiver of filing fees when no such fees are due;
- the inadequacy of 180-day work authorization auto-extensions in light of the Service Centers' current processing times of VAWA self-petitions and VAWA-, U-, and T-based adjustment of status applications; and
- the Service Centers' issuance of RFEs that do not reflect correct legal standards and impose unnecessary hardships on vulnerable populations.

We look forward to your response and to coordinating a mutually convenient time. To arrange a date and time, or if you have any questions, please contact Sharvari Dalal-Dheini, AILA's Director of Government Relations, by telephone at (202) 507-7621 or by email at SDalal-Dheini@aila.org.

Thank you for your time and consideration.

Sincerely,

Sharvari Dalal-Dheini
 Director of Government Relations
 American Immigration Lawyers Association

Kyle Dandeleit
 Chair, VAWA, U & T National Committee
 American Immigration Lawyers Association

cc: Tracy Renaud, Acting Deputy Director, U.S. Citizenship and Immigration Services
 Cara M. Selby, Acting Associate Director, External Affairs Directorate
 Carlos Muñoz-Acevedo, Chief, Public Engagement
 Michael Valverde, Associate Director, Field Operations Directorate
 Connie Nolan, Acting Associate Director, Service Center Operations Directorate
 Phyllis Coven, Ombudsman, Office of the Citizenship and Immigration Services
 Ombudsman
 Nathan Stiefel, Deputy Ombudsman, Office of the Citizenship and Immigration Services
 Ombudsman
 Elissa McGovern, Chief of Policy Office of the Citizenship and Immigration Services
 Ombudsman

Organizational Sign-Ons

ASISTA

Association of Pro Bono Counsel

Ayuda

Coalition to Abolish Slavery & Trafficking

Freedom Network USA

Her Justice

Immigrant and Refugee Services, Catholic Charities Community Services, New York

Immigrant ARC

Immigrant Center for Women and Children

Immigrant Defenders Law Center

Immigrant Legal Resource Center

Immigration Institute of the Bay Area

Kids in Need of Defense

Life Span Center for Legal Services & Advocacy

Los Angeles Center for Law and Justice

National Immigrant Justice Center

Safe Horizon

Sanctuary for Families

Tahirih Justice Center

The Advocates for Human Rights

The Legal Aid Society

Urban Justice Center Domestic Violence Project

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