

# Adjudicator's Field Manual

NOTE: The [USCIS Policy Manual](#) is our centralized online repository for immigration policies. We are working quickly to update and move material from the Adjudicator's Field Manual to the Policy Manual. Please check that resource, along with our [Policy Memoranda](#) page, to verify information you find in the Adjudicator's Field Manual. If you have questions or concerns about any discrepancies among these resources, please contact [PolicyFeedback@uscis.dhs.gov](mailto:PolicyFeedback@uscis.dhs.gov).

## Chapter 12 Attorneys and Other Representatives.

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## 12.1 Representation before USCIS (Revised 5/23/2012; PM-602-0055.1, AD11-42)

### (a) General

An applicant or petitioner may be represented in matters filed with USCIS<sup>1</sup>. Whenever an examination is provided for under the regulations, the person involved has the right to be represented by an attorney or representative before USCIS<sup>2</sup>.

Title 8 CFR 292.1 lists the categories of individuals who may represent a “person entitled to representation” before DHS, “subject to the limitations in 8 CFR 103.2(a)(3).” An applicant or petitioner may be represented by an attorney in the United States, an attorney outside the United States (in matters occurring outside the geographical confines of the United States), or an accredited representative of a recognized organization<sup>3</sup>. Only these categories of representatives may file a notice of appearance on Form G-28 or G-28I in an application or petition proceeding before USCIS.

Law students and law graduates may engage in practice<sup>4</sup> and preparation<sup>5</sup> under the requirements described in the regulations<sup>6</sup> but may not be the official representative of record on Form G-28. USCIS provides notices in writing to the supervising attorney or accredited representative identified as the representative on the Form G-28. Law students and law graduates may attach a statement with the information required in 8 CFR 292.1(a)(2) to the Form G-28 filed by their supervising attorney or accredited representative, or in person at a USCIS office. A law student or law graduate who has filed the required statement in a case may communicate with USCIS in writing. Substantive filings require the signature of the supervising attorney or accredited representative. See section 12.1(e) for additional information.

Reputable individuals and accredited officials may assist a person entitled to representation before USCIS. Unless otherwise licensed to do so, reputable individuals may not engage in the practice of law, but may apply to appear in-person before a DHS official at an interview or other meeting or appointment at a USCIS office. These individuals may not file a Form G-28. They must provide a written declaration to the USCIS official before whom they seek to appear, and may participate in the interview process only if that official permits their appearance. The original of this written declaration is to be maintained by the USCIS official in charge of the office in which the request was made, with a copy filed in the record of proceeding. An accredited official of the government to which an applicant or petitioner owes allegiance may appear at an interview solely in his or her official capacity and only with the applicant’s or petitioner’s consent<sup>7</sup>. See section 12.1(f) for additional information.

USCIS does not provide notices in writing to reputable individuals or accredited officials<sup>8</sup>.

### (b) Attorneys in the United States

An “**attorney**” is any person who is eligible to practice law in and is a member in good standing of the bar of the highest court of any State, possession, territory, or Commonwealth of the United States, or of the District of Columbia, and is not under any order suspending, enjoining, restraining, disbaring, or otherwise restricting him or her in the practice of law.<sup>9</sup>

- An attorney need not be admitted to practice in the state in which his or her office is located or where the applicant or petitioner resides, and may have an office outside the United States, as long as he or she is an attorney as defined in the regulations.
- USCIS employees must routinely consult the DHS Disciplinary Counsel website for information on how to verify the eligibility of an attorney.
- An attorney must submit an “Notice of Entry of Appearance as Attorney or Accredited Representative” (Form G-28) in each case in which he or she seeks to appear. The form must be

properly completed and signed by the petitioner or applicant in order for the appearance to be recognized by USCIS.<sup>10</sup>

(c) Attorneys outside the United States

An “**attorney outside the United States**” is an attorney (other than one who fulfills the requirements of an “attorney” in the United States) “who is licensed to practice law and is in good standing in a court of general jurisdiction of the country in which he or she resides and who is engaged in such practice.”<sup>11</sup>

- An attorney outside the United States may only represent applicants or petitioners in matters outside the geographical confines of the United States at a USCIS overseas office. He or she must receive permission to appear from the USCIS official before whom he or she wishes to appear.
- In order to establish eligibility, such an attorney must establish that he or she resides outside the United States in the country in which he or she was admitted to the practice of law, and that he or she is engaged in practice in that country.
- An attorney outside the United States must submit a "Notice of Entry of Appearance as Attorney in Matters Outside the Geographical Confines of the United States" (Form G-28I) in each case in which he or she seeks to appear.
- The form must be properly completed and signed by the petitioner or applicant for the appearance to be recognized by USCIS.<sup>12</sup>

(d) Accredited Representative

An “**accredited representative**” is a person who represents an organization that has been recognized by the Board of Immigration Appeals (BIA) and has been accredited by the BIA to represent others in immigration proceedings before the immigration courts and the BIA of the Executive Office for Immigration Review and/or DHS.<sup>13</sup>

- EOIR maintains a list of Recognized Organizations and accredited representatives who have authority to represent individuals before EOIR and/or DHS at [www.justice.gov/eoir/legalrepresentation.htm](http://www.justice.gov/eoir/legalrepresentation.htm). Accredited representatives who are listed as “partially accredited” are authorized to practice only before DHS.
- Accredited representatives must submit a “Notice of Entry of Appearance as Attorney or Accredited Representative” (Form G-28) in each case in which they seek to appear.
- The form must be properly completed and signed by the petitioner or applicant for the appearance to be recognized by USCIS.<sup>14</sup>

(e) Law Students and Law Graduates not yet admitted to the bar

Law students who are enrolled in an accredited U.S. law school and **law graduates** of an accredited U.S. law school who are not yet admitted to the bar may engage in practice<sup>15</sup> and preparation<sup>16</sup>, constituting representation<sup>17</sup> under supervision as required in 8 CFR 292.1(a)(2).

- The supervising attorney or accredited representative of a law student or law graduate must submit a “Notice of Entry of Appearance as Attorney or Accredited Representative” (Form G-28) in application and petition proceedings before USCIS
- A **law student** enrolled in an accredited U.S. law school must file a statement that he or she is participating under the direct supervision of a faculty member, licensed attorney, or accredited representative, in a legal aid program or clinic conducted by a law school or non-profit

organization and is appearing without direct or indirect remuneration from the individual he or she represents.<sup>18</sup>

- A **law school graduate** of an accredited U.S. law school who is not yet admitted to the bar must file a statement that he or she is appearing under the supervision of an attorney or accredited representative, and is appearing without direct or indirect remuneration from the applicant or petitioner.<sup>19</sup>
- The statement from the law student or law graduate may be attached to the Form G-28 filed by the supervising attorney or accredited representative, or submitted in person at a USCIS office. (See Sample Statement in Appendix 12-1.)
- Law students and law graduates must seek permission from the DHS official before whom they seek to appear with an applicant or petitioner in person at a USCIS office<sup>20</sup>. If the DHS official does not permit a law student or law graduate to appear, the reason for this decision shall be provided to the law student or law graduate in writing.
- The USCIS officer may require that the supervising faculty member, attorney, or accredited representative appear with the law student or law graduate<sup>21</sup>. Law students and law graduates who are accompanied by the supervising attorney or accredited representative shall be permitted to appear at the interview or other examination.
- If the USCIS officer observes an action by a law student or law graduate that provides good cause for the officer to believe that the representation by the law student or law graduate will impair the efficient conduct of the proceeding, the USCIS officer may alert a USCIS supervisor who may contact the supervising faculty member, attorney, or accredited representative if they are not present.
- All notices and communication to the applicant/petitioner's representative in such cases should be addressed to the supervising attorney or accredited representative listed on the Form G-28 (not the law student or law graduate). Law students and law graduates who have submitted a statement with the information required in 8 CFR 292.1(a)(2) may communicate in writing with USCIS with regard to procedural issues, such as rescheduling of interviews or biometrics appointments. Substantive filings, such as the filing of briefs or submission of evidence, require the signature of the supervising attorney or accredited representative.

#### (f) Reputable Individuals

A **reputable individual** is an individual of good moral character who appears on an individual case basis at the request of the person entitled to representation. The reputable individual must have a pre-existing relationship with the applicant or petitioner (e.g., relative, neighbor, clergyman, business associate or personal friend), and must not receive payment directly or indirectly for his or her representation<sup>22</sup>. A USCIS official may waive the requirement that a pre-existing relationship exist between the applicant or petitioner and the representative in cases where adequate representation would not otherwise be available.<sup>23</sup>

- The reputable individual must submit a declaration that states that he or she is appearing without direct or indirect remuneration. (See Sample Declaration in Appendix 12-1.)
- The reputable individual must receive permission from the DHS official before whom he or she wishes to appear. In order to determine whether or not to grant the request of a person seeking to appear as a reputable individual, the DHS official should review the declaration presented and ask the individual questions regarding his or her eligibility and record this information in the record of

proceedings. Permission will not be granted to any individual who regularly engages in immigration and naturalization practice or preparation or holds himself or herself out to the public as qualified to do so.<sup>24</sup>

- USCIS does not accept Forms G-28 filed by reputable individuals, as they are not included in the limited category of representatives in 8 CFR 103.2(a)(3).<sup>25</sup>
- The reputable individual who is granted permission to appear with an applicant or petitioner may appear only in-person in that case.
- UUSCIS does not send notices or other written communications to reputable individuals.<sup>26</sup>

(g) Accredited Officials

An **accredited official** of the alien's home government (e.g., a consular officer) may represent an alien if the official is in the United States and appears solely in his official capacity and with the applicant's or petitioner's consent.<sup>27</sup>

- In exercising discretion to allow an accredited official to appear before DHS, DHS officials should ensure that the individual does not regularly engage in immigration practice or preparation or hold himself out to the public as qualified to do so. To properly document this exercise of discretion, DHS officials should request such individuals submit a written statement in support of their appearance, addressing the relevant factors. (See Sample Statement in Appendix 12-1.)
- USCIS does not send notices or other written communications to accredited officials.<sup>28</sup>

**NOTES**

<sup>1</sup>8 CFR 103.2(a)(3) (2011)

<sup>2</sup>8 CFR 292.5(b) (2011). Refugee applicants do not have the right to representation, as such applicants are deemed to be applicants for admission. Consistent with the longstanding position of the former Immigration and Naturalization Service and USCIS, refugee applicants do not have the right to representation during an interview regarding a request for classification as a refugee, unless the applicant is the focus of a criminal investigation and has been taken into custody as outlined in 8 CFR 292.5(b). Accordingly, this guidance does not apply to the Refugee Affairs Division or the Asylum Division of the Refugee, Asylum, and International Operations Directorate, which are governed by other established procedures, guidance, and lesson plans. This guidance does not apply to site visits conducted by the Fraud Detection and National Security Directorate, which are governed by other established procedures, guidance, and lesson plans.

<sup>3</sup>8 CFR 103.2(a)(3) (2011)

<sup>4</sup> 8 CFR 1.2

<sup>5</sup> 8 CFR 1.2

<sup>6</sup>8 CFR 292.1(a)(2) (2011)

<sup>7</sup>8 CFR 292.1(a)(5) (2011)

<sup>8</sup> Id.

<sup>9</sup>8 CFR 1.2 (2011)

<sup>10</sup>8 CFR 292.4(a) (2011); Instructions for Form G-28 (Rev. 04/22/09)N

<sup>118</sup> CFR 292.1(a)(6) (2011)

<sup>128</sup> CFR 292.4(a) (2011); Instructions for Form G-28I (04/22/09)

<sup>138</sup> CFR 292.1(a)(4) & 8 CFR 292.2

<sup>148</sup> CFR 292.4(a) (2011); Instructions for Form G-28 (Rev. 04/22/09)N

<sup>158</sup> CFR 1.2 (2011)

<sup>168</sup> CFR 1.2 (2011)

<sup>178</sup> CFR 1.2 (2011)

<sup>188</sup> CFR 292.1(a)(2) (2011)

<sup>198</sup> CFR 292.1(a)(2) (2011)

<sup>208</sup> CFR 292.1(a)(2)(iv) (2011)

<sup>218</sup> CFR 292.1(a)(2) (2011)

<sup>228</sup> CFR 292.1(a)(3) (2011)

<sup>238</sup> CFR 292.1(a)(3)(iii) (2011)

<sup>248</sup> CFR 292.1(a)(3)(iv) (2011)

<sup>258</sup> CFR 103.2(a)(3); 292.1(a); 292.4(a) (2011); Instructions for Form G-28 (Rev. 04/22/09)N

<sup>268</sup> CFR 103.2(a)(3) and 292.5(a) (2011)

<sup>278</sup> CFR 292.1(a)(5) (2011)

## 12.2 Appearances before USCIS

### (a) Filing a Notice of Entry of Appearance as Attorney or Accredited Representative

Attorneys, attorneys outside the United States, and accredited representatives must establish their eligibility to appear on the form designated by DHS in each case.<sup>1</sup>

- Attorneys and accredited representatives must submit a Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative.
- Attorneys outside the United States must submit a Form G-28I, Notice of Entry of Appearance as Attorney in Matters Outside the Geographical Confines of the United States.
- The Form G-28 and Form G-28I must be properly completed and signed by the applicant or petitioner in order for the appearance to be recognized by USCIS. Once the Form G-28 or Form G-28I is accepted, the appearance will be properly recognized until the conclusion of the matter for which it was entered.
- When filing an appeal with the Administrative Appeals Office on Form I-290B, the attorney or accredited representative must file a new Form G-28.
- Other representatives (law students, law graduates, reputable individuals and accredited officials) may not submit Form G-28 or Form G-28I.
- See section 12.1(e) for additional information on law students and law graduates.

USCIS officers may verify an attorney's or accredited representative's eligibility and require further proof of authority to act in a representative capacity. Officers should seek more information at the DHS Disciplinary Counsel website and at [www.justice.gov/eoir/legalrepresentation.htm](http://www.justice.gov/eoir/legalrepresentation.htm). Officers should also reference the list of disciplined practitioners at <http://www.justice.gov/eoir/discipline.htm>, which includes attorneys and accredited representatives who are currently disbarred or suspended from practice before DHS and EOIR. USCIS officers should be aware of individuals who have falsely claimed to be attorneys or accredited representatives when they are not and individuals who have been the subject of federal, state, or local court action to stop their unauthorized practice of law or theft of fees for legal services they may not lawfully provide. USCIS officers should not communicate with these individuals, even if they submit a "Notice of Entry of Appearance as Attorney or Representative" (Form G-28) in a case.

### (b) Substitution or Withdrawal of Representation.

It is not uncommon for applicants or petitioners to wish to change representatives or elect to forgo representation during the course of a proceeding. Notification to USCIS of the substitution or withdrawal of a representative may occur in a written notice of withdrawal by the representative of record or upon the filing of a properly completed G-28 or G-28I by the new representative<sup>2</sup>. Written notifications are to be filed in the record of proceedings. An applicant or petitioner may elect to proceed without his or her representative, but must submit a written statement to the USCIS official that he or she has voluntarily chosen to proceed without representation.

## NOTES

<sup>1</sup> 8 CFR 292.4(a) (2011)

<sup>2</sup> 8 CFR 292.4 (2011)



**12.3 Proper Service of Documents & Notices, has been superseded by USCIS Policy Manual, Volume 11: Travel and Identity Documents as of January 16, 2019.**

## 12.4 Interviews

When an examination is to be conducted in immigration proceedings, the person involved has the right to be represented, at no expense to the government, by an attorney or representative, as defined in 8 CFR 292.1(a). The role of the representative at an interview is to ensure that the rights of the individuals he or she represents are protected.

When conducting an interview of a petitioner and beneficiary simultaneously, attorneys or other representatives of both the petitioner and beneficiary will be permitted to appear.<sup>1</sup> In visa petition proceedings, representatives who have obtained the consent of the petitioner should be recognized in interviews with the petitioner. Representatives who have obtained the consent of the beneficiary should be recognized in interviews with the beneficiary. An attorney or representative may not respond to questions the USCIS officer directs to the applicant, petitioner, or witness, except to ask the USCIS officer to clarify the question asked. An attorney or representative may ask the applicant or petitioner additional questions at the conclusion of the interview by the officer.

An attorney or other representative of an applicant or petitioner may not simultaneously serve as his or her client's interpreter during an interview<sup>2</sup>. If, after being so advised, the attorney or other representative continues to interpret for the applicant or petitioner or otherwise disrupts the interview, USCIS may terminate the interview and advise the parties that the interview cannot be completed under these circumstances and that USCIS will proceed to make a decision based on the record of proceedings.<sup>3</sup>

See Chapter 15 for additional guidance on Interview Techniques.

### NOTES

<sup>1</sup> 8 CFR 103.2(a)(3) (2011)

<sup>2</sup> Exceptions may be made if the interests of the Government will not be prejudiced.

<sup>3</sup> This language does not apply to examinations governed by 8 CFR 312.4.

## **12.5 Rules of Professional Conduct for Practitioners**

DHS has rules of professional conduct for practitioners who practice before the Department's immigration agencies<sup>1</sup>. Under the rules, practitioners (attorneys, accredited representatives and other categories of representatives permitted to appear by DHS) are subject to discipline for criminal, unethical, or unprofessional conduct. Complaints of professional misconduct by practitioners should be reported to the DHS Disciplinary Counsel. USCIS officers should visit the Disciplinary Counsel website for more information on professional conduct, reporting misconduct, and how to verify the eligibility of an attorney or accredited representative. Attorneys and other representatives have a duty to represent their clients zealously. They must, however, do so within the bounds of the law and in accordance with the Rules of Professional Conduct for Practitioners.

Officers should not engage in personal conversations or arguments with attorneys or other representatives during the course of an interview. If a discussion becomes disruptive, abusive, or otherwise interferes with the orderly process of the interview, the officer should seek assistance from a supervisor. The attorney or representative may object to the appropriateness of a line of questioning and, as a last resort, may request supervisory review without terminating the interview. Where necessary, disagreements between USCIS officers and attorneys or other representatives regarding the appropriate role of the attorney or other representative in USCIS interviews, should be elevated to the Field Office Director. USCIS employees may not file complaints directly to state bar disciplinary authorities. Complaints of unethical and unprofessional conduct by attorneys or other representatives should be reported to DHS Disciplinary Counsel through appropriate supervisory channels.

### **NOTES**

<sup>1</sup> 8 CFR 292.3 (2011)

## **12.6 Role of USCIS District Directors in the Board of Immigration Appeals Recognition and Accreditation Process. [Added June 7, 2011; PM-602-0039, AD11-34]**

### **(a) Establishing a Recognition and Accreditation Point-of-Contact (POC) or Team.**

(1) Identify a single recognition and accreditation POC or designate several operational staff members in each district office to be part of a recognition and accreditation team to handle these requests.

(2) Each district office should identify a recognition and accreditation POC or team comprised of several operational staff members from its operational staff (e.g., Field Office Director, Community Relations Officer, Fraud Detection and National Security (FDNS) Officer, officer from the Office of Security and Integrity (OSI)) who is most appropriate for that particular office. The recognition and accreditation POC or team should be familiar with the community-based organizations in the district and have worked with local BIA recognized organizations.

**Note:** To the extent possible, a recognition and accreditation team should include a Community Relations Officer and an FDNS officer.

### **(b) Ensuring Timely Receipt of Requests for USCIS Recommendation.**

(1) Notify field offices that all such requests should be forwarded to the district office.

(2) Expedite mailroom processing to ensure that the recognition and accreditation POC or team receives all Forms EOIR-31 and applications for accreditation of representative(s) well before the response period expires, thirty days after USCIS receives each Form EOIR-31.

(3) Date stamp all Forms EOIR-31 and applications for accreditation of representative(s) on the date they arrive at the district office to ensure that the recognition and accreditation POC or team knows when the 30-day period will expire.

### **(c) Reviewing Requests for USCIS Recommendation.**

(1) Upon receiving a request, if it is unlikely the office will be able to respond within 30 days, the recognition and accreditation POC or team should immediately request an appropriate extension through the BIA Recognition and Accreditation Coordinator so that the BIA is aware that a response from USCIS will be forthcoming. One to two weeks after a request for an extension is submitted, the POC or a team member should contact the BIA Recognition and Accreditation Coordinator to determine whether he or she granted the extension. The program coordinator's telephone number is (703) 305-9029.

(2) The recognition and accreditation POC or team should review the organization or individual's qualifications to provide immigration services.

**Note:** The USCIS Checklist: Request for BIA Recognition and Accreditation (see **Appendix 12-1**) and the USCIS Worksheet: Requests for Recognition and Accreditation Processing and Procedures (see **Appendix 12-2**) may be used as a resource to help organize requests for recognition and accreditation, but use of the checklist and worksheet is not required.

In evaluating the qualifications of an organization, the team should review relevant information, which may include:

- Form **EOIR-31**;
- Evidence of non-profit status;

- Evidence of what type of services the organization intends to provide;
- Source of the organization's funding;
- Evidence of knowledge, information, and experience in immigration law and procedure;
- Proposed fee structure for services;
- Any additional information, including IBIS checks, review of agency databases including SCCLAIMS, site visits, personal interviews of organization officials, and references; and
- Evidence that the organization or individual is being investigated or prosecuted in a civil or criminal matter for violations relevant to the EOIR-31 (e.g., consumer fraud, unauthorized practice of law, etc.).

In evaluating the qualifications of an individual for whom a recognized organization has filed a request to be accredited as a representative, the recognition and accreditation POC or team should review relevant information, which may include:

- Request for accreditation of representative submitted by recognized organization;
- Letters of recommendation, awards, training certificates, etc;
- Evidence of experience and knowledge of immigration and naturalization law and procedure;
- Evidence of compensation agreement with the recognized organization;
- Evidence of plan for supervision of accredited representative by recognized organization;
- Any additional information regarding the individual's relationship with the recognized organization, qualifications, and good moral character, including: site visits, personal interviews of organization officials, and references; and
- Evidence that the organization or individual is being investigated or prosecuted in a civil or criminal matter for violations relevant to the request (e.g., consumer fraud, unauthorized practice of law, etc.).

(3) The recognition and accreditation POC or team should seek input from the local ICE office, district Community Relations Officer and the Field Office Director, FDNS officers, supervisory and senior immigration services officers, and USCIS counsel in the jurisdiction where the organization is located.

(4) If the recognition and accreditation POC or team and other USCIS staff are not familiar with the organization or individual, the District or Field Office Director should contact the organization or individual practitioner to assess the strength of the application.

(5) The recognition and accreditation POC or team should conduct checks of media reports, public databases, and other sources to obtain additional information about the organization and individuals seeking accredited representative status.

(6) The recognition and accreditation POC or team should ask FDNS to vet individuals seeking accreditation and any organizations seeking recognition that have not previously been fully vetted through USCIS fraud databases, such as the FDNS data system. If necessary, the POC or team should ask ICE to conduct further background checks.

(7) The recognition and accreditation POC or team should check with the state bar (with the assistance of local USCIS counsel where possible) and other appropriate state agencies, the local FDNS unit, EOIR Disciplinary Counsel (full accreditation requests only), and USCIS Disciplinary Counsel to determine whether there have been any complaints about the organization or individual(s) applying for recognition or accreditation status. The EOIR Office of General Counsel can be contacted at (703) 305-0470.

**(d) Responding to Requests for USCIS Recommendation.**

(1) If the district office recommends approval, the District Director should submit a letter to the BIA with supporting evidence, if available (see **Appendix 12-3**). A copy of all documents filed with the BIA must be served on the organization. Personally identifiable information should be redacted as required by the Privacy Act and DHS policy.

(2) If the district office recommends against approval, a letter should be submitted to the BIA with supporting evidence, if available (see **Appendix 12-4**). Supporting evidence is not required, but may include affidavits or sworn statements by adjudicators, investigators, clients of the applicant representative; criminal history reports; G-28s; investigation results, etc. Note: USCIS may not base a negative recommendation on information that it is unwilling or unable to release to the BIA. A copy of all documents filed with the BIA must be served on the organization. Personally identifiable information should be redacted as required by the Privacy Act and DHS policy.

(3) The recognition and accreditation POC or team should track all requests for recognition, including the date the Form EOIR-31 is received, due dates for response, date on which a request for additional time in which to submit the recommendation is filed with the BIA, the due date after an extension is granted by the BIA, the date that the recommendation is submitted to the BIA by USCIS or ICE, and the date and disposition by the BIA.

(4) The recognition and accreditation POC or team should retain copies of the all documentation related to the Form EOIR-31 and application(s) for accreditation of representatives.

**(e) After Submitting Recommendation to BIA.**

The recognition and accreditation POC or team should retain all responses from the BIA, and inform the local USCIS counsel, Field Office Director, and District Director of the BIA decision on all EOIR-31 forms and application(s) for accreditation of representative(s).

**(f) Withdrawal of BIA Recognition or Accreditation.**

If a USCIS officer believes that an organization's recognition should be revoked, he or she should report the concerns through the supervisory chain of command to the District Director. The District Director has authority to conduct an investigation and, if warranted, may submit a written request to the BIA requesting that the organization's recognition be withdrawn. The filing must include the results of the investigation of the recognized organization. The request must be filed with the BIA recognition and accreditation coordinator and a copy must be served on the organization. An immigration judge will hold a hearing and forward all evidence, along with his or her recommendation, to the BIA. USCIS, ICE, and the organization will have the opportunity to engage in an oral argument before the BIA, after which the BIA will render a decision.

**(g) Summaries of BIA Decisions Relating to the Recognition and Accreditation Process.**

*Matter of Elly Velez Pamatong* (Interim Decision #2743 - November 1979)

- **Summary:** A graduate of the University of Philippines Law Program, who was considered a refugee by the U.N. High Commissioner for Refugees, applied for permission to represent individuals

before the Board of Immigration Appeals and the Immigration and Naturalization Service. Notwithstanding the provisions of Article 19 of the Convention and Protocol Relating to the Status of Refugees, his application was denied because he was not an attorney within the meaning of 8 CFR 292.1, or fit under the categories listed in that provision.

- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol17/2743.pdf>

*Matter of American Paralegal Academy, Inc.* (Interim Decision # 3012 - April 1986)

- **Summary:** Nominal charges are not defined in terms of specific dollar amounts, but have been interpreted to mean a very small quantity or something existing in name only as distinguished from something real or actual. An applicant for BIA recognition, whose charges for services exceed amounts which can be construed as nominal may not rely upon the notion that its fees are substantially less than those charged by law firms, or that its fees are one of the means by which it is able to fund itself.
- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol19/3012.pdf>

*Matter of Lutheran Ministries of Florida* (Interim Decision #3132 - February 1990)

- **Summary:** An application for BIA recognition should include detailed information as to how the organization will operate and by whom it will be staffed, as well as other evidence regarding the organization's qualifications, such as resumes for the staff members and information as to the availability of legal resource materials, training programs in immigration law and procedure, and supervised employment for the staff.
- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol20/3132.pdf>

*Matter of Florida Rural Legal Services Inc.* (Interim Decision #3196 - February 1993)

- **Summary:** An organization requesting recognition or accreditation of its representatives, which has physically separate offices, must demonstrate by individual application that each office independently has at its disposal adequate knowledge, information, and experience in immigration law and procedure, and that it makes only nominal charges and assesses no excessive membership dues for persons given assistance.
- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol20/3196.pdf>

*Matter of Baptist Educational Center* (Interim Decision #3210 - September 1993)

- **Summary:** During proceedings to withdraw an organization's recognized status, if an organization wishes to retain its recognized status, it must demonstrate by clear, unequivocal, and convincing evidence that it continues to satisfy the requirements for recognition.
- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol20/3210.pdf>

*In re Chaplain Services, Inc.* (Interim Decision #3292 - July 1996)

- **Summary:** In an application for recognition, an applicant must respond to and successfully rebut an adverse recommendation made by the district director, even when such recommendation has been made in a prior recognition proceeding involving the applicant. In this case, the applicant's request for recognition was denied because, among others, applicant failed to rebut allegations made by the district director in prior recognition proceedings that the applicant's organization provided clients with misinformation; that the applicant improperly submitted Notices of Entry of

Appearance as Attorney or Representative (Forms G-28) on behalf of a purportedly associated attorney who never performed services; that the applicant's clients had been charged excessive amounts for services in spite of the applicant's fee list which reflects nominal charges; and that the member of the applicant's staff upon whose expertise the applicant relies has been the subject of complaints for the unauthorized practice of law.

- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol21/3292.pdf>

*Matter of EAC Inc., Request for Recognition* (Interim Decision #3614 - July 2008)

- **Summary:** The process of recognition is designed to evaluate the qualifications of only those nonprofit organizations that provide knowledgeable legal assistance to low-income aliens in matters involving immigration law and procedure. In order to establish that it has adequate knowledge of immigration law and procedure, an organization seeking recognition must have sufficient access to legal resources, which may include electronic or internet access, as well as resources provided by a law library. An organization seeking recognition must show that it has either a local attorney who is on the staff, offering pro bono services, or providing consultation under a formal arrangement; a fully accredited representative; or a partially accredited representative with access to additional expertise. A recognized organization that does not offer a full range of immigration legal services or whose staff is not sufficiently experienced to handle more complex immigration issues must have the ability to discern when it should direct aliens to seek other legal assistance.

- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol24/3614%28recog%29.pdf>

*Matter of EAC Inc., Request for Accreditation* (Interim Decision #3615 - July 2008)

- **Summary:** All accredited representatives on the staff of a recognized organization must have a broad knowledge of immigration law and procedure, even if the organization only intends to provide limited services through one or more partially accredited representatives. In order to show that a proposed accredited representative has the broad knowledge and experience in immigration law and procedure required by 8 CFR § 1292.2(d) (2008), a recognized organization should submit the individual's resume, letters of recommendation, and evidence of immigration training completed, including detailed descriptions of the topics addressed.
- **Full Text of Decision:** <http://www.justice.gov/eoir/vll/intdec/vol24/2615%28accred%29.pdf>



## Appendix 12-1 Sample Statements and Declarations

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Sample Statements of Individuals Requesting Permission to Appear Before a USCIS Official:

- [Law Student](#)
- [Law Graduate](#)
- [Reputable Individual](#)
- [Accredited Official](#)

### SAMPLE STATEMENT OF LAW STUDENT REQUESTING PERMISSION TO APPEAR BEFORE A USCIS OFFICIAL

I, John Smith, seek permission to appear before Mary Jones, a USCIS official, on behalf of Jane Doe, a person entitled to representation, as a law student enrolled in Anystate Law School, an accredited U.S. law school.

I am appearing at the request of Jane Doe, a person entitled to representation.

I am participating under the direct supervision of Sam Samuels, a faculty member, Susan Williams, a licensed attorney, or Joe Johnson, a BIA accredited representative in a legal aid program or clinic conducted by a law school or non-profit organization.

I am appearing without direct or indirect remuneration from the individual I seek to represent.

**John Smith**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

I, Mary Jones, the USCIS official before whom John Smith seeks to appear as a representative, in the exercise of discretion GRANT the request.

**Mary Jones**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

The original of this document is to be maintained by the USCIS official in charge of the office in which the request was made, with a copy filed in the record of proceeding.

SAMPLE STATEMENT OF A LAW GRADUATE REQUESTING  
PERMISSION TO APPEAR BEFORE A USCIS OFFICIAL

I, John Smith, seek permission to appear before Mary Jones, a USCIS official, on behalf of Jane Doe, a person entitled to representation, as a graduate of Anystate Law School, an accredited U.S. law school, who is not yet admitted to the bar.

I received my law degree on June 1, 2011 and will take the bar examination on February 21, 2012; or, sat for the bar examination on July 24, 2011 and have not yet received my results.

I am appearing at the request of Jane Doe, a person entitled to representation.

I am appearing under the supervision of Susan Williams, a licensed attorney, or Joe Johnson, an accredited representative. I am appearing without direct or indirect remuneration from the individual I seek to represent.

**John Smith**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

I, Mary Jones, the USCIS official before whom John Smith seeks to appear as a representative, in the exercise of discretion GRANT the request.

**Mary Jones**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

The original of this document is to be maintained by the USCIS official in charge of the office in which the request was made, with a copy filed in the record of proceeding.

SAMPLE DECLARATION OF A REPUTABLE INDIVIDUAL REQUESTING  
PERMISSION TO APPEAR BEFORE A USCIS OFFICIAL

I, John Smith, seek permission to appear before Mary Jones, a USCIS official, on behalf of Jane Doe, a person entitled to representation, as a reputable individual of good moral character, as defined in 8 CFR 292.1(3).

I am appearing on an individual case basis at the request of Jane Doe, a person entitled to representation. I am appearing without direct or indirect remuneration. I have a pre-existing relationship with Jane Doe as a relative, neighbor, clergyman, business associate, and/or personal friend.

I am not regularly engaged in immigration and naturalization practice or preparation, nor do I hold myself out to the public as qualified to do so.

I declare, under penalty of perjury under the laws of the United States of America, that this statement is all true and correct.

**John Smith**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

I, Mary Jones, the USCIS official before whom John Smith seeks to appear as a representative, in the exercise of discretion GRANT the request

**Mary Jones**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

The original of this document is to be maintained by the USCIS official in charge of the office in which the request was made, with a copy filed in the record of proceeding.

SAMPLE STATEMENT OF AN ACCREDITED OFFICIAL REQUESTING  
PERMISSION TO APPEAR BEFORE A USCIS OFFICIAL

I, John Smith, seek permission to appear before Mary Jones, a USCIS official, on behalf of Jane Doe, a person entitled to representation, as an accredited official of the Nowhereland government to which Jane Doe owes allegiance.

I am not regularly engaged in immigration and naturalization practice or preparation, nor do I hold myself out to the public as qualified to do so.

I am appearing with the consent of Jane Doe, a person entitled to representation.

**John Smith**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

I, Mary Jones, the USCIS official before whom John Smith seeks to appear as a representative, in the exercise of discretion GRANT the request.

**Mary Jones**

January 1, 2012

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

The original of this document is to be maintained by the USCIS official in charge of the office in which the request was made, with a copy filed in the record of proceeding.

## **APPENDIX 12-2: WORKSHEET FOR REQUESTS FOR RECOGNITION AND ACCREDITATION PROCESSING AND PROCEDURES**

### I. Recognition Process:

- A. Is the Organization a non-profit religious, charitable, social service, or similar organization?

Examples of supporting documentation include:

- Articles of Incorporation, Charter, Constitution and by-laws, which may indicate the purpose of the organization or under what authority it is being incorporated;
- Evidence of tax-exempt status such as letters or statements from the IRS, tax returns, etc.;
- Balance sheets and/or financial statements showing source(s) of funding and income;
- Newspaper articles or other information showing the organization's community activities.

Notes:

- If the information shows that the majority of the organization's operating expenses are borne by the fees charged to the organization's clients for services rendered, it is less likely that it is a non-profit organization;
- Consider the services to be rendered by the organization. For example, if an organization indicates that it will engage in completing employment based petitions, it is unlikely that the clients seeking these types of services would be low-income or indigent aliens for whom the accreditation process was designed to assist;
- If the organization is affiliated with an attorney or law firm, examine the nature of their relationship. For example, whether the attorney is an employee of the organization, whether the attorney works for the organization on a *pro bono* basis; or is the organization a means for the referral of clients to the attorney. *See, i.e., Matter of Baptist Education Center, 20 I&N 723 (BIA 1993):* the Board of Immigration Appeals terminated the organization's status as a recognized organization, finding that the organization had failed to establish by clear, unequivocal or convincing evidence that it was a non-profit organization, independent of and separate and apart from its founder and representative, who was a non-lawyer who used the organization's recognition as a means of continuing his immigration counseling practice to receive income for himself; *see also Matter of EAC, Inc., 24 I&N 556 (BIA 2008);*

- B. Does the Organization charge nominal fees?

Examples of supporting documentation include:

- List of fees;
- Balance sheets and/or financial statements showing source(s) of funding and income.

Notes:

- The Board of Immigration Appeals defines a “nominal” fee as “a very small quantity or something existing in name only, as distinguished from something real or actual. *See Matter of American Paralegal Academy*, 19 I&N Dec. 386, 387 (BIA 1986); consideration should also be given to the rates and fees charged for like services by the private sector in the district’s community or area, however, the organization may not rely upon the fact that its fees are substantially less than those charged by law firms, or that its fees are one of the means by which it is able to fund itself..
- Statements which fail to specify an amount certain to be charged for services may be too vague or indefinite to establish a “nominal fee.” For example, statements indicating that clients are not charged a fee but instead are asked to provide suggested donations may be too speculative and indefinite to establish that the fees are nominal. Likewise, statements indicating that fees can or may be waived in the exercise of discretion or that fees are “proposed” fees likewise may be too speculative and indefinite.
- If the majority of an organization’s funding comes from the fees it charges its clients, the fees the organization charges are probably not nominal.
- *See, i.e. Matter of American Paralegal Academy, Inc. supra.* In that case the applicant provided the Board with a detailed fee schedule for each of the services provided. The fee schedule included, inter alia a submission indicating that the fees charged to clients would be based on income and family size. The Board denied accreditation because, among other reasons, the organization had failed to establish that the fees charged were “nominal.” In support of this conclusion the Board noted that, “the applicant’s characterization of the amounts it requests in payment for services as ‘donations’ is not persuasive in a determination of ‘nominal charges.’”
- If a fee schedule is submitted, consider the proposed fees charged for the specific application in question. For example, if the agency is charging an unreasonable amount of money for the completion of an application for asylum or a petition for battered spouse, not only may the amount charged not be nominal, but it may also suggest that the organization is not truly a social service, religious or charitable organization. *See Section A, supra.*

C. Is the organization an affiliate, branch or satellite office of a Board recognized organization?

- If so, each physically separate office of the organization must demonstrate by individual application that each office independently has at its disposal adequate knowledge, information, and experience in immigration law and procedure and that it makes only nominal charges and assesses no excessive membership dues for persons given assistance. *See Matter of Florida Rural Legal Services, Inc.*, 20 I&N 639 (BIA 1993).

D. Does the Organization have at its disposal adequate knowledge, information and experience?

Examples of supporting documentation include:

- Resumes of the organization's staff members;
- Diagram of the Organizational structure of the organization;
- Letters of Recommendation;
- List of books and other resources regarding immigration law and procedure at the organization's disposal;
- List of classes, trainings, agendas or certificates of completion for courses taken by the staff on immigration law and procedure;
- Explanation of how the employees are supervised and by whom.

Note:

- *See Matter of Lutheran Ministries of Florida*, 20 I&N 185 (BIA 1990): An application of a nonprofit organization seeking recognition should include detailed information as to how the organization will operate and by whom it will be staffed, as well as other evidence regarding the organization's qualifications such as resumes for the staff members and information as to the availability of legal resource materials, training programs in immigration law and procedure, and supervised employment for the staff.

II. Accreditation Process:

- An organization recognized by the Board pursuant to section I, *supra*, may apply for the accreditation of one or more individuals to serve as its representative(s). *See* 8 CFR § 292.2(d) and § 1292.2(d). An individual may not apply for accreditation on his/her own behalf.
- The request for accreditation may be filed simultaneously with an EOIR-31 "Request for Recognition as a Non-Profit Religious, Charitable, Social Service, or Similar Organization" or may occur subsequent to approval of the EOIR-31 by the BIA.

A. Partial versus Full Accreditation;

Partial: allows the accredited representative to appear before DHS only;

Full: allows the representative to appear before DHS, the Board, and the immigration courts. The DD's response to a request for full accreditation should include input from ICE;

- Once approved, an individual's status as an accredited representative is valid for three years (absent withdrawal of the recognition of the organization or practitioner discipline imposed on the accredited representative by the BIA);
- Renewal of an individual's status as an accredited representative is not automatic. The recognized organization must apply for renewal of the accreditation of its

representative(s) prior to the expiration of his or her accredited status and must establish that the individual continues to fulfill the requirements of accreditation.

B. Does the individual have good moral character?

Examples of supporting documentation include:

- Resumes;
- Letters of Recommendation;
- Police clearance letters.

Notes:

- An individual who has engaged in the unauthorized practice of law or is being prosecuted by the state bar may be unable to establish good moral character.
- An individual with a criminal background may be unable to establish good moral character.
- The regulations do not define “good moral character” nor do they specify a time period during which a person must establish good moral character.

C. Does the individual have sufficient experience and knowledge of immigration and naturalization law and procedure?

Examples of supporting documentation include:

- The individual’s resume;
- List of classes, trainings agendas or certificates of completion for courses taken by the individual;
- Letters of Recommendation; and
- List of books and other resources regarding immigration law and procedure at the individual’s disposal.

Notes:

- The District may wish to consider the individual’s responsibilities on behalf of the recognized organization, the types of services to be rendered by the individual on behalf of the recognized organization, who will be supervising the individual and how, and with what frequency will they be supervised. For example, an individual who will be providing assistance in completing N-400s and N-600s but who has had no specific training in naturalization would probably have difficulty in establishing sufficient knowledge of immigration law and procedure.
- The District may wish to explore the individual’s reputation with USCIS staff, including information officers, community relations officers and adjudicators.



## **APPENDIX 12-3: SAMPLE APPROVAL LETTER TO BIA RECOGNITION & ACCREDITATION PROGRAM COORDINATOR**

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Name of Field Office  
Street Address  
City, State Zip Code



U.S. Citizenship  
and Immigration  
Services

[MONTH DAY, YEAR]

Recognition & Accreditation Program Coordinator  
Executive Office for Immigration Review  
Board of Immigration Appeals, Clerk's Office  
Post Office Box 8530  
Falls Church, VA 22041

Subject: Form EOIR-31 "Request for Recognition as a Non-Profit Religious, Charitable, Social Service, or Similar Organization" of [NAME OF ORGANIZATION]: **USCIS Recommendation for Approval**

Dear Coordinator:

On [DATE], this office received a "Request for Recognition as a Non-Profit Religious, Charitable, Social Service, or Similar Organization" (EOIR-31) filed by [NAME OF ORGANIZATION]. USCIS has reviewed the EOIR-31, conducted an inquiry, and in compliance with 8 CFR 292.2(b) submits its recommendation to the Board of Immigration Appeals (BIA).

USCIS recommends that the BIA approve the EOIR-31 filed by [NAME OF ORGANIZATION]. [NAME OF ORGANIZATION] has been active in the [CITY NAME] community for many years and has provided consistent service and sound guidance to the immigrant community. In determining whether to recommend approval of the EOIR-31 filed by [NAME OF ORGANIZATION], this office reviewed the organization's Form EOIR-31, evidence of non-profit status, the type of services that will be provided, and evidence that the organization possesses sufficient knowledge, information, and experience in immigration law to provide adequate services to USCIS applicants. This included a review of relevant training certificates, letters from attorneys or other BIA recognized organizations, and awards given to [NAME OF ORGANIZATION]. Further, this office has reviewed the organization's proposed fees and views them to be nominal as required in the regulations.

The USCIS District Office review has not identified any pending administrative, civil or criminal litigation matters relevant to the request for recognition involving [NAME OF ORGANIZATION]. [NAME OF ORGANIZATION] has provided a comprehensive and sound

plan to ensure that it has regular and ongoing access to legal supervision by an attorney who has demonstrated immigration legal expertise. In its many years operating in the community, [NAME OF ORGANIZATION] has provided reliable service and continuous support to USCIS applicants.

**If applicable:**

This office has also conducted background checks, reviewed media reports and other public sources, consulted with the state bar [OR OTHER STATE/LOCAL AUTHORITIES, IF APPLICABLE], and found no adverse information regarding [NAME OF ORGANIZATION]. In addition, District Office staff has visited the [NAME OF ORGANIZATION] offices and met with both leadership and staff members. During this meeting, [NAME OF ORGANIZATION'S] staff demonstrated a genuine and sincere interest in, and the ability to provide immigration legal services.

Representatives and employees of [NAME OF ORGANIZATION] have visited the [NAME OF DISTRICT] office frequently and provided translation and preparer assistance to applicants and petitioners before USCIS. The representatives and employees of [NAME OF ORGANIZATION] have engaged in these non-representational activities respectfully and without incident.

[NAME OF ORGANIZATION] has established that it makes only nominal charges and assesses no excessive membership dues for persons given assistance, and that it has at its disposal adequate knowledge, information and experience, as required by 8 CFR 292.2(a).

For all of the reasons described above, USCIS recommends approval of the EOIR-31 filed by [NAME OF ORGANIZATION].

Sincerely,

[DISTRICT DIRECTOR'S NAME]

District Director

## APPENDIX 12-4: SAMPLE DENIAL LETTER TO BIA RECOGNITION & ACCREDITATION PROGRAM COORDINATOR

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Name of Field Office  
Street Address  
City, State Zip Code



U.S. Citizenship  
and Immigration  
Services

[MONTH DAY, YEAR]

Recognition & Accreditation Program Coordinator  
Executive Office for Immigration Review  
Board of Immigration Appeals, Clerk's Office  
Post Office Box 8530  
Falls Church, VA 22041

Subject: Form EOIR-31 "Request for Recognition as a Non-Profit Religious, Charitable, Social Service, or Similar Organization" of [NAME OF ORGANIZATION]: **USCIS Recommendation Against Approval**

Dear Coordinator:

On [DATE], this office received a "Request for Recognition as a Non-Profit Religious, Charitable, Social Service, or Similar Organization" (EOIR-31) filed by [NAME OF ORGANIZATION]. USCIS has reviewed Form EOIR-31, conducted an inquiry, and in compliance with 8 CFR 292.2(b) submits its recommendation to the Board of Immigration Appeals (BIA).

USCIS recommends that the BIA **not** approve the Form EOIR-31 filed by [NAME OF ORGANIZATION]. In determining whether to submit a recommendation for or against approval of the EOIR-31 filed by [NAME OF ORGANIZATION], this office reviewed Form EOIR-31, evidence of non-profit status, proposed fees, the type of services that will be provided, and evidence that the organization possesses sufficient knowledge, information, and experience in immigration law to provide adequate services to USCIS applicants. This included a review of relevant training certificates, letters from attorneys or other BIA recognized organizations, and awards given to [NAME OF ORGANIZATION].

Based on this review, this office has determined that the organization does not appear to meet the qualifications for BIA recognition for the following reasons: [PICK ALL THAT APPLY]

- [NAME OF ORGANIZATION] does not appear to have adequate training in or knowledge of immigration law to be able to provide immigration legal services to USCIS applicants and petitioners.

- [NAME OF ORGANIZATION] has not demonstrated that it has reliable and ongoing access to legal supervision by an attorney with immigration legal expertise.
- [NAME OF ORGANIZATION] proposed fees do not qualify as “nominal” charges.
- In the course of its review, the district office has determined that [NAME OF ORGANIZATION] is the subject of a current investigation or prosecution for violations relevant to the EOIR-31 (e.g., consumer fraud, unauthorized practice of law, etc.).
- [NAME OF ORGANIZATION] has not established that it is a non-profit religious, charitable, social service or similar organization.

**If applicable:**

This office has also conducted background checks, reviewed media reports and other public sources, consulted with the state bar [OR OTHER STATE/LOCAL AUTHORITIES, IF APPLICABLE], and has found adverse information regarding [NAME OF ORGANIZATION]. [PROVIDE A SUMMARY OF ADVERSE INFORMATION IN THIS SECTION].

**If USCIS has met with the organization:** In addition, the District Office staff has visited the [NAME OF ORGANIZATION] offices and met with both leadership and staff members. During this meeting, [NAME OF ORGANIZATION's] staff did not demonstrate the ability to provide immigration legal services.

**If USCIS has not met with the organization:** Representatives or employees of [NAME OF ORGANIZATION] have never visited the [XX] District Office. Despite attempts to contact the organization to discuss its interest in pursuing BIA recognition, USCIS has been unable to reach the organization or has not been able to obtain enough information to establish that the organization merits a favorable recommendation that it be granted recognition.

The EOIR-31 request filed by [NAME OF ORGANIZATION] has not established that it makes only nominal charges and assesses no excessive membership dues for persons given assistance nor that it has at its disposal adequate knowledge, information and experience, as required by 8 CFR 292.2(a). USCIS does not recommend approval of the EOIR-31 filed by [NAME OF ORGANIZATION].

Sincerely,

[DISTRICT DIRECTOR'S NAME]

District Director