



U.S. Citizenship and Immigration Services

Questions and Answers

USCIS Asylum Division Quarterly Stakeholder Meeting

Tuesday, February 7, 2017

Tomich Center

111 Massachusetts Avenue, NW

Washington, D.C. 20001

2:00 pm – 4:00 pm EST

I. Welcome, Introductions and Presentation by:

International Operations, HQ DHS/USCIS/RAIO

II. Asylum Division Updates

- a. Joe Langlois has accepted the position of Europe, the Middle East and Africa (EMEA) District Director in the Rome, Italy office.
- b. Jennifer Higgins was selected as Associate Director for RAIO.
- c. Peter Haertling was selected as the New Orleans Sub-Office Director. His EOD is not yet established.
- d. Training Dates -
RAIO CT/ADOTP (formerly RAIO CT/ADOTC) #703 and #704 (concurrent classes): February 14, 2017 through March 23, 2017
- e. Regularly Provided Statistics (posted on USCIS.Gov) -
Affirmative Asylum Statistics (October 2016 – December 2016)
NACARA Statistics (October 1999 – December 2016)
Credible Fear and Reasonable Fear Statistics and Nationality Reports (October 2016 – December 2016)
Unaccompanied Alien Children Statistics (October 2016 – December 2016)

As a reminder, we started publishing the regularly provided statistics on the USCIS.gov website before the quarterly engagement so you can review them prior to the meeting and print a copy if you so choose.

- f. **Biometrics Scheduling Update** - The USCIS Asylum Division is in the process of transitioning to a new biometrics scheduling process to improve the overall customer experience at Application Support Centers (ASCs). As part of this transition, we will revise the ASC notices to include a specific date and time for ASC appointments. Some applicants may have received these new appointment notices during the month of December 2016 and January 2017, but the full transition for all Form I-589 and Form I-881 filings will occur over the next few months. During the transition, customers may experience a minor delay in receiving ASC appointments. Customers who filed more than 3 weeks ago and have not received an appointment notice should contact the asylum office with jurisdiction over the case to request a new ASC appointment.

III. **I-730 Asylee Relatives**

- a. Who will adjudicate cases at the Consulate (USCIS International or Department of State)?

Response: USCIS international field office will adjudicate the I-730s.

- b. Will USCIS issue Requests for Evidence (RFEs) or Notice of Intent to Deny (NOIDs) to let a person cure some potential or perceived defect in the filing? Or will there be straight denials?

Response: USCIS will issue RFEs/NOIDs to provide the petitioner an opportunity to cure an eligibility concern.

- c. If a case is denied, where should appeals and/or Motions to Reopen be filed? Should they be filed with the AAU or with the USCIS abroad that issued the denial?

Response: Form I-290B should be filed following directions on the Denial Notice. For cases adjudicated by USCIS international field offices, the Form I-290B should be filed with the Dallas Lockbox. See: <https://www.uscis.gov/i-290b-addresses>.

- d. Will there be an appeals process or system in place to challenge a determination from the Consulate?

Response: Currently, petitions are adjudicated only by USCIS.

- e. Given this new system, has USCIS put in place a procedure to notify Counsel in the US about the steps being taken (i.e. beneficiaries being scheduled for interviews)?

Response: Yes, all notices are being issued to beneficiary, petitioner and any representative on record.

- f. From our experience, communication via email with the Consular section of the US Embassies can take a long time because they receive inquiries from the general public as well. Will there be a channel of communication for attorneys of record?

Response: Consular sections are currently not adjudicating I-730s.

- g. Will NSC consider providing a webinar on this topic with more details? We recently participated at the Asylum Division quarterly meeting via conference call and some of this was discussed, but feel that we need a more in depth discussion on step by step.

Response: USCIS RAIO has the lead on the new I-730 process. Please submit any questions to the Asylum Quarterly POC. If enough questions are received, we will evaluate whether a webinar on the expansion of the new I-730 process is necessary.

Adjustment of Status for applicants paroled as Refugees:

We have recently come across clients that are refugees and were resettled to the US (as per the memo from USCIS Asylum Division and the travel foil show). However, the code in their EAD says they were **Paroled as refugees [(a)(4) category]**. This seems to be different than ADMITTED as refugees.

One of my questions is if they will be eligible for adjustment after being in the US for 1 year under parole or if they need to do something else. The stamp in their I-94s say **paroled as Refugee under 212 (b)(5)(d)** (which is different of Admitted under Section 207).

Additionally, this is causing them to have a restricted SSN, given that the list of evidence doesn't include this type of I-94 stamp. The clients are from Iran, so is there a chance that these are Lautenberg amendment cases (family reunification) and maybe this has something to do with the stamp being different? They have been told by the Resettlement agency that they would be contacted by USCIS when it's time to adjust, but that has not happened. Could you please shed some light into this scenario?

Response: Any individual, who is paroled as a refugee, has not been admitted as a refugee, and therefore cannot apply to adjust status as a refugee. Parole does not lead to any immigration status. A small number of individuals, including some who cannot be admitted to the United States as refugees because of the applicability of certain inadmissibility grounds, have been paroled into the United States as refugees. Because they have been paroled as refugees, they are entitled to refugee resettlement assistance. We would defer to HHS any question you have about eligibility for resettlement or other federal benefits.

(From: Carolina Sheinfeld, Project Coordinator, Torture Survivors Project, Legal Aid Foundation of Los Angeles, 5228 Whittier Blvd., Los Angeles, CA 90022; Office: (213) 640 3933; Direct: (213) 6403911; Email: csheinfeld@lafla.org)

IV. Asylum Cases Regarding the Bangladesh Nationalist Party (BNP)

- a. Many, if not all, Bangladesh BNP cases are being held up at Headquarters for an unreasonably long time. At this point, if cases are referred to an IJ in New York, it may be 3

or more years before the applicant has his day in court. Elections in Bangladesh are to be held in January 2019. If all BNP cases are held up at HQ for so long that the government changes and if BNP returns to power, it will truly be justice delayed is justice denied, for all BNP cases. Follow ups with the asylum offices go unanswered. What can be done to expedite the processing of these cases?

Response: Bangladesh Nationalist Party (BNP) cases are being reviewed alongside the other cases that were on hold pursuant to the previous Asylum TRIG Hold policy, which was revised on October 5, 2016. If you would like to request that an individual case be expedited, please submit any documentation in support of your request to the asylum office where your case is pending.

- b. Applicants, who are victims of domestic violence, remain pending for years. What can be done to expedite these cases?

Response: Asylum cases involving victims of domestic violence, like other pending asylum cases, are processed pursuant to the Affirmative Asylum Scheduling Bulletin available on the USCIS website and therefore some of these cases may be pending in our backlog. As discussed at prior stakeholder engagements, credible fear and reasonable fear continue to be the Division's priorities for scheduling purposes. However, the Asylum Division continues to examine ways to streamline our affirmative asylum case processing and enhance staffing levels in response to our affirmative asylum backlog. Additionally, all of our asylum offices accept requests to expedite. If you would like to request that an individual case be expedited, please submit any documentation in support of your request to the asylum office where your case is pending.

(From: Elizabeth M. Barna, Esq., 305 Broadway, Suite 305, New York, New York 10007; 212-732-0497; Email: Emb1029@aol.com, Email: ElizabethBarnaLaw.com)

V. Interview Wait Time

- a. At the current pace, how many years can it take for someone to get a chance to be interviewed?

Response: It depends on numerous factors including the affirmative asylum and credible fear workloads of the office with jurisdiction over your case. All of our offices accept requests for expediting the scheduling of asylum interviews, and they all consider danger to family members in the country of feared persecution and extenuating medical conditions of the applicant as primary factors in deciding whether to grant the request. For more information affirmative asylum processing times, please see the Affirmative Asylum Scheduling Bulletin available at www.uscis.gov.

(From: Seme D. Ayane, Refugee Service Center, Program Manager, 1018 Monroe Street NE, Washington DC 20017, Telephone: (202) 266-3061; Fax: (202) 832-0159; Email: seme.ayane@catholiccharitiesdc.org)

VI. Nunc Pro Tunc I-589 Interview and Scheduling

- a. What is the average timeframe between when a request for a nunc pro tunc I-589 is received by the Arlington Asylum Office and an I-589 interview is scheduled in Atlanta?

Response: The ZAR Asylum Office responded that recently this has been approximately 2-3 months, given the timing of our circuit rides.

- b. What happens if the scheduling exceeds that average timeframe? Is there someone I can call and, if so, whom?

Response: The ZAR Asylum Office schedules the applicant for the next circuit ride. If an applicant or attorney has a NPT application that has been pending for significantly longer than this period of time, they can reach out to the ZAR Office at ZARRescheduleRequest@uscis.dhs.gov.”

(From: Bob Beer, Email: bob@bobbeer.com)

VII. Impact of Change of Address in the Asylum Interview Process

- a. As cases from the backlog are being scheduled, which are likely 3-4 years old, are asylum offices seeing an increase of no-shows because people have likely moved and not updated their address properly?

Response: After seeing a large decrease in cases processed for failure to appear from 12% in FY 14 to 6% in FY 15, we saw a slight increase to 8% in FY 16.

- b. Any plans of sharing the address information obtained from the change of address form (AR-11) online at USCIS with asylum offices? We currently print out the completed forms and mail to the asylum office. Only rarely, we do receive confirmations of the change around three months later.

Response: Asylum offices can be notified of a change of address automatically, if the customer follows the directions in the USCIS.gov website “File a change of address online” (<https://egov.uscis.gov/coa/addressChange.do>) including answering YES to the question: “Is this change of address for an application or petition currently in progress?”

The Change of Address Online system captures the data provided by a customer or the representative in one central location to fulfill two processes: 1) notifying USCIS that a customer has changed address and 2) in the case of a customer with a pending benefit request, informing the specific USCIS office of the change of address to ensure that asylum offices send mail to the proper address.

The electronic AR-11 submission is always processed when a customer or representative use the Change of Address Online tool. When completing the electronic submission form if

the customer responds that there is no application or petition currently pending with USCIS then only a confirmation of the AR-11 is provided. The data submission of all address change requests for the AR-11 is completed and the AR-11 system is updated overnight. In this instance, the asylum office would not become aware of the change of address, although the AR-11 system would be updated.

In order for the asylum office to receive notification of the online change of address, the customer or legal representative should indicate that “an application or petition is currently pending,” then indicate that the application pending is an I-589 and proceed to complete all information requested. By doing this, the customer will not only record the change of address on the AR-11 system, but will ensure that the following day (the information is updated overnight) the particular asylum office is notified. Additionally, the customer will receive two unique confirmation numbers: one for the AR-11 submission and the other for the pending asylum application.

This process will trigger an electronic request for the asylum office where the application is pending to update the asylum electronic system of records (RAPS) and ensure that all notifications from the asylum office to the applicant will be properly addressed.

(From: Kelly AuBuchon, Senior Attorney, Address: 2630 West Lafayette Boulevard, Detroit, MI 48216; Phone: (313) 964-4320 ext. 15; Email: FreedomHouseDetroit.org)

VIII. Public Posting of Updated Asylum Division Officer Training Course Modules

- a. Are there more recent Asylum Officer Basic Training Course Lesson Modules (AOBTCs) available than those currently available on the agency’s website?
- b. If so, which AOBTCs have been updated and when do you intend to post them publicly?
- c. If you do not intend to post them publicly, why not?
- d. What is current USCIS policy regarding making publicly available AOBTCs?

Response: The website is being revised to reflect the RAIO Combined Training structure and lesson plans. We are working in concert with the RAIO Directorate to review the policies regarding the posting of RAIO Lesson Plans.

(From: Blaine Bookey, Co-Legal Director; Center for Gender & Refugee Studies; University of California Hastings College of the Law, 200 McAllister Street, San Francisco, CA 94102; Tel: (415) 565-4877; Direct: (415) 703-8202; Email: bookeybl@uchastings.edu)

IX. Completion of Supplemental I-693 Paperwork

- a. Can blanket civil surgeons from the public health departments complete asylees Supplemental I-693 paperwork who had an exam overseas?

Response: No, the blanket civil surgeon designation for health departments is limited in scope. Health departments may only use the blanket designation to complete vaccination assessments for refugees seeking adjustment. The blanket designation does not cover asylees seeking adjustment. Asylees would need to visit a physician designated as a civil surgeon through the standard application process. See USCIS Policy Manual Volume 8, Admissibility, Part C, Civil Surgeon Designation and Revocation, Chapter 3, Blanket Civil Surgeon Designation: <https://www.uscis.gov/policymanual/HTML/PolicyManual-Volume8-PartC-Chapter3.html> (specifically Section A(3)).

(From: Jackie Tomlinson, RN; Tuberculosis/Refugee Program, Snohomish Health District, 3020 Rucker, Suite 200, Everett, WA 98201; Phone: 425.339.5225; Email: jtomlinson@snohd.org)

X. Children of Applicants for Asylum

- a. Due to the extended waiting period for the interview, minor children of the applicant in some case may reach 21 year at the moment of the interview (i.e. adjudication of Asylum petition). Some of applicants' children who are 16-17 years old at the moment of the asylum application are definitely minors and are included in their parents' application, but at the moment of the interview the children are over 21 and not considered children anymore. What are their options?

Response: Under the Child Status Protection Act (CSPA), unmarried children who turn 21 years of age after an asylum application was filed but prior to adjudication are still considered eligible for derivative asylum status and may remain as dependents on the asylum application.

The Child Status Protection Act (CSPA) amended Section 208(b)(3)(B) of the INA with respect to the definition of "child" for asylum applicants as follows:

"(B) CONTINUED CLASSIFICATION OF CERTAIN ALIENS AS CHILDREN. An unmarried child who seeks to accompany, or follow to join, a parent granted asylum under this subsection, and who was under 21 years of age on the date on which such parent applied for asylum under this section, shall continue to be classified as a child for purposes of this paragraph and Section 209(b)(3), if the alien attained 21 years of age after such application was filed but while it was pending."

(From: Vladislav Salaridze, Esq., Email: lcgattorney@gmail.com; 2999 NE 191 Street, Suite 709, Miami, Florida 33180; Immigrateful.com)

XI. Adding a Spouse to an Application

- a. Is there any procedure to add a spouse to asylum application if the applicant got married during extended waiting period, but before the interview? If yes, what is the procedure and will the beneficiary be allowed to work and receive employment authorization and social security for the extended waiting period?

Response: The current procedures for adding a dependent after the filing of the I-589 are found in Section III.E.I of the Affirmative Asylum Procedures Manual (AAPM) found on USCIS.gov. If the applicant wishes to add a dependent after filing but before asylum interview (and the dependent did not previously file an I-589), the principal files with the service center with jurisdiction over his or her address. If the dependent previously filed an affirmative asylum application as a principal applicant, the service center forwards the I-589 to the asylum office with jurisdiction over the address, if an attempt to file is made with the service center. Details of what the applicant needs to file are in the AAPM.

Once added to the I-589, the beneficiary is considered an asylum applicant for the purposes of work authorization and may apply for an Employment Authorization Document by filing Form I-765, Application For Employment Authorization. The beneficiary must meet the requirements described in the form instructions found online at <https://www.uscis.gov/i-765>.

(From: Vladislav Salaridze, Esq., Email: lcgattorney@gmail.com; 2999 NE 191 Street, Suite 709, Miami, Florida 33180; Immigrateful.com)

XII. Asylum Processing for Married Applicants

- a. I would like to know if a married person comes to the United States and applies for asylum but the spouse is still in the other country, how long could the process take before the couple is reunited in the United States?

Response: We are unable to answer this question with specificity because it depends on many factors. The processing time for an affirmative asylum application depends on the workload of the asylum office with jurisdiction over the asylum application. If USCIS or EOIR grants an applicant asylum status, he or she may file Form I-730, Refugee/Asylee Relative Petition, with USCIS. The overseas spouse will be interviewed by an appropriate U.S. Government official in accordance with DHS and Department of State procedures for asylee derivative interviews in the specific country.

(From: Rachel Dolce; racheltdolce@gmail.com)

XIII. Public Benefits Received by Applicants with Pending Asylum Applications

- a. What kind of public benefits can an asylum applicant family receive whose asylum application is pending? For how long the benefits last?
- b. Can an asylum applicant whose application is pending apply for EAC during 30 days after the application submitted?

Response: An applicant may not file a Form I-765, Application for Employment Authorization, within 30 days of filing an asylum application. The regulations state that “the application shall be submitted no earlier than 150 days after the date on which a complete asylum application submitted in accordance with 208.3 and 208.4 has been received.” See 8 CFR 208.7(a).

USCIS does not administer other public benefits provided to asylum applicants while an asylum application is pending.

(From: Tamara Tretyakova, Russian Miami Service, Inc. (For Profit Corp.; 622 E Hallandale Beach Blvd, Hallandale FL 33009; Phone: 754-703-4116; Cell: 305- 879- 6253; Email: russianmiamiservice@gmail.com)

XIV. **Timing of Security Processing for Asylum Applicants**

- a. What review and/or security processes are being undertaken for asylum applicants, and when are these processes started?

The reason for this question is that it seems that the vast majority of my cases involving Arab or Muslim applicants who were interviewed in 2014 and 2015 remain pending. If one or more security screening processes takes years, it would be helpful to begin at the time an individual's asylum biometrics are taken, so that the process will be complete by the time of the interview.

Response: USCIS Asylum Division security check procedures apply to all affirmative asylum applicants, regardless of nationality, race, or religion. We initiate biographic security checks shortly after filing and biometric security checks at the time the individual's biometrics are taken; however, some checks cannot be initiated until an officer is assigned to review the full A-file. Additional checks will be initiated after the interview if new information is obtained at that time. New information often arises from additional documents and biographic information not provided by the applicant until the interview; applicants and attorneys can help reduce delays by providing complete information and supporting documents at the time of filing and submitting new/supplemental documents well ahead of the day of the interview. We endeavor to begin all checks as early as possible in the process and we are constantly reassessing our procedures and our resources to find ways to enhance national security and efficiency where possible. Delays in receiving a decision can also arise based on complexities in individual cases that require additional consultation with headquarters.

(From: Toni Maschler; Bromberg, Kohler Maya & Maschler, PLLC; Address: 2011 Pennsylvania Ave., NW, Suite. 500, Pepperdine Bldg, 5th floor (on "I" St. between 20th St. and 21st St.), Washington, DC 20006; Phone: (202) 835-0660; Email: toni@bromberglaw.com)

XV. Asylum Officer Staffing and Statistics

- a. How many asylum officers do you currently have on staff? How many asylum officer positions do you expect to have funded through the FY 2017 budget? To the extent you are limited by office space for additional asylum officers, can you provide an update on your efforts to acquire more space? Relatedly, can you provide any updates on additional sub-offices in additional areas of the country?

Response: The Asylum Division is currently authorized 625. As of January 11, 2017, there are 527 number of Asylum Officer onboard. Many of these vacancies are the result of the new enhancement positions the Division received in FY 2017.

In regards to space acquisition and the potential for additional offices or sub-offices, USCIS continues to explore space options. No final decisions have been made at this time.

- b. How many refugee resettlement details do you expect to have to fill with asylum officers in FY 2017? How many total asylum officers will be lost to the Refugee Corps in 2017?

Response: This issue is under review due to the recent Executive Order. We have no information to provide at this time.

- c. Related to the recent hiring announcement of Supervisory Asylum Officers to be based at the family detention centers in Texas, can you discuss the initiative to have permanent staff at those centers? How do you expect this permanent staff to impact the Division's coverage of family detention centers?

Response: The Asylum Division's plan to place permanent staff at the Family Residential Centers (FRCs) in Texas is the result of operational and practical considerations. Trying to sustain a temporary workforce at the FRCs has been challenging, especially with regard to travel costs and the burden on our staff, who have to travel to the FRCs on a rotational basis.

Given the length of time the FRCs have been operational, as well as the amount of resources dedicated to this workload, permanently staffing the FRCs is the best option. The permanent staffing level will remain consistent with current detail level. We do not expect this transition to impact our coverage of the FRCs.

- d. Can you provide an update on the new sub-office in Virginia? Can you describe the role of the ZAC office and a breakdown of its current and expected workload?

Response: ZAC conducts telephonic credible fear and reasonable fear interviews arising out of various jurisdictions nationwide. ZAC's resources are deployed to asylum offices based on volume, need, and operational capacity. In FY 17, it is projected that ZAC will handle approximately between 13,000 – 15,000 credible fear and reasonable fear referrals in FY 17.

- e. Can you provide additional statistics related to the number of affirmative asylum applications filed by individuals who have resided in the United States for more than 10 years? How many such applications were filed last year? Where were they filed and what procedure was followed to handle such cases?

Response: In FY 16, the Asylum Division received over 21,000 cases filed by asylum applicants who listed 10 years or more since arriving in the United States. This was about 19% of new receipts. (This number only included applicants who listed a date of entry and did not leave that information blank.) Approximately 40% of these cases were received in the New York and Newark jurisdictions. We also received more than 1,600 cases filed by applicants with 8-9 years in the U.S. at the time of filing. We have not interviewed most of the new filings from FY 16 because it is our priority to interview cases with older filing dates first (after UAC).

In FY 17 through December, we received approximately 5,400 cases filed by asylum applicants with more than 10 years in the US, constituting about 15% of our new filings. We also received almost 400 cases filed by applicants with 8-9 years in the U.S. at the time of filing during the same time period.

- f. Can you discuss the plausibility of adding an additional priority category for affirmative asylum applications filed by individuals with derivative family members abroad?

Response: We do not track this information in our case management system and therefore would be unable to prioritize these cases systematically prior to interview scheduling. All of our offices accept requests for expediting the scheduling of asylum interviews, and they all consider danger to family members in the country of feared persecution and extenuating medical conditions of the applicant as primary factors in deciding whether to grant the request.

(From: B. Shaw Drake, Equal Justice Works Fellow, Refugee Protection Sponsored By Morgan Stanley and Simpson Thacher & Bartlett LLP; Human Rights First American Ideals. Universal Values; Phone: 646.595.1054; Email: DrakeS@humanrightsfirst.org)

XVI. Screening to Determine Applicants' Ability to Complete CFI or RFI

- a. What type of training do asylum officers receive related to screening for competency?

Response: Asylum officers do not receive training related to screening for competency. They are not medical professionals and do not screen individuals for competency. They

cannot, and should not, evaluate an individual's mental health status. All asylum officers do receive training on interviewing survivors of torture and other severe trauma during their mandatory five-week training. The training was developed in coordination with several experts in the field of working with survivors of torture and other severe trauma, and the experts conduct the training for asylum officers.

- b. What procedures should asylum officers follow if officers encounter an individual during a CFI or RFI who has previously experienced psychological trauma and is unable to provide complete responses to the interview questions?

Response: Asylum officers receive training on how different factors can impede communication during an interview, how to identify symptoms of Post-Traumatic Stress Disorder or other trauma-related conditions, and how interview techniques may be used to help elicit testimony from a survivor of torture or other serious trauma.

If an asylum officer finds that a person is unable to effectively communicate in the credible or reasonable fear interview, the asylum officer will coordinate with DHS personnel, including ICE Health Services Corps.

- c. What criteria do asylum officers rely on in order to determine whether the individual is competent enough to complete the CFI or RFI?

Response: As stated above, asylum officers are not medical professionals and do not screen individuals for competency or make competency determinations.

(From: Laura A. Lynch, Esq., Liaison Associate; American Immigration Lawyers Association; Address: 1331 G Street NW, Suite 300, Washington, DC 20005; Phone: 202.507.7627, Email: llynch@aila.org)

XVII. Unaccompanied Minor Applications Referred to HQ for Review

- a. Practitioners have heard from Asylum Office personnel anecdotally that many applications filed by UAC and entailing a family-based particular social group were being referred to HQ for review prior to decision. Also some practitioners noticed that some such cases remain pending several months. Can you provide an update on current policy on the categories of UAC cases that go to HQ for review?

Response: UAC cases do not comprise a separate category of cases that are required to come to Headquarters for review. However, UAC cases, like all affirmative cases, may require submission to Asylum Headquarters for review if they fall under another category that requires review.

(From: Wendy Wylegala, Deputy Director for Legal Technical Assistance; Kids in Need of Defense (KIND); c/o Lowenstein Sandler LLP; Address: 1251 Avenue of the Americas, New York, NY 10020; Phone: 862-926-2069; Email: wwylegala@supportkind.org)

XVIII. Scheduling Unaccompanied Minor Cases and Interview Observation

- a. Could you please explain the guidelines for scheduling unaccompanied children's cases? Some have been scheduled within a few weeks of filing while others have taken months to get interviews. If there is a standard procedure, could the asylum offices post a processing time bulletin as they do for adult affirmative cases so that counsel can appropriately prioritize among cases to prep?

Response: As described in the Affirmative Asylum Procedures Manual (AAPM) section II.G.2.c describing the scheduling priorities, generally, UAC cases are prioritized last in, first out by filing date depending on the date of entry provided on the form. UAC who arrived after May 1, 2014 are prioritized for interview before UAC who arrived before May 1, 2014.

- b. Can headquarters issue guidance that would allow a supervisor to attend an asylum interview to give feedback to a supervisee who has never represented a client at an asylum interview before? We have been told different things at different times about when this is allowed and who decides. We have heard that only law students attending interviews as part of a clinic can have a supervising professor present. We have been told that it's always up to the individual asylum officer. We have been told by individual asylum officers that it's not their decision. We understand that asylum interviews are non-adversarial and that officers do not want to be overwhelmed by counsel in the interview, but if the supervisor agrees to not speak, and there is feedback for the newer representative, what is the rationale to keep supervisors out? We think that everyone benefits from having better trained representatives.

Response: Thank you for raising this issue. We will evaluate your suggestion and follow up at a future meeting if a national policy is developed. We agree that better trained representatives are in everyone's best interests.

(From: Victoria Neilson; Legal Director; Immigrant Justice Corps; Address: 17 Battery Place, Ste. 236, New York, NY 10004; Office phone: 212-407-3417; Phone: 646-690-0482; Email: vneilson@justicecorps.org)