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April 13, 2026

Acting Attorney General Todd Blanche

EOIR Director Daren Margolin

**RE: Reinstate Staffing for the Department of Justice Recognition and Accreditation Program**

Dear Acting Attorney General Blanche and Director Margolin:

The Immigrant Legal Resource Center (ILRC) writes to demand that the Department of Justice (DOJ) immediately reinstate qualified staff to the Recognition and Accreditation (R&A) program, located in the Executive Office for Immigration Review (EOIR). The R&A program is a vital, low-cost mechanism that has served the American immigration system for nearly 70 years — providing affordable legal assistance to immigrants, combating fraud, and reducing the burden on immigration courts. Its effective operation depends on trained federal staff, and the recent removal of all program personnel with decision-making authority threatens to bring it to a complete halt.

**I. Organizational Interest: Background on ILRC**

The ILRC is a national non-profit organization that provides legal trainings, educational materials, and advocacy to advance immigrant rights. The ILRC's mission is to work with and educate immigrants, community organizations, and the legal sector to continue to build a democratic society that values diversity and the rights of all people. Since its inception in 1979, the ILRC has provided technical assistance on hundreds of thousands of immigration law issues, trained thousands of advocates, included accredited representatives and pro bono attorneys annually on immigration law, distributed thousands of practitioner guides, provided expertise to immigrant-led advocacy efforts across the country, and supported hundreds of immigration legal non-profit organizations in building their capacity.

A recent survey of our attendance at our regular webinars on immigration law shows that 50% or more of our learners are accredited representatives. In

addition, we produce a multi-volume set on immigration law, *A Guide for Immigration Advocates*, that provides an in-depth overview of immigration law for a week-long, 40-hour course. This course is taught annually by more than 400 recognized non-profit legal services organizations throughout the United States who train employees who are preparing to apply for accreditation. In addition, we publish comprehensive manuals on family-based immigration and humanitarian immigration benefits, all of which are also utilized to educate accredited representatives. ILRC is dedicated to increasing the availability of low-cost, qualified representation to immigrants, and the R&A program is central to that purpose.

Through our extensive network with service providers, immigration practitioners, and immigration benefits applicants, we have developed a profound understanding of the barriers faced by low-income immigrants of color seeking immigration benefits. The comments that follow are gleaned from the experiences of many low-income immigrants and the providers of legal services.

### **The Significance of the DOJ R&A Program**

Established in 1958, the R&A program authorizes Recognized Organizations – which are community-based organizations such as faith-based nonprofits, legal aid providers, and social service agencies – to offer immigration legal services through credentialed non-attorney staff known as Accredited Representatives. Today, the program impacts:

- More than 2,600 Accredited Representatives across the country.
- Almost 950 Recognized Organizations, including many faith-based providers and community organizations.
- Tens of thousands of clients each year, many of whom cannot afford a private attorney.
- Underserved communities where attorneys are scarce or unavailable.

The program is also the primary safeguard against *notario* fraud and the unauthorized practice of immigration law (UPII) — a persistent problem in immigration legal services that exploits vulnerable immigrant communities, complicates case management, and adds financial costs to EOIR and the Department of Homeland Security (DHS). By providing a credentialing program for legitimate, non-attorney providers, the R&A program effectively distinguishes between quality legal counsel and fraudulent services, thereby protecting immigrants from exploitation while simultaneously expanding access to reliable legal representation.

### **The Current Crisis**

In March of 2026, the media reported that staffing for the R&A program had been completely gutted, adjudicators reassigned, and pending applications held in limbo.<sup>1</sup> The R&A program requires trained adjudicators from EOIR to review and approve Forms EOIR-31 (applications for organizational recognition) and EOIR-31A (applications for individual accreditation). Historically, these applications were processed within 90 days — a standard that allows organizations to plan, staff, and serve their communities with professionalism and competence.

However, in 2025, processing times stretched to 6–8 months due to understaffing. Now, the abrupt reassignment of all permanent full-time federal staff from the program has created setbacks for legal service providers and EOIR itself. While the program technically continues to accept applications, there is nobody in the office to approve them. Thus, those applications are going nowhere. No new organizations can receive recognition. No new representatives can be accredited. Even routine renewals — required to maintain good standing — are in limbo. This undermines EOIR’s stated mission to expeditiously process as many R&A applications as possible in order to increase access to qualified immigration legal representation and streamline the department’s operations.

The consequences are severe and immediate:

- Organizations that have followed every rule cannot obtain or potentially renew their Recognition, jeopardizing their legal authority to serve clients.
- Accredited Representatives face career uncertainty as their credentials cannot be granted or renewed.
- Immigrants — including those in active removal proceedings — are losing access to the affordable legal services they depend on.
- Courts and adjudicators lose the benefit of well-presented cases, which are resolved more efficiently.
- The vacuum created by the program collapse will be filled by *notarios* and fraudsters, harming immigrants and the systems that govern them in this country.

### **Our Requests**

We call on the Department of Justice to take the following steps without delay:

- Reinstatement of trained adjudicators to the R&A program immediately, including senior officials with authority to issue decisions on Forms EOIR-31 and EOIR-31A.
- Restoration of the 90-day processing standard to ensure continuity for Recognized Organizations, Accredited Representatives, and the clients they serve.

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<sup>1</sup> CBS News, *DOJ guts office that helps indigent immigrants obtain affordable legal aid, sources say*, (March 23, 2026), <https://www.cbsnews.com/news/justice-dept-guts-office-helping-indigent-immigrants-affordable-legal-aid/>.

- Resume meaningful stakeholder engagement between EOIR and the organizations and communities that depend on the R&A program. A public program must be held accountable to those it affects.

R&A is a small program that delivers enormously: reducing court backlogs, preventing fraud, creating meaningful employment, and ensuring that immigrants have access to competent legal counsel regardless of their means or location. With over 11 million unadjudicated USCIS applications and more than 3.3 million cases pending before the immigration court, this is not the moment to dismantle one of the immigration system's most effective and affordable legal infrastructure programs.

Immigration advocacy organizations have partnered with EOIR for decades — providing services rooted in our faith traditions, our professional commitments, and our deep ties to the communities we serve. We stand ready to work constructively with DOJ to strengthen this program. But it must first be staffed and functional.

**We urge you to act now to restore the R&A program to full operation.**

Sincerely,  
Peggy Gleason  
Senior Staff Attorney  
The Immigrant Legal Resource Center