RESPONDING TO INAPPROPRIATE RFEs & NOIDs IN SPECIAL IMMIGRANT JUVENILE STATUS CASES [1]

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I. Description of the Problem

Increasingly, advocates have reported that in many Special Immigrant Juvenile Status ("SIJS") cases, United States Citizenship & Immigration Services ("USCIS") is requesting certain documents from their clients' state court proceedings, often including confidential information about children and youth, in order to make decisions in their cases.[2] In particular, in pending SIJS petitions, USCIS is requesting documents from state court files, and in some cases, entire state court files, through Requests for Evidence ("RFEs") and Notices of Intent to Deny ("NOIDs").[3] For example, an RFE in a Florida case requested a copy of "all records" from the judicial proceeding in which the petitioner was declared dependent, and noted specifically that the records must include the pleadings of the petitioner that contain all allegations and information, as well as a "full and complete transcript" of the proceedings. The RFE also suggested that other items that should be submitted included the petitions and any affidavits in support thereof. In another example in a case out of Minnesota, an RFE requested, among other things, all documents submitted to the court in support of the Custody Case, as well as a transcript of the court hearing.[4]

The rationale for these requests is not always apparent on the face of the RFE or NOID, but it appears to stem from USCIS exercising increasing scrutiny of SIJS petitions in an effort to determine whether the underlying state court action was initiated primarily for an immigration benefit, rather than to obtain relief from abandonment, abuse, or neglect. For the reasons discussed below, these requests for additional documentation are often unnecessary under the plain language of the statute, misunderstand USCIS's role in the SIJS adjudication process, and may require practitioners to share documents in violation of state confidentiality laws.

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[2] For an overview of SIJS, see ILRC, *An Overview to Special Immigrant Juvenile Status*, http://www.ilrc.org/resources/an-overview-to-special-immigrant-juvenile-status-updated-march-2015.

[3] *See* 8 C.F.R. § 103.2(b)(8) *et seq.* for additional information on RFEs and NOIDs, including regulations requiring that derogatory information unknown to the petitioner or applicant be disclosed prior to a decision.

[4] The ILRC is aware of similar RFEs and NOIDs in locations including: New York, New Jersey, Georgia, North Carolina, Colorado, Washington D.C., Illinois, Missouri, and Texas.

II. Factual Scenarios in Which RFEs/NOIDs Are Increasingly Common

Practitioners have reported that RFEs/NOIDs are increasingly common in cases that contain the following recurring fact patterns:

- 1-parent SIJS cases, particularly those involving death or abandonment by the non-custodial parent;
- Cases based on temporary dependency or custody orders;
- Cases where the father is not listed on the birth certificate and the state court has found that reunification with the father is not viable due to abandonment;
- Cases where the child obtained the SIJS predicate order close to the age of 18 or 21;
- Cases where the child allegedly made statements to U.S. Customs and Border Protection ("CBP") upon his or her apprehension that conflict with something contained in the SIJS application, or where the child did not mention the abandonment, abuse, or neglect to CBP upon his or her apprehension.[5]

The common thread in all of these scenarios is that in one way or another, USCIS is questioning whether the state court action was initiated primarily for an immigration benefit. In most of these scenarios, USCIS requests additional evidence from the child, almost always including documents from the state court file or even the entire state court file. For the reasons listed below, this is very often an inappropriate action on the part of USCIS. That impropriety should shape how advocates respond to RFEs.

III. USCIS's Consent Function

Although RFEs and NOIDs are often boilerplate and the reasons for them are not always clear, USCIS seems to be sending these RFEs and NOIDs under its "consent" authority. USCIS's consent function derives from the SIJS statute, which sets forth the eligibility requirements for SIJS, including "an immigrant who is present in the United States…(iii) in whose case the Secretary of Homeland Security consents to the grant of special immigrant juvenile status."[6] The statute itself does not provide a standard governing when the Secretary of Homeland Security (whose authority has been delegated to USCIS) should consent. However, USCIS has formulated a standard, though it articulates the standard differently in different guidance.[7] One common expression of the consent

[5] USCIS typically uses the child's Form I-213 as derogatory evidence in these scenarios. For example, in one case, USCIS used an I-213 from 2011 to support an RFE/NOID in 2015. There, the USCIS officer faulted the child for failing to disclose his abandonment to CBP at the border and for allegedly stating to CBP that he had lived with both his parents in his home country.

[6] 8 U.S.C. § 1101(a)(27)(J)(iii).

[7] *Compare* USCIS Memorandum, William R. Yates, "Regarding Field Guidance on Special Immigrant Juvenile Status Petitions, Memorandum #3," HQADN 70/23 (May 27, 2004), p. 4 [hereinafter, "Yates Memorandum"] (stating that: "[C]onsent should be given only if the adjudicator is aware of the facts that formed the basis for the juvenile court's rulings on dependency (or state custody), eligibility for long-term foster care based on abuse, neglect, or abandonment, and non-viability of family reunification, or the adjudicator determines that a reasonable basis in fact exists for these rulings."), *with* USCIS Memorandum, "Trafficking Victims Protection Reauthorization Act of 2008: Special Immigrant Juvenile Status Provisions," HQOPS 70, 8.5, p. 3 (Mar. 24, 2009) [hereinafter "Neufeld Memorandum"] ("The consent determination by the Secretary, through the USCIS District Director, is an acknowledgement that the request for SIJ classification is bona fide. This means that the SIJ benefit was not 'sought primarily for the purpose of obtaining the status of an alien lawfully admitted for permanent residence, rather than for the purpose of obtaining relief from abuse or neglect or abandonment.'" (citing H.R. Rep. No. 105-405, at 130 (1997))), *and* USCIS Memorandum, "Response to Recommendation 47, Special Immigrant Juvenile (SIJ) Adjudications:

function – untethered to the plain language of the statute, regulations, or the statutory framework for SIJS, and instead based on scant legislative history from 1997 – is that USCIS looks to see whether the state court order was sought primarily for the purpose of obtaining relief from abuse, abandonment, or neglect, and not primarily for the purpose of obtaining lawful permanent residency.[8] This is sometimes referred to as the "primary purpose" inquiry.

This particular explanation of the consent function has created confusion both within USCIS and among advocates because it suggests that the SIJS predicate order *itself* ought not to be sought for an immigration benefit. This, of course, is senseless because the state court issues the SIJS predicate order precisely so that it can be given to USCIS in support of immigration relief. Accordingly, the only reasonable interpretation of this iteration of the consent function is that USCIS looks to see whether the *underlying action in state court* was initiated primarily for an immigration benefit.[9] But again, even this interpretation of the consent function appears to be based in policy considerations rather than law. An understanding of the consent function that is consistent with the SIJS statute would instead provide that USCIS should verify that the state court order contains the requisite findings, and that the applicant has provided a brief statement of the factual basis for the state court's findings.

IV. Recommended Arguments for Responding to Inappropriate RFEs/NOIDs Requesting Documents from the State Court File and/or Questioning the "Primary Purpose" of the State Court Action

In general, advocates are advised *not* to provide extensive documentation from the state court proceedings, but rather to make any of the following arguments that are relevant and appropriate in the given case:[10]

A. *It is inappropriate for USCIS to scrutinize SIJS cases under the "primary purpose" framework, which is not based in the statute or regulations, and which ignores the reality that in many cases, protection from deportation is essential to obtaining relief from parental abuse, neglect, or abandonment.* As noted above, the "primary purpose" language is not contained in the statute or current regulations. Moreover, this framework is at odds with the reality for

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An Opportunity for Adoption of Best Practices," p. 4 (Jul. 13, 2011) [hereinafter "Response to Recommendation 47"] (stating: "Based on legislative history, USCIS looks to see if the state court order was sought primarily for the purpose of obtaining relief from abuse, abandonment, or neglect and not primarily for the purpose of obtaining lawful immigration status." (citing H.R. Rep. No. 105-405, 105th Cong., 1st Sess., at 130 (1997)).

[8] This formulation does not appear anywhere in current law, though it was reflected in the proposed SIJS regulations in 2011, which have not gone into effect, and which prompted extensive feedback at the time of publication. *See* Federal Register Vol. 76, No. 172, Proposed Rules (Sept. 6, 2011), *available at* http://www.justice.gov/sites/default/files/eoir/legacy/2011/09/15/fr06sept11.pdf ("In determining whether to provide consent to classification as a special immigrant juvenile as a matter of discretion, USCIS will consider, among other permissible discretionary factors, whether the alien has established, based on the evidence of record, that the State court order was sought primarily to obtain relief from abuse, neglect, abandonment, or a similar basis under State law and not primarily for the purpose of obtaining lawful immigration status; and that the evidence otherwise demonstrates that there is a bona fide basis for granting special immigrant juvenile status.") Comments submitted on the proposed regulations are available at: http://www.regulations.gov/#!docketBrowser;rpp=25;po=0;dct=PS;D=USCIS-2009-0004.

[9] However, even this interpretation is not consistent with how USCIS exercises its consent function in practice. For example, USCIS has questioned whether a youth who applied for SIJS after being placed in delinquency proceedings was primarily seeking an immigration benefit. There is absolutely no evidence to suggest that children are committing delinquent acts in hopes of obtaining Special Immigrant Juvenile Status.

[10] While it is generally not advisable to provide documents from the state court proceedings, individual practitioners of course must determine, with the individual client, whether to provide some limited documents from the state court in order to best advocate for that client. One such scenario may be when a child is nearing or already past the age of 21 and so could not re-file her I-360 if USCIS denied it (at the field office and appellate levels) for failure to provide documentation.

many immigrant youth escaping parental abuse, neglect, or abandonment. USCIS itself has recognized that immigration relief may be tied in with relief from parental abuse, neglect, or abandonment. In fact, recent USCIS training materials note that "a mixed motive [of obtaining immigration relief and seeking relief from abuse, neglect, or abandonment] is acceptable and common."[11]

B. *It is inappropriate under the plain language of the federal SIJS statute for USCIS to request documents in the state court file.* The structure and plain language of 8 U.S.C. § 1101(a)(27)(J) make clear that determinations of dependency, legal commitment, custody, and the non-viability of reunification with one or both parents due to abuse, neglect, abandonment, or a similar basis found under State law are within the purview of a state juvenile court, and not USCIS. In addition, the structure and plain language of the SIJS statute make clear that determinations of the child's best interest are to be made in administrative or judicial proceedings, and not by USCIS.

C. *It is inappropriate under the federal regulations[12] that implement the SIJS statute for USCIS to request documents in the state court file.* Under 8 CFR § 204.11(c), which outlines the eligibility requirements for SIJS, determinations about the child's dependency, eligibility for long-term foster care,[13] and best interests clearly are to be made by a juvenile court and in accordance with state law governing such determinations.[14]

D. *It is inappropriate under USCIS's own policies governing the adjudication of SIJS petitions for it to request documents in the state court file.*

- Per the Yates Memorandum, in exercising the consent function, "[t]he adjudicator generally should not second-guess the court rulings or question whether the court's order was properly issued. Orders that include or are supplemented by specific findings of fact as to the above-listed rulings will usually be sufficient to establish eligibility for consent. Such findings need not be overly detailed, but must reflect that the juvenile court made an informed decision."[15] Thus, it is inappropriate for USCIS to question whether a state court order that is valid on its face was properly issued by seeking to review the underlying documents.
- The 2011 Ombudsman Recommendation to the Director of USCIS specifically requests that USCIS "[c]ease requesting the evidence underlying juvenile court determinations of foreign child dependency."[16] In particular, the Recommendation notes that: "USCIS is permitted to inquire as to whether the juvenile court judge made a finding of abuse,

[11] USCIS, "Detailed Q & A, Looking Behind Juvenile Court Order," AILA Doc. No. 15043014 (posted on 05/04/15).
[12] Note that the federal regulations implementing the SIJS statute, found at 8 C.F.R. § 204.11, have not yet been updated to reflect substantial changes made to the statute in 2008 via the Trafficking Victims Protection Reauthorization Act of 2008, Pub. L. No. 110-457, 122 Stat. 5044 (2008). As such, the regulations are superseded by the statute to the extent they conflict with it.
[13] Note that this prong of the statute has since been replaced by the requirement that the court find that reunification is not viable with one or both parents due to abandonment, abuse, neglect, or a similar basis found under State law. *See* 8 U.S.C. § 1101(a)(27)(J)(i). Nonetheless, the regulations' treatment of this prong of the statute gives insight into how USCIS should view a state court's determination regarding the non-viability of reunification.
[14] *See, e.g.*, 8 C.F.R. § 204.11(c)(3) (stating that an eligibility requirement for SIJS is that the child "[h]as been declared dependent upon a juvenile court located in the United States in accordance with state law governing such declarations of dependency, while the alien was in the United States and under the jurisdiction of the court").
[15] Yates Memorandum, pp. 4-5.
[16] USCIS Ombudsman Recommendation, "Special Immigrant Juvenile Adjudications: An Opportunity for Adoption of Best Practices" (Apr. 15, 2011), p. 2.

neglect or abandonment. However, it is expressly prohibited from engaging in a *de novo* review of the facts and circumstances underlying the determination of dependency."[17] The Ombudsman Recommendation further reminds USCIS that the statute explicitly vests state juvenile courts with making dependency determinations, and that "USCIS is not vested with authority to make dependency determinations. It is not empowered to engage in post-decision legal or factual review of such decisions and it lacks the expertise possessed by state tribunals specializing in family law."[18]

- The USCIS Response to Recommendation 47 states that "[t]he consent function is essentially a discretionary determination that the petition is *bona fide* and that there is a reasonable basis for the agency's consent to the SIJ classification. Juvenile court orders that include or are supplemented by specific findings of fact regarding the basis for a finding of abuse, abandonment, or neglect are usually sufficient to provide a basis for consent. Orders that lack specific findings may not be sufficient, and may need to be supplemented by separate findings or other relevant evidence to establish the factual basis for the order."[19] Further, the Response to Recommendation 47 recognizes that USCIS cannot and should not attempt to re-determine findings made under the relevant state law.[20] Accordingly, per USCIS's own guidance, so long as the applicant has satisfied this threshold of providing "orders that include or are supplemented by specific findings of fact,"[21] no further inquiry from USCIS should follow.
- Recent fact sheets published by USCIS also make clear that USCIS views the role of the juvenile court as making factual findings based on state law, and that the juvenile court order "need not be overly detailed, and need not recount all of the circumstances of the abuse, abandonment or neglect, but must show the factual basis for the court's findings."[22]
- The USCIS Policy Manual states: "[i]f the court order lacks specific facts to support the required dependency, reunification and best interests findings or the evidence provided does not establish a reasonable factual basis for the order, the officer may request additional evidence. Findings do not need to be overly detailed but must reflect that the court made an informed decision. . . . The officer should not second-guess the court ruling or reweigh the evidence. Orders that have the necessary rulings and include or are supplemented by specific findings of fact will usually be sufficient to establish eligibility."[23]
- Recent USCIS training materials, recently obtained by the American Immigration Lawyers Association via a FOIA request, note that in certain circumstances – when the state court predicate order contains boilerplate language and the application otherwise does not provide information on the facts that formed the basis of the court's findings – USCIS may request additional evidence of the basis for the court's findings but underscores

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[17] *Id.* at 6.
[18] *Id.* at 7.
[19] USCIS Response to Ombudsman Recommendation 47, p. 4.
[20] "In some cases, USCIS may request further evidence from the petitioner of the factual basis for the juvenile court order if the initial evidence is insufficient. Such a request is not a re-examination of the state court's determination. USCIS recognizes that it does not have the jurisdiction or expertise to evaluate a child's claim of parental abuse, neglect, or abandonment under the relevant state law." *Id.*
[21] *Id.*
[22] USCIS, "Special Immigrant Juvenile Status: Information for Juvenile Courts," *available at* http://www.uscis.gov/sites/default/files/USCIS/Green%20Card/Green%20Card%20Through%20a%20Job/Information_for_Juvenile_Courts_-FINAL.pdf; *see also* USCIS, "Immigration Relief for Abused Children," *available at* http://www.uscis.gov/sites/default/files/USCIS/Green%20Card/Green%20Card%20Through%20a%20Job/Immigration_Relief_for_Abused_Children-FINAL.pdf ("The role of the court is to make factual findings based on state law about the abuse, neglect, or abandonment, family reunification, and best interests of the child.").
[23] USCIS Policy Manual, Volume 6: Immigrants, Part H – Special Immigrant Juveniles, p. 7-8.

that "[d]etermining abuse, neglect, or abandonment (or a similar basis) is NOT a determination for USCIS."[24]

E. *It is unnecessary for USCIS to request any documents underlying the state court petition when the applicant has already provided the factual basis for the state court order.* As demonstrated above, the federal statute and regulations, as well as USCIS's own policy guidance, recognize that so long as the applicant has provided evidence of the factual basis for the state court order, further documentation in the form of underlying documents from the state court proceedings is not necessary.

F. *It is inappropriate for USCIS to request the state court file when it is aware that state confidentiality laws may, and often do, prevent disclosure of juvenile state court files, especially when such files contain sensitive information regarding child abuse, abandonment and neglect.*

- In the context of SIJS petitions, USCIS has recognized that state confidentiality laws may prevent disclosure of documents from the juvenile court file.
    - The Yates Memorandum states that "adjudicators must be mindful that confidentiality rules often restrict disclosure of records from juvenile-related proceedings, so seeking such records directly from the court may be inappropriate, depending on the applicable State law."[25]
    - The USCIS Policy Manual states: "An officer must be mindful of confidentiality rules that may restrict disclosure of records from juvenile-related proceedings."[26]
- In the DACA context, USCIS has officially recognized that state court files may be confidential, and disclosure may be prohibited under state law.
    - *See* Form I-821D, page 4, part 4, Question 1:

"Have you **EVER** been arrested for, charged with, or convicted of a felony or misdemeanor, *including incidents handled in juvenile court*, in the United States? Do not include minor traffic violations unless they were alcohol- or drug-related. Yes No

If you answered "Yes," you must include a certified court disposition, arrest record, charging document, sentencing record, etc., for each arrest, unless disclosure is prohibited under state law.

(Emphasis added.)

- *See* Form I-821D Instructions, page 10, Question 12:

What evidence should I submit to demonstrate my criminal history?

[24] USCIS, "Detailed Q & A, Looking Behind Juvenile Court Order," AILA Doc. No. 15043014 (posted on 05/04/15).
[25] Yates Memorandum, p. 5.
[26] USCIS Policy Manual, Volume 6: Immigrants, Part H – Special Immigrant Juveniles, p. 8.

If you have been arrested for or charged with any felony *(i.e., a Federal, state, or local criminal offense punishable by imprisonment for a term exceeding one year)* or misdemeanor *(i.e. a Federal, state, or local criminal offense for which the maximum term of imprisonment authorized is one year or less but greater than five days)* in the United States, or a crime in any country other than the United States, you must submit evidence demonstrating the results of the arrest or charges brought against you. If the charges against you were handled in juvenile court, and the records are from a state with laws prohibiting their disclosure, this evidence is not required…

(Emphasis in underline added).

V. Recommendations on Responding to USCIS's Use of I-213s

In general, advocates are advised to challenge USCIS's using a child's I-213 to support a NOID or RFE. Information in I-213s is often incorrect. Even when it is correct, its use is often inappropriate.

A. *It is inappropriate for USCIS to rely upon statements contained in the I-213 to question a child's credibility and exercise its consent function in light of well-established principles of child welfare*. Children cannot be presumed capable of disclosing their entire history, particularly painful parts, to a uniformed CBP agent at a border detention facility where they are most often frightened, traumatized, and unrepresented. Nor should USCIS expect them to. It certainly would not in other contexts.[27] Experience bears out children's difficulty at the border.[28] Thus with humanitarian, psychological, and legal justification, a child should not be faulted for failing to cry "abandonment" or "abuse" at the border. Further, given CBP's lack of training in trauma-informed, child-sensitive interviewing, it is unlikely that CBP accurately captures children's information during its interviews. In fact, in case after case, advocates are finding serious flaws in I-213s that undermine their reliability. Thus, information contained in I-213s should not be used to question a child's credibility, nor to assert that, for example, where the child did not mention the abandonment, abuse, or neglect when initially being interviewed by CBP, this calls into question their motivation in later availing themselves of state court protection.

B. *It is inappropriate for USCIS to rely upon statements contained in the I-213 to question a child's credibility and exercise its consent function under USCIS's own policy guidelines.* USCIS itself recognizes the inherent weaknesses of I-213s in the SIJS context: "An officer should generally limit reliance on records containing statements made by juveniles at the time of initial apprehension by immigration or law enforcement. Oftentimes juveniles do not share personal accounts of their family life with an unknown adult until they have had the opportunity to form a trusting relationship with that adult. Additionally, the juvenile court may

[27] See USCIS, Asylum Officer Basic Training Course, *Credible Fear* at 19 (April 14, 2006); s*ee also Li v. Ashcroft*, 378 F.3d 959, 962-63 (9th Cir. 2004) (the court "hesitate[s] to view statements given during airport interviews as valuable impeachment sources because of the conditions under which they are taken and because a newly-arriving alien cannot be expected to divulge every detail of the persecution he or she sustained.").
[28] See Center for Gender and Refugee Studies et al., *Childhood and Migration in Central and North America* at 311-14 (2015).

make child welfare placement, custody and best interest decisions that differ from the juvenile's stated intentions at the time of apprehension."[29]

VI. Recommendations for Setting Your Case Up to Avoid RFEs/NOIDs

While the above recommendations will help the practitioner who has already received an RFE or NOID, practitioners can also be strategic from the outset in SIJS cases to hopefully avoid this type of RFE or NOID altogether. Advocates are thus encouraged to submit SIJS petitions to USCIS that comply with the following recommendations:

A. *Include a Brief Factual Basis in the State Court Order.* USCIS has repeatedly provided guidance indicating that "[j]uvenile court orders that include or are supplemented by specific findings of fact regarding the basis for a finding of abuse, abandonment, or neglect are usually sufficient to provide a basis for consent. Orders that lack specific findings may not be sufficient, and may need to be supplemented by separate findings or other relevant evidence to establish the factual basis for the order."[30] Accordingly, to head off RFEs/NOIDs from the beginning, advocates are encouraged to have the court include a brief statement of the facts supporting the SIJS findings in the predicate order. For example, a state court order may include the following information in support of the reunification and best interest findings:

- *The minor is unable to reunify with her father due to abuse, and unable to reunify with her mother due to abandonment. Specifically, minor's father was physically and emotionally abusive to the minor. The father hit the minor with a belt on a weekly basis, leaving bruises and welts on the minor's body. Further, the father repeatedly told the minor that she was good for nothing. In addition, the minor's mother abandoned her at the age of 4 and has not communicated with the minor since that time or provided any financial support.*
- *It is not in the minor's best interest to return to El Salvador. The minor has no one to care for her in the home country. The minor was threatened by the MS-13 gang when she lived in El Salvador, and was assaulted by the same gang on one occasion. It is in the minor's best interest to remain in the United States, where she is safe in the custody of her guardian and attending high school.*

B. *Emphasize the Basis Under State Law for the State Court Action.* When filing the SIJS petition with USCIS, emphasize the basis under state law for the action in state court. Advocates may include this information in their cover letter or in a case summary filed with the application, or it could also be set forth in the state court order itself. Demonstrating the valid basis under state law for the state court action should head off

[29] USCIS Policy Manual, Volume 6: Immigrants, Part H – Special Immigrant Juveniles, at 8.
[30] Response to Recommendation 47, p. 4; *see also* USCIS, "Immigration Relief for Abused Children: Information for Juvenile Court Judges, Child Welfare Workers, and Others Working with Abused Children," *available at* http://www.uscis.gov/sites/default/files/USCIS/Green%20Card/Green%20Card%20Through%20a%20Job/Immigration_Relief_for_Abused_Children-FINAL.pdf ("DHS must consent to the grant of SIJ classification. This means that for a child to be eligible for SIJ status, DHS must determine that the court order was sought primarily for protection from abuse, neglect or abandonment, rather than primarily to obtain an immigration benefit. Template orders are usually not sufficient to establish this. The court order should include the factual basis for the findings on parental reunification, dependency/custody, and best interests.")

inappropriate questioning from USCIS, and make it more apparent that when USCIS does engage in such analysis, they are improperly questioning the state court's authority.

VII. Conclusion

In light of the various legal issues with USCIS's increased scrutiny of SIJS petitions, advocates should not shy away from pushing back on requests for additional evidence or USCIS's raising questions about the child's "primary purpose" in initiating a state court action in cases where sufficient evidence was included in the initial petition. Various advocates have reported success arguing that the additional evidence requested by USCIS is not necessary to demonstrate eligibility for SIJS. Further, forcing USCIS to abide by the law, regulations, and policies that govern the adjudication of SIJS petitions will ensure access to this relief for future eligible applicants.[31]

[31] For assistance in responding to RFEs/NOIDS, sample responses, or other questions about this advisory, please contact Rachel Prandini at rprandini@ilrc.org.