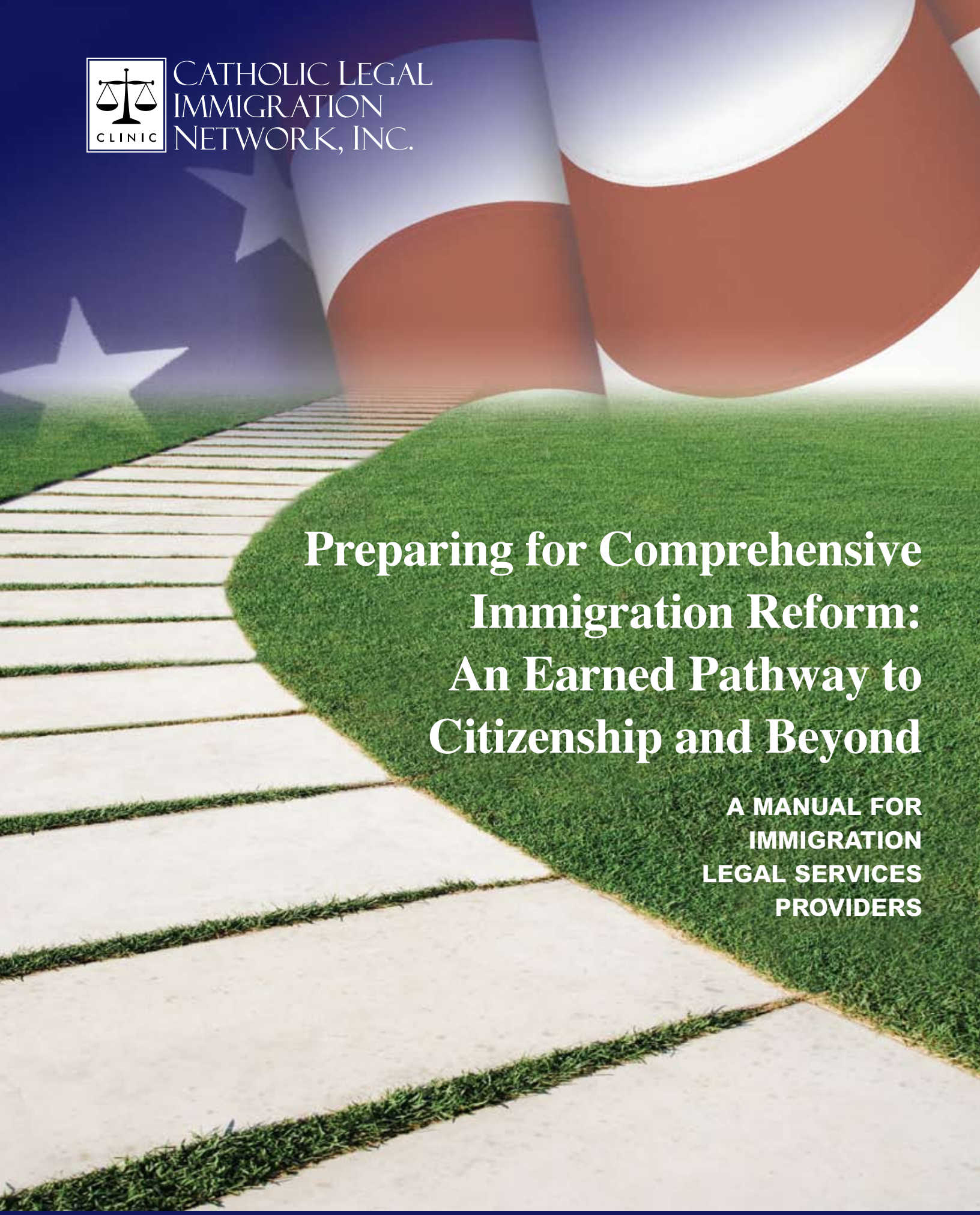

CATHOLIC LEGAL IMMIGRATION NETWORK, INC.

Preparing for Comprehensive Immigration Reform: An Earned Pathway to Citizenship and Beyond

A MANUAL FOR IMMIGRATION LEGAL SERVICES PROVIDERS

A COMPREHENSIVE IMMIGRATION REFORM MANUAL BY **CATHOLIC LEGAL IMMIGRATION NETWORK, INC.**

Preparing for Comprehensive Immigration Reform: An Earned Pathway to Citizenship and Beyond

A Manual for Immigration Legal Services Providers

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Table of Contents

INTRODUCTION 1

SUMMARY OF RECOMMENDATIONS 2

BACKGROUND 4

LEADING UP TO CIR 5

- I. MAKE A CONSCIOUS DECISION TO START PREPARING NOW 5
- II. MAKE SURE TO HAVE STRONG SYSTEMS IN PLACE NOW 6
- III. DETERMINE HOW YOU WILL USE VOLUNTEERS 10
- IV. ESTABLISH YOUR OFFICE AS *THE* SOURCE 11
- V. UNAUTHORIZED PRACTITIONERS—*NOTARIOS* 11
- VI. STRENGTHEN NETWORKS 12
- VII. APPLY NOW FOR BIA RECOGNITION FOR YOUR AGENCY AND ACCREDITATION FOR YOUR STAFF 14
- VIII. ADVOCATE FOR PRO-IMMIGRANT PROVISIONS IN CIR PROPOSALS 15
- IX. ASSESS YOUR OFFICE FOR PHYSICAL SPACE AND INFRASTRUCTURE 16

AFTER LEGISLATION PASSES 17

- I. APPOINT A CIR PROJECT DIRECTOR 17
- II. IDENTIFY FUNDERS AND REQUEST FUNDING 17
- III. PARTICIPATE IN REGULAR CALLS WITH CLINIC 17
- IV. TRAIN STAFF AND VOLUNTEERS ON THE NEW LAW 18
- V. CREATE ESSENTIAL FORMS 19
- VI. REVIEW FILES TO DETERMINE ELIGIBILITY 19
- VII. ADVOCATE TO DHS FOR A JUST IMPLEMENTATION 19
- VIII. ESTABLISH PROTOCOL FOR THE AGENCY'S CIR PROJECT 19
- IX. ESTABLISH FEES FOR SERVICES 21
- X. PROVIDE INFORMATION TO THE COMMUNITY 22
- XI. PROVIDE HIGH QUALITY, EFFICIENT, AND TIMELY LEGAL SERVICES 22

CONCLUSION 23

AFTERWORD 24

Introduction

An estimated 12 million undocumented people reside in the United States. When comprehensive immigration reform (CIR) passes, a large number of these people will seek assistance at non-profit legal service organizations. The Catholic Legal Immigration Network, Inc. (CLINIC) currently has more than 185 member organizations in 290 locations. CLINIC and other non-profit immigration service networks must be prepared to meet the huge increase in demand for their services.

This manual offers recommendations from "veterans" of the 1986 Immigration Reform and Control Act (IRCA). It was written to help charitable immigration agencies increase program capacity and prepare for a large-scale CIR program. Its recommendations are offered to spur thinking and planning by these agencies as a "one size fits all" approach cannot succeed since agencies' needs and circumstances vary. It is hoped that the manual will enable agencies to develop the policies and practices that are best suited to the circumstances of their programs and communities. The manual begins with a summary of recommendations. It then provides an extensive narrative that elaborates on these recommendations. Initially published in 2006, the manual has been revised and updated to reflect the challenges and opportunities facing charitable immigration programs today.

This manual is not intended to be used to create immigration legal service programs. For those interested in learning about how to start an immigration legal service program, please refer to CLINIC's *Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity*, a comprehensive management manual that may be downloaded from CLINIC's website at **www.cliniclegal.org**.

Summary of Recommendations

Before the law passes, what should you do to prepare for CIR?

- ❑ **Make a conscious decision to start preparing now.** Obtain the buy-in of agency leadership, identify a point of contact to promote the program at all agency levels, anticipate future challenges, reach out to local partners to create a steering or advisory committee, and research Census data and other sources to determine the undocumented population in your area.
- ❑ **Ensure that your organization has strong internal systems and that staff complies with them.** It will be easier to adapt strong systems to a new CIR project.
- ❑ **Determine how you will use volunteers.** Establish a volunteer coordinator position, recruit and train volunteers, and establish volunteer programs with key partners in your community.
- ❑ **Establish your office as *the* source for accurate and truthful information.** Develop trust with the community by providing accurate information on current issues of importance and education on meeting possible requirements in future law under CIR.
- ❑ **Conduct public education about unscrupulous immigration service providers.** Stress that notarios and immigration consultants may take advantage of the undocumented, distinguish between reputable immigration attorneys and those who have had no prior experience in immigration law, and provide information on how to file complaints against *notarios* and attorneys.
- ❑ **Identify and work with existing networks to reach out to diverse ethnic, socio-economic, and religious groups to provide information to the community.** Networks may include foreign consulates/embassies, media, religious organizations, and programs in the immigrant community.
- ❑ **Develop relationships now with pro bono immigration attorneys.** Refer complicated cases to reputable attorneys, establish a system to receive feedback on referral attorneys, identify attorneys with experience in areas of the law that your office is unfamiliar with, invite reputable attorneys to participate on your Board or Advisory Committee, and recruit attorneys and law firms to volunteer in community workshops and pro bono services.
- ❑ **Strengthen your relationship with the local USCIS district office.** Be a professional and zealous advocate in local liaison meetings, develop a reputation for filing well-prepared applications, and distinguish your agency as a leader in the community.
- ❑ **Become a member of CLINIC's network.** Report to CLINIC about practices or trends observed when dealing with the local DHS, receive information essential to effective representation, and receive training and resource materials on the new law.
- ❑ **If applicable, apply now for BIA recognition and accreditation to avoid engaging in the unauthorized practice of law.**
- ❑ **Lobby Congress about the new law's provisions.** Focus your efforts on funding, interpretation and implementation, specific provisions, the implementation period, and public education.
- ❑ **Assess your offices for physical space.** Your agency should have adequate space to provide services for increased clientele, store additional case files, conduct informational sessions and group processing workshops, and offer child care, English as a Second Language classes, and civics courses.

After the law passes, what should you do to implement a CIR project?

- ❑ **Appoint or hire a CIR Project Director/Coordinator.**
- ❑ **Identify funders and request funding.**
- ❑ **Participate in CLINIC's monthly calls on implementation issues.** Stay up-to-date on the issues, report to the national agencies on local practices and trends, and communicate and brainstorm with partner agencies.
- ❑ **Recruit and train staff and volunteers in the new law.**
- ❑ **Create essential forms.** Forms should include informational flyers, a hand-out list of documents to gather, forms for listing residences and employment, and intake sheets.
- ❑ **Review closed and pending case dockets to determine eligibility for benefits.**
- ❑ **Advocate to the national and local DHS to ensure positive and generous implementation of the law.** Work with CLINIC's Advocacy Section to provide input into the development of the regulations, promote the establishment of an inter-agency working group that will collaborate with community-based organizations in the interpretation and implementation of the law, and assign a point person to the working group.
- ❑ **Establish an office policy on whether your office will continue taking non-CIR cases in addition to CIR cases.** If you decide to take both types, you may need to offer separate projects with different intake days, and allot staff time accordingly.
- ❑ **Decide whether you will provide one-on-one or group processing CIR assistance, or a combination of both.** Take into account agency capacity and the immigration legal needs of your community.
- ❑ **Establish an office policy on whether and under what circumstances you will file Form G-28, Notice of Entry of Appearance of Attorney or Representative.**
- ❑ **Establish fees for the CIR services your agency will provide.** Remember that CIR applicants must pay DHS fees in addition those charged by your agency. Create fee caps on agency fees for families and a fee waiver process for needy applicants.
- ❑ **Provide informational events in your communities.** Hold frequent information sessions at set times and places as soon as the law passes, and make sure you have outreach materials ready for distribution.
- ❑ **Provide high quality, efficient, and timely services to prevent people from turning to unscrupulous or incompetent immigration consultants.** Establish systems to process a high volume of cases competently and quickly, and don't let speed compromise quality of service.

Background

In the United States today, there are more than 36 million foreign-born persons, 12 million of whom are estimated to be undocumented. These numbers highlight the need for comprehensive immigration reform. They also indicate that the nation's next CIR program will be the most ambitious immigration initiative in its history, putting millions on a path to U.S. citizenship. Such a program will require a full mobilization of pro-immigrant organizations.

At this point, there is significant work to be done to assure the passage of an appropriately broad bill and to prepare immigrant communities and local service providers for such a program. It is extremely important that the lessons learned from the Immigration Reform and Control Act of 1986 (IRCA) be analyzed, documented, and used to inform the creation of the nation's next CIR program. Given the likelihood of legislation, this effort could not be more timely or necessary.

> The nation's next CIR program will be the most ambitious immigration initiative in its history

Definitions

For purposes of this manual, *comprehensive immigration reform (CIR)* will serve as a synonym for *legalization*, a process by which foreign nationals who are living in the United States can apply to adjust their status to obtain lawful permanent residence. It might also allow foreign nationals who come to the United States as temporary workers to apply to become lawful permanent residents after a certain period of residence and employment in this country. Some proposals for CIR have suggested that it would commence with a registration process, followed by a period where the applicant earns full resident status by labor, payment of taxes, or demonstration of good moral character. We do not yet know what a proposed CIR program will require.

A *temporary worker* program would permit willing foreign nationals who are seeking employment to be placed with willing employers in the United States. Generally, the employers must seek to fill jobs that U.S. workers are not willing to take. The recommendations offered here would apply to both a temporary worker and a CIR program.

Leading Up To CIR

A major concern of charitable immigration projects is how to plan for a CIR program that may or may not come to pass, given the high volume of work that such programs already accommodate. There is no easy way to predict what will happen in the legislative process. However, the possibility of legislation to allow an estimated 12 million immigrants to qualify for legal status is strong. Early preparation by immigration programs is essential and will help these programs build capacity and visibility even if legislation does not pass in the short-term.

I. MAKE A CONSCIOUS DECISION TO START PREPARING NOW

The first step is to win support from the organization's key stakeholders and backers.

The most important step you can take is to make an informed decision to prepare for CIR *now*, while there is still time. To do this, you must anticipate the demands of any potential future legislation, assess agency-wide capacity, and make key decisions. The following action items will allow you to analyze your current organizational capacity and create a framework for developing a strong CIR project.

- ❑ **Buy-in.** Obtain buy-in from agency leadership. If leadership does not support your CIR project, it will go nowhere.
- ❑ **Mission Statement.** Develop a mission statement that enables your project to maintain focus on the services and community to be served.
- ❑ **CIR Coordinator.** To promote the project, you should choose a point of contact, or a CIR Coordinator. This person must have the authority to make decisions within your agency regarding CIR. S/he should also be able to advocate for the project to agency leadership and staff and to outside organizations, such as funders, coalition partners, and DHS. The CIR Coordinator should be responsible for communicating with CLINIC on a regular basis on issues including administrative advocacy, information sharing, and CIR training.
- ❑ **Case Management.** Evaluate your case management system and the time it takes staff to handle cases. This requires looking at statistics on case openings, filings, and closings. Although it is impossible at this time to determine the amount of time it will take to complete a CIR application, it might be comparable to the time it takes to complete an adjustment of status application. Evaluate current caseloads carried by staff members and determine how time could be made available to handle CIR.
- ❑ **Budgeting.** Review your agency's costs for operating an immigration legal service program and determine which will increase with a CIR project. Create draft budgets that cover anticipated revenues and expenses. Additional costs could include salaries for immigration counselors, mailing/postage, professional liability insurance for staff lawyers, volunteer stipends, and benefits like health insurance. There may be other costs for equipment, such as new computers, copiers, and scanning equipment. If CIR provides for electronic filing, you will need to plan accordingly.
- ❑ **Project Structure.** Draft a structure of a CIR project within your agency and present it to leadership for input. The discussion should include staff needs, the need for such a project, and the project's impact on the rest of your agency. Incorporate CIR into your agency's development plan for the upcoming year, including prioritization of funding for the project, amount of time required to prepare a project tailored to your agency, and the demand for legal services that will arise from a CIR program.
- ❑ **Foundation Funding.** Approach funders for grants to offset costs associated with outreach work and legal services capacity building, such as printing, recruiting and training volunteers, and obtaining BIA recognition and accreditation. Although there is no guarantee of funding, the closer we come to a CIR program becoming law, the better the chances of getting foundation funding.

Research is necessary. Review data to prepare for your community's needs.

- ❑ **Parent Institution Funding.** If your agency is affiliated with another institution, approach the leadership of the parent institution to fund a CIR project or to increase funding of an existing project. Consider creating a loan program for potential CIR applicants. It is important to recognize that many undocumented communities will turn to the Catholic Church to obtain assistance with CIR.

- ❑ **Institutional Experience.** To help prepare for changes in immigration law, use the institutional experience your agency gained when responding to previous changes in immigration law that resulted in an increase in demand for legal services, such as the sunset of Immigration and Nationality Act (INA) § 245(i) in April 2001, extensions of Temporary Protected Status (TPS), or the implementation of U visa projects within existing caseloads. Re-visit and evaluate your preparedness and response to those legal changes.

- ❑ **Partnerships.** Reach out to key partners in your area to collaborate on CIR work. For example, develop a coalition with ethnic apostolates, adult education or English as a Second Language (ESL) programs, priests' councils, and religious institutes. A coalition of agencies rather than one agency will be better able to address the needs of the undocumented community. The larger the coalition, the better the chances of reaching more undocumented immigrants.

- ❑ **Research.** Research U.S. Census data and other sources to determine the scope of the undocumented population in your area. Evaluate the current services your agency offers, and identify which communities you wish to serve and those you are currently serving (geographically as well as ethnically). Review your intake trends over the past year or two and compare these with demographic data on the undocumented in the service area. Determine whether certain communities are being overlooked. This will help you determine the potential demand for your immigration services.

II. MAKE SURE TO HAVE STRONG SYSTEMS IN PLACE NOW

Ensure that your immigration legal service organization has strong internal systems in place and that all staff complies with them. It will be easier to adapt strong systems to a new CIR project. Below is a checklist of issues to consider when evaluating and improving your internal case management system. For more detailed information about identifying management and fiscal practices that can enhance the viability and success of your immigration service program, please refer to CLINIC's Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity manual, which can be downloaded at **www.cliniclegal.org**.

- ❑ **Client Intake.** You should have a standard intake procedure that screens potential clients for basic eligibility for immigration benefits. If time and staffing allows, such intake can be done one-on-one with a legal counselor. However, many programs have found it beneficial to hold group information sessions for potential new clients. These sessions provide a brief overview of paths to permanent residence or documentation of status, and advise applicants of the type of cases that the program accepts. At the end of the session, individuals who want an appointment are scheduled with one of the counselors. A nominal fee is usually paid for the information session to defray costs. During all intakes, emphasize to clients the importance of notifying the government and your program about changes of address. At the end of the intake or informational session, provide a list of documents they will need to complete their applications.

- ❑ **Initial Consultations.** Experienced immigration practitioners should conduct initial consultations for purposes of identifying issues in your potential client's case. For a CIR project, this might not be possible and may have to be done by a recently-trained volunteer or new staff. In either case, there should be a consultation check-list that permits the intake interviewer to check-off all the eligibility requirements and possible bars to eligibility. It is extremely important to determine eligibility early on in the process and to identify any problems, rather than to discover them later in the case. This consultation checklist should be retained in the case file to document the consultation.

- ❑ **Declining Cases.** Consider having a standard "decline" letter to give to persons seeking to document their status through your agency. The letter should state that you cannot provide legal services to the person and that you do not represent the person. If space permits, the letter might briefly and clearly explain why you are declining the case. The letter also should include a warning against notarios and a referral list to other respectable legal service providers in your community if the person wants a second opinion.

- ❑ **Fees and Fee Waivers.** Do not start working on the case until the client has paid the fee and submitted all essential supporting documentation. This policy will save your agency time and keep the client more involved with the case. In general, persons who pay for their legal services are more responsive to the legal representative. Make sure that the client understands from the beginning that the success of the case relies not just on the legal service provider but also on the applicant. These recommendations are not intended to cut off indigent or low-income undocumented persons from legal services. Applicants who cannot afford to pay your agency fees should meet with a designated staff person to determine whether they qualify for a fee waiver or a sliding scale reduction in

fees. If they qualify for a sliding scale reduction in fees, consider working out an installment plan.

- **Retainer Agreements.** A retainer agreement should detail the responsibilities of both you and your client. The agreement should be explained to the client, and the client should have sufficient opportunity to examine it. It should be noted in the file that the retainer agreement was explained to the client, and whether the explanation was provided in English or translated into the client's native language. If the client does not understand English, the agreement should be explained in his/her native language. The agreement should be written in plain English, avoiding legal jargon when possible.

  The retainer agreement should specify the services being provided and at what point representation ends. It should set forth the fee, if any, and should identify which services are included for that fee. The retainer agreement also should state that you cannot guarantee the outcome of the application, and that it is the client's responsibility to keep you informed, within a certain time period, of any change in residential address, work address, mailing address, telephone number(s), and/or e-mail address. Likewise, the retainer agreement should explain that the client must assist with the preparation of the application and the development of the case by providing truthful information, responding to requests to submit documentation or providing an explanation as to why documents cannot be submitted in a timely manner, and arriving on time for all meetings with his/her representative and all government interviews/hearings.

  Finally, the retainer agreement should include a description of the complaint process in case the client wishes to submit a complaint against a staff person.

- **Case Selection.** Case selection requires an agency to set forth criteria by which to accept, turn down, and refer cases. For example, during a CIR program, you may decide to accept only cases that are clearly eligible, and to decline cases that require filing an application for a waiver, appeal, or possible work in immigration court. You also might decide to reject any cases that involve criminal convictions or that were prepared incorrectly by incompetent immigration practitioners. Your criteria for accepting or rejecting cases should be made clear to all staff, and case selection should be monitored to ensure compliance with agency policy. To ensure the case selection criteria are being followed, maintain case statistics by type of cases selected for representation, number of cases opened and closed, and number of clients by nationality and gender. Select a staff person to maintain these statistics and ensure that the agency is serving the community that it was created to serve. The designated person also should monitor your case load to track the case mix. A healthy case mix (e.g., some fee-generating cases and some grant supported cases) will help maintain your long-term viability. Your case selection criteria should provide for exceptions to the cases that are regularly declined. Compelling cases might include persons who cannot find assistance elsewhere, or who present humanitarian factors.

  You must be firm and consistent about turning away cases that fail to meet your case selection criteria. Accepting every case without proper evaluation could lead to the eventual collapse of your agency due to overextended resources. In addition, overburdened staff ultimately will harm clients by providing low- quality service. Train staff to decline cases in a respectful manner, taking into consideration the devastating impact this information may have. Staff must be clear and compassionate in explaining the reasons for ineligibility and for declining the case. If ineligibility is not explained, the person may simply move on to an unscrupulous immigration practitioner who will take his/her money and file an application.

- **Case Management.** A strong case management system establishes quality control and is essential to ensure that cases do not fall through the cracks. Your system must clearly detail the procedures for maintaining case files in order to ensure that all applications are reviewed before filing.

  - ***Uniform File Format***

    - You should establish a policy that sets forth how all case files will be organized. In well-established organizations, this might only require that you establish a way to differentiate the CIR files from the other immigration case files. For example, a color-coded file system or a separate filing cabinet could be used to separate the different types of cases.

    - Do not keep original documents like birth certificates, marriage certificates, passports, or other identity documents in files. Make copies of such documents

Did You Know?

CLINIC member agencies can access case management form checklists from their Field Support Coordinator to ensure that their forms are using best practices.

Did You Know?

Chapter 5 of CLINIC's *Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity* is dedicated to case management systems. Check it out for free on CLINIC's website.

for the file and return the originals to the client immediately. Maintain copies of all correspondence and applications filed with the government. The case notes should reflect that original documents were returned to client.

- If electronic filing is used, print out copies of the forms submitted to the Immigration Service, and keep the printed copy of the computer receipt in the file. Make sure that the client follows up with needed biometrics appointments or document filings. E-filing is currently an alternative filing method for a few immigration applications such as employment authorization and renewals of permanent residence cards. It may be proposed as a central method of filing for any CIR program. Keeping paper copies as a backup is essential for any program to ensure that computer-made transactions are not lost, and that client files are preserved for the future.

- Where possible, send government correspondence via secured, certified mail with return receipt to prove that the correspondence was received by the government. This will help the applicant prove that s/he filed a timely CIR application. In many cases, the return receipt is all you will have to prove that an application was filed with the government. It is essential that you train all staff members to match all certified mail return receipt cards with the case file, the corresponding white mailing slip, and the photocopy of the item mailed. Make sure that staff complies with this system even if pressed for time due to high caseload.

- ***Tickler System.*** It is important to have a method for keeping track of deadlines so that you do not forget to file applications or appear at interviews or hearings. If you miss an important date, such as a filing deadline or an interview with USCIS, then the application might be denied. The tickler system is just one way to ensure that a case does not fall through the cracks. If you use computer software for case management, a tickler system might be a safety net in case there is a software glitch. Most computer software or internet-based case management systems include tickler (or call-up) systems as part of the program.

- ***Case Notes.*** Case notes are essential. They allow you to understand the case, review the case history, and prepare for the work that still needs to be done. Case notes are particularly important when there is staff turnover. All notes written on the case should be dated and abbreviations should be easy to understand. If you are expecting many of the same type of applications, consider creating a key to explain all abbreviations early on so that all staff uses the same abbreviations for those applications (for example, CA: CIR application; CI: CIR interview; BC: birth certificate; MC: marriage certificate; or C: client.) Case notes should include the following information:

  - All attempts to contact the client or the government via telephone, U.S. mail, or email, regardless of whether the attempt was successful. Should it be necessary to defend yourself in the future against complaints by the client or government, or even a malpractice claim, these notes will be very helpful.

  - All appointments, and whether the client failed to show up or was late for appointment. If client was present at appointment, include notes on the nature of the appointment.

  - Failure by the client to fulfill the responsibilities listed in the retainer agreement should be reflected in the case notes, and possibly in a letter to the client. Should you later determine you need to cease legal representation, the case notes will help document the basis for terminating representation. If the application is denied by USCIS because of failure to submit required documentation or because USCIS determines that the applicant provided fraudulent information on the application, the case notes will help re-create the case history. Should the client file a complaint against you for malpractice, you will have a record of all actions you took on behalf of the client as well as all actions taken or not taken by the client.

❑ **Case Closing.** You should keep a photocopy of the government's grant or denial letter and a copy of the immigration document granted, such as the alien registration card (both sides). As soon as work is complete, you should have a case closing letter that clearly states: (i) you have completed the legal services you agreed to provide; (ii) you are ceasing legal representation of the client; and (iii) the person is no longer a client of your agency. This ensures that the former client understands that you no longer represent him/her. If no clear closing date of the case is conveyed to the client, you may retain legal liability for the case and client and, if a filing deadline or interview is subsequently missed, you might be held liable for legal malpractice. It is imperative that you clearly convey in writing to the client (and to the government in cases where you are the attorney of record) when you are terminating legal representation.

A definite date of closure also helps you determine how long you must keep the file in archives before shredding it. Most states require legal files be retained in archives for a certain number of years, and you should verify within your state how many years you are required to keep them before they can be destroyed. For example,

some states require that legal files be kept in archives for seven years from the date of closing the file before they are destroyed. You should establish a policy for archiving closed cases so that they do not take up active file space.

If you conduct group workshops and do not ultimately represent the CIR applicant, the closing letter can be incorporated into the retainer agreement. You may also provide a copy of the retainer agreement to the applicant at the beginning of the workshop and the original closing letter at the end of the workshop with the CIR application. You should then keep the original retainer agreement, copies of the application, and the closing letter for your archives.

- **Financial Controls.** Strong financial controls ensure that you are paid for your services and are not faced with the issue of misappropriation of money. During the CIR program of the 1980s, non-profit legal service providers experienced a huge increase in the number of people seeking immigration assistance and, consequently, a massive increase in fees generated. Some programs did not have solid financial controls in place to ensure accurate fee collection by the agency and credit to the proper client.

  A future CIR program will most likely result in the same huge inflow of clients and client fees. To prevent fraud, you must institute a strong financial control system. Depending on the size of your agency, only a few people should be permitted to accept fees. You should create or obtain a customized fee receipt that includes the agency's name, address, and telephone number so that your client will be able to identify easily which agency helped him/her. The client should be advised to keep the receipt as proof that he/she paid the fee for a specific legal service. The client should also save any money order receipts or cancelled checks that are paid to USCIS because they might be the only proof that the client filed a CIR application should USCIS lose the application.

  The actual legal service provider should never accept fees. Instead, a designated administrative person should be responsible for fee collection. It is preferable to require fee payments by check, credit, or debit card rather than cash. Many programs have already shifted away from cash acceptance, and have found that clients are able to accommodate as long as notice is given. The administrative person assigned to financial control should compare the legal services against the ledger for the intake of fees for each day. This is one way to ensure that fees paid by your client are in fact received.

- **Training Materials, Law Library, and Basic Office Equipment.** If you decide to establish a CIR project, you must have adequate library resources and equipment. Your staff should have easy access to copies of the Immigration and Nationality Act (INA), Title 8 of the Code of Federal Regulations (CFR), the legislation passed, and analyses of the law. Soon after the legislation is passed, CLINIC and other national legal support agencies will develop a manual and trainings on the CIR program. You must have access to secondary legal resources to permit research of legal issues that affect CIR applicants. This can be accomplished by purchasing the resources or by purchasing software that permits access to the resources, such as Westlaw and Lexis/Nexis.

  It will be vital that you have access to e-mail and the internet because information on practices and procedures before USCIS will be updated constantly. All staff should be familiar with the following websites: USCIS at **www.uscis.gov**, the Executive Office for Immigration Review (includes BIA decisions) at **www.usdoj.gov/eoir**, and the U.S. Department of State at **www.state.gov/visabulletin**.

  You will also need sufficient computers and printers to complete applications. Internet access will be essential for forms preparation, but also may be critical if electronic filing is encouraged for CIR. Scanners and copiers are also necessary equipment for a CIR program. Supporting documentation might be submitted by scanner and electronic filing if USCIS so instructs with CIR.

- **Multiple Site Programs.** Many non-profit immigration legal service programs have one main office with several branch or field offices that serve a large geographic area. This arrangement can be difficult for a program director to manage even without a CIR program. Once CIR passes, however, maintaining a cohesive agency with a unified response will be critical to providing effective services.

  To prepare, you should determine where services will be best delivered, if sub-offices will be used, and seek, if needed, BIA recognition for all sites where legal services will be delivered. You should determine whether

Did You Know?

Chapter 6 of CLINIC's *Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity* is dedicated to managing financial performance. Check it out for free on CLINIC's website.

Did You Know?

Chapter 2 of CLINIC's *Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity* is dedicated to tools. Check it out for free on CLINIC's website.

your agency can afford to network the computers of all offices to permit sharing of case information and documents on the central computer network. Web-based case management systems can be useful when serving clients from multiple offices. Additionally, regular staff meetings are important to maintain consistent office practices. Staff meetings in person may be impractical, and therefore communication should be maintained through regular web- and telephone-based meetings. Appoint a staff person to be responsible for providing regular e-mail communications and newsletters to all staff and volunteers to keep them up to date on any changes within the agency and any changes with respect to the interpretation and implementation of the new law.

Collect information about essential non-legal services in the area.

- ❑ **Referral Services.** Make sure your agency has a list of other projects in the community that provide non-legal services such as housing services, English as a Second Language classes, counseling, health care, and adult care. Give this list to all staff members and remind them to be aware of the non-immigration needs of persons seeking assistance at your agency. You want to ensure that your agency can link clients to the services that they most need.

  The most common type of referral needed at non-profit immigration legal service organizations is for private immigration attorneys or organizations that handle complicated immigration cases. You must make sure that the attorneys/organizations on your referral list are reputable and affordable. Include information about whether the referral organization or private attorney charges consultation fees. Keep track of entities and individuals within the community engaged in the unauthorized practice of law. With the consent of your executive director, consider sharing with other non-profit immigrant legal service organizations the names of entities or individuals engaged in the unauthorized practice of law. Warn immigrants in your community to avoid them. If necessary and appropriate, file complaints against such organizations or individuals.

- ❑ **Organizational Administrative Policies and Procedures Manual.** An administrative policies and procedures manual is necessary to guide staff. It also ensures that when there is staff turnover, new staff will have a resource to which they can turn to determine office policies. A written manual ensures uniformity in office policies and procedures and helps maintain consistency in their interpretation.

  The manual should be developed with the input of the executive director, board of directors, and staff. Because a CIR project most likely will operate for several years, the CIR project could develop its own administrative policies and procedures manual. If one already exists for your organization, it should not be difficult to adapt it to the needs of the CIR project.

III. DETERMINE HOW YOU WILL USE VOLUNTEERS

You should plan to use volunteers. During IRCA, most immigration programs relied heavily on volunteers to meet the increased demand for legal services. The next CIR program will have many more applicants than the previous program did, and immigration law today is more complicated today than it was 20 years ago. Your ability to increase the provision of legal services to the community will be limited without more staff and volunteers. One caveat: though IRCA veterans viewed volunteers as a valued asset, they warned that some volunteers obtained immigration law training that they later used to work with *notarios* to provide services. The following steps will help ensure that you develop a successful volunteer program.

- ❑ **Establish a Volunteer Coordinator Position.** This need not be a new staff person, and can be filled by existing staff. The volunteer coordinator should be responsible for recruiting, orienting, training, coordinating, and supervising volunteers. You should establish a minimal number of hours that volunteers are expected to work. Volunteers that provide legal services should be supervised by a BIA accredited representative or an attorney. Volunteers, like legal staff, should understand the importance of maintaining client confidentiality and sign a confidentiality agreement. The volunteer coordinator should serve as a liaison between volunteers and staff to ensure that there is a smooth and efficient working relationship. The coordinator should maintain a database to track volunteer hours worked, length of time with the agency, and cases worked on. This will be useful for program management and grant reporting purposes.

- ❑ **Recruit and Train Volunteers.** Before the law changes, recruit volunteers to assist with your current services and to help conduct public education outreach to the community about the current state of immigration law and pending legislation. Recruit students from local law schools, colleges, and universities. Set up an extern or intern program with a local law school or college. Advertise internships on the university website and particularly reach out to the foreign language, political science, and social work departments. Also remember to recruit volunteers from the religious communities in your area, and look for ways to reach retired professionals, who can sometimes offer full-time volunteer work.

  Establish a system to screen volunteers. Some programs

Understand what the volunteer expects to accomplish by working with your agency.

do background checks on volunteers. At a minimum, a staff person should interview the prospective volunteer and check the volunteer's references. Make sure that the volunteer is able to commit to the minimum number of hours needed by your program. To recruit trustworthy and supportive volunteers who are already informed about immigration or CIR issues, contact key partners in the community, such as ethnic apostolates, ESL programs, social service agencies, pastoral care providers, immigration coalitions, and partner agencies.

Volunteers should be fluent in the language of your target community or have a skill that helps your program operate. Because immigration law takes time to learn, it would be ideal to incorporate some volunteers into your program now. Volunteers who start now will be more likely to assume a leadership or supervisory role in a future CIR project.

- **Keep Volunteers Invested.** Thank volunteers for their help early and often. Volunteer training must include an orientation to the mission, structure, and services provided by your agency as a whole, not just the CIR project. Within the CIR project, volunteers must know to whom they should report and should be introduced to staff. Volunteers cannot be trained on the eligibility requirements for a CIR program before the law passes, but they can be trained on basic immigration law. It is also important to share information on pending immigration reform proposals with volunteers. This will help them understand what the immigrant advocacy community hopes to see in a new immigration law. Additionally, volunteers can be trained to identify specific documents immigrants are asked to gather and organize to establish their identity and CIR eligibility.

Volunteers should be asked for their input and suggestions. There should be regularly scheduled meetings with volunteers to brainstorm, discuss their work, meet other volunteers, and celebrate or consult each other about cases. Be sure to publicly recognize volunteers for their contributions, and to include them in the agency's mailing list to receive newsletters and other publications.

From the beginning, discuss the project's and volunteers' expectations for their involvement. After volunteers are trained, they can help staff conduct public education sessions on how to prepare for a future CIR program.

Did You Know?

CLINIC's website has free reports, presentation materials, and flyers to make your program an expert on CIR preparation.

IV. ESTABLISH YOUR OFFICE AS *THE* SOURCE

Conduct a public education campaign that provides accurate information about current immigration law and proposals pending before Congress. Disseminate information on a variety of issues pertinent to immigrants, such as drivers' licenses, healthcare, and taxes. Start *now*, before immigration reform passes. It is important that your agency build trust with the immigrant community. If you are perceived as *the* source in the community for truthful and accurate information, then the undocumented will more readily turn to you when immigration reform becomes law.

Although we do not yet know what the requirements will be for CIR, they may include: (a) continuous physical presence in the United States for a certain period of time; (b) employment in the United States; (c) identity (that the applicant is who s/he claims to be); and (d) good moral character. Moreover, CIR most likely will require the applicant to pay a fine in addition to any application fee. It is important to recommend that immigrants start saving now for potentially costly application fees and immigration-related expenses.

V. UNAUTHORIZED PRACTITIONERS—*NOTARIOS*

In some Latin American countries, a *notario* refers to someone who can provide legal services. In the United States, a notary public is not authorized to do so. Nevertheless, some people call themselves *notarios* to take advantage of unsuspecting immigrants, many of whom think that *notarios* can provide legal services.

Part of your education campaign should include identifying inaccurate information and disproving myths that are disseminated by unscrupulous immigration consultants and *notarios*. This will help prevent immigration consultants and incompetent practitioners from making false promises to the undocumented.

If possible, have persons damaged by unscrupulous immigration practitioners speak out publicly to the community. Develop a handout with the names and contact information of reputable and low-cost immigration legal service programs and private immigration attorneys. Warn the undocumented community when you are distributing this list that they should beware of any agency not

Did You Know?

Organizations such as the American Bar Association, American Immigration Lawyers Association, and U.S. Citizenship and Immigration Services have launched initiatives to eliminate "notario" practices. Visit their website and join efforts to protect immigrants from unauthorized practitioners of law.

named on the list. Advise persons to question the qualifications of any immigration practitioner with whom they consult. This includes questioning the extent of the agency's immigration law experience and whether the person is a licensed immigration attorney or otherwise authorized to provide immigration *legal* services.

Warn the public against fraudulent legal service providers which are sure to exploit CIR.

The office in your organization that handles inquiries from the undocumented should receive information on immigration reform from the same credible source, such as CLINIC, so all information distributed to the community is accurate and consistent. For those persons who choose not to avail themselves of your agency's legal representation, advise them through your public education presentations and materials to keep a record of their legal representative's full contact information, including name, address, telephone number, and business name. This is because *notarios* and other unscrupulous immigration consultants often disappear after they provide legal services to the undocumented. Advise the undocumented not to use the services of an organization or individual that cannot provide contact information. Tell them to get complete copies of everything the organization or individual files with USCIS on their behalf before leaving the office.

Warn people to be wary of any agency that requires payment in cash, or demands that checks or money orders be written out directly to an individual (or to "cash") rather than to the agency. This should raise concerns that the agency is not legitimate. Advise people to request a fee receipt for any services provided and to review the receipt immediately to make sure that it accurately reflects the amount paid and the services provided. The fee receipt should include the organization's full name, address, and telephone number and the date the service was provided. Immigrants should always keep cancelled checks and any money order records because that might be the only proof that they paid for the legal services.

If a *notario* or immigration consultant is offering a deal to get a "green card" that is too good to be true, then it probably is too good to be true. Your agency's public education presentations should include a warning that if a person has been advised that they are not qualified for an immigration benefit and a *notario* or immigration consultant says that they are eligible, they must ask the *notario* to explain why they are now eligible for the benefit. Remind them that they could risk being put into removal proceedings if they unquestioningly trust such practitioners.

Finally, a public education presentation should include local information on how immigrants can file complaints against immigration consultants and attorneys who are not competent or who cheat them out of their money. This will not only help victims, but may also help deter such practitioners from engaging in these practices in the future. In addition, it will create a public record of their activities for purposes of future prosecution. CLINIC is working with a coalition of national groups to report and encourage prosecution of unauthorized practitioners who victimize immigrants. Report notary abuses to CLINIC's Advocacy Section, whose contact information may be found at **www.cliniclegal.org**.

VI. STRENGTHEN NETWORKS

Before CIR passes, you should work to strengthen and expand your networks by building relationships with key local and national stakeholders. These networks will allow you to more effectively reach out to and serve the local immigrant community. Potential partners are listed below.

- ❑ **Local Networks and Organizations.** At the local level, you should first identify networks and organizations that serve the immigrant community, and then reach out to them to build a coalition. If you are a Catholic program, you will need to make it clear that you serve all people, regardless of their ethnic and religious backgrounds. The coalition can be comprised of consulates, religious organizations, social and legal service providers, business associations, ethnic organizations, and labor unions. A well-organized coalition will be able to disseminate information to a wide and diverse audience and will also be an effective immigrant rights advocate. Before the passage of CIR, this coalition can conduct public education to the undocumented community on how to prepare for a potential CIR program and to warn about *notarios*. After CIR passes, this coalition could be a valuable pool from which to recruit volunteers to assist in conducting informational sessions about the new law. An informal coalition might start out sharing information on advocacy efforts for CIR and evolve into sharing training responsibilities, preparing comments on regulations, and advocating for a fair and transparent implementation of the new law.

Did You Know?

The American Immigration Lawyers Assocation's website can help you identify immigration lawyers in your community. Visit **www.aila.org** and select "Find a Lawyer."

• ***Foreign Consulates/Embassies.*** Contact foreign consulates/embassies in the United States of the countries of the communities you serve to strategize how to conduct public education for your target communities. The consulates/embassies should

have credibility with your target audience.

- ***Do not limit your outreach to one ethnic group.*** Under IRCA, a disproportionate amount of advertising targeted the Hispanic community with little outreach to others. In a future CIR program, do not limit your outreach to one ethnic group even if it is the predominant beneficiary of your services. This will require a proactive presence in the international foreign language and local ethnic media, the primary media consumed by target communities. Public Service Announcements, guest columns, and interviews will inform the community about CIR requirements, eligibility, and protocol. They will also warn about the unauthorized practice of immigration law, which is likely to escalate during CIR.

- ***Media/Agency Services.*** Establish relationships with media that targets immigrant audiences, and provide information through existing agency services like ESL and adult education courses.

❑ **Pro Bono Immigration Attorneys.** Your CIR project will rely heavily on new staff and volunteers. This will mean a high volume of CIR applications being filed with USCIS. Although a strong case management system requires that all applications undergo quality control before being filed, you might not have enough experienced staff to review all the applications that your office must file. If this is the case, your agency may experience a bottleneck that delays filing. Any delay might cause clients to leave your agency and seek legal assistance elsewhere or go to a notary.

You should develop working relationships with immigration attorneys in your community in order to recruit them as volunteers for group processing workshops. Experienced immigration attorneys can provide quality control and oversight of applications. Identify quality immigration attorneys and law firms in your community and determine how they might be recruited for pro bono services.

One way to develop relationships with high-quality immigration attorneys is to create a referral list that includes several attorneys. Offer this list to people for whom you cannot provide legal services, such as in complicated cases involving criminal convictions or cases where the person has a final order of removal. Establish a system to receive feedback from the referred people as to how their cases were handled so as to monitor the quality of the legal representative's services and the reasonableness of the fee.

You also might invite reputable immigration attorneys to participate on your board of directors or on an advisory board for CIR. If you successfully recruit pro bono attorneys to help you with work now, they may continue to help you when a CIR program becomes law. If pro bono attorneys cannot volunteer on a regular basis, maintaining a connection may secure their help during CIR group processing workshops.

❑ **USCIS District Office.** Work to develop a good relationship with the local USCIS district office. Ensure that your office consistently files well-prepared application packets with USCIS, as the agency forms opinions on legal representatives and agencies based on the quality of the applications and petitions received. If you regularly file inadequate application packets, USCIS will view you as unprofessional. Sloppy applications demand more USCIS time and resources, and are more likely to be denied.

During IRCA, many agencies had strong relationships with local Immigration and Naturalization Service (INS) district offices. These agencies submitted well-prepared applications and were known in the community for providing competent services. At the time, interpretation of the law changed often and practices were in flux. Many agencies were able to advocate successfully to the local INS on behalf of their communities when there were legal gray areas because they had good reputations with the INS and received the benefit of the doubt. A future CIR program will bring similar debates about interpretation and implementation. Your agency should position itself to advocate effectively to USCIS.

You should be involved in local USCIS and community-based organization meetings. This will help you establish a rapport with the local USCIS district office in order to conduct administrative advocacy on CIR. It will also help distinguish your agency from the *notarios* that will be set up to make quick profits from CIR. It is advisable to represent your clients zealously and ethically. Stand up for their rights, but do so courteously and professionally so that you can reach common ground with DHS on CIR issues when the time comes. Advocates who disrespect others because they have a different point of view will not make much progress negotiating with DHS. Establish your agency as a respected player in the community and DHS will be far more willing to deal with you.

Get involved in current local USCIS and community-based organization (CBO) meetings

Did You Know?

USCIS' Community Relations Officers (CRO) are available for public education events and linking service providers to USCIS staff for improved customer services. CROs can be found on USCIS' website at **www.uscis.gov**.

Liaison meetings are also an important opportunity for your agency to learn local operating practices and procedures. Similarly, they are an opportunity to learn who the players are in the local office. Although there might be a completely different staffing structure by DHS under a future CIR program, knowing the current players and practices still might be relevant under changed law.

- **CLINIC's Network.** CLINIC affiliates (members and subscribers) receive regular updates on changes in the interpretation and implementation of the law. Often, affiliate agencies receive updates on changes in the law before the local DHS offices do. Affiliation to the CLINIC network will be especially important when the law changes, because information sharing and communication will be essential to effective representation.

  CLINIC's Advocacy Section liaises with DHS to promote fair interpretation and implementation of immigration law, with a special focus on upcoming CIR proposals. CLINIC affiliates report to CLINIC on practices and trends at their local DHS, and CLINIC then uses this information when advocating to DHS on behalf of its membership. DHS must often see a pattern of problems before it responds. The more member agencies report to CLINIC on local DHS practices, the better CLINIC will be able to advocate on a national level to DHS.

  To inquire about CLINIC affiliation, please email CLINIC at **national@cliniclegal.org**. For general information, visit CLINIC's website at **www.cliniclegal.org** and select "Affiliates." For those unable to become an affiliate member of CLINIC, it will still be helpful to visit CLINIC's website for educational materials on CIR.

VII. APPLY NOW FOR BIA RECOGNITION FOR YOUR AGENCY AND ACCREDITATION FOR YOUR STAFF

Federal regulations authorize people certified by the Board of Immigration Appeals (BIA) to represent immigrants before DHS and the Executive Office for Immigration Review (EOIR). Before CIR passes, make sure your office is authorized to represent immigrants before DHS and the EOIR, or else your agency will be engaged in the unauthorized practice of law.

Section 292 of the Immigration and Nationality Act and section 292 of Title 8 of the Code of Federal Regulations set forth who can legally provide representation for immigration purposes. The two main groups who can represent immigrants before DHS and the EOIR are licensed attorneys and BIA accredited representatives. Therefore, make sure that your agency has attorneys on staff and/or that your agency is recognized by the BIA as being a non-profit religious, charitable, social service, or similar organization that charges only *nominal* fees and that has at its disposal adequate knowledge, information, and experience of immigration law. An agency that is recognized by the BIA can obtain accreditation for its staff to represent immigrants before DHS and the EOIR.

A BIA recognized agency can officially represent immigrants before the DHS and the EOIR

Apply now for BIA recognition and accreditation because it takes many months for such applications to be decided. Concurrent approval of BIA recognition and accreditation is possible. Thus, your agency's recognition application and staff members' individual accreditation applications may be filed simultaneously. CLINIC member agencies should avail themselves of CLINIC's support for compiling and filing these applications. Attorney-led immigration legal service organizations do not need to apply for BIA recognition if the attorney(s) will be the person(s) responsible for providing legal services. Agencies with attorneys might nevertheless consider obtaining BIA recognition and accreditation to increase the number of staff qualified to provide legal representation to immigrants.

Because federal regulations dictate who can represent immigrants before DHS and the EOIR, so-called "immigration consultants" who are authorized by state law to provide certain services to immigrants are not authorized to represent immigrants before DHS or the EOIR. State laws regulate "immigration consultants," but cannot authorize the practice of immigration law before DHS and the immigration courts.

The "practice" of immigration representation before DHS and the BIA includes: advising immigrants about how to obtain immigration benefits; analyzing eligibility for those benefits; selecting the correct immigration form to complete; properly completing the form; and properly filing a petition or application. Immigration consultants who are not BIA accredited and who perform any of these services are, in fact, engaging in the unauthorized practice of law.

Whether you decide to have attorneys, BIA accredited

Did You Know?

CLINIC affiliates can receive technical support from their FSC when completing their BIA recognition and accreditation applications. Non-members can download a complete set of technical assistance materials from CLINIC's *Toolkit for BIA Recognition and Accreditation*. Check it out for free on our website.

representatives, or both, make sure that your agency carries adequate professional liability insurance and that it is included in the CIR project's budget.

Did You Know?

The Justice For Immigrants campaign's website has additional materials on advocating for CIR. Visit **www.justiceforimmigrants.org** and select "Take Action" to join the campaign.

VIII. ADVOCATE FOR PRO-IMMIGRANT PROVISIONS IN CIR PROPOSALS

Immigrant advocates must collaboratively push for the inclusion of pro-immigrant provisions in CIR proposals. Advocates must also analyze and monitor pending CIR proposals to ensure that anti-immigrant or restrictive provisions are not hidden in the text. In 1996, IIRIRA included provisions barring immigrant admission for certain immigration violations for three years, ten years, and, in some cases, permanently. These provisions turned out to be a nightmare for many people residing in the United States in unlawful status who later wanted to obtain lawful permanent residence.

The more clear and specific the pro-immigrant language of the new law, the less room DHS will have to interpret the law restrictively. The following is a non-exhaustive list of provisions that will allow for effective implementation of any CIR proposal:

- **Public Education.** CIR must provide funding for non-profit, community-based organizations to conduct public education for the undocumented community about eligibility requirements under the new law.
- **Filing Options.** If an electronic filing process is proposed for CIR applications, a paper alternative should also be permitted.
- **Documentation.** The law should state that it is the *intent* of *Congress* not to require an unreasonably burdensome amount of documentary proof from applicants since undocumented people often are not provided with documents like paycheck stubs, bank statements, or Social Security records.
- **Inadmissibility.** The proposal should exempt applicants from certain grounds of inadmissibility. For example, INA § 212(a)(6)(A) for being present in the United States without admission or parole should be inapplicable to people applying for CIR. Similarly, the bars for unlawful presence under INA 212(a)(9)(B) and (C), for prior removals under INA 212(a)(9)(A) and INA 212(a)(6)(B), and reinstatement of removal under INA 241(a)(5) should not apply to CIR applicants.
- **Confidentiality.** The proposal should include a strong confidentiality provision. Immigrants must feel confident that information provided in the applications will not be used against them or serve as a basis for deportation.
- **Waivers.** The proposal should allow broad humanitarian waivers for those inadmissibility grounds that do **apply.** The waivers should be possible without restriction of a certain qualifying relatives. Terrorism and persecutor grounds should not be allowed such waivers. Criminal grounds of inadmissibility would apply to CIR applicants, but existing waivers should be broadened to allow the possibility of filing for such a waiver even if an applicant lacks a qualifying U.S. citizen or LPR relative.
- **Prior Proceedings.** The proposal should include a measure allowing individuals to reopen prior immigration court proceedings if it is determined that they are now otherwise eligible for CIR.
- **Implementation Period.** The proposal must include a long implementation period. The government will need enough time to set up an infrastructure, prepare regulations, conduct outreach, and implement a CIR program. If there is a date of entry requirement for eligibility, it should be as close to the date of the law's enactment as possible.
- **English / U.S. Civics Exam.** The proposal should include an English/Civics requirement to promote immigrant integration. Those already proficient in English would need to pass an exam at the time of interview to demonstrate basic understanding of English and U.S. Civics.
- **ESL Courses.** Those applicants not already proficient in English should enroll in an approved course of study and demonstrate satisfactory completion to qualify. The government should provide funding for non-profits with experience in operating such courses.
- **Derivatives.** The proposal should allow the spouse and children of a principal applicant to qualify as derivatives. Date of filing the application should determine the age calculation for eligibility of children.
- **Safeguards.** The proposal should include due process safeguards, including an administrative appeal process and judicial review of the law.
- **Diversity.** The proposal should include a provision directing DHS to serve ethnically and geographically

diverse populations. Under IRCA, funding for advertising and outreach went primarily to the Hispanic community, while other ethnic groups were overlooked. Congress must ensure that all ethnic groups learn about and have an opportunity to benefit from the new law.

- ❑ **Employment Authorization.** Applicants should be rapidly provided with employment authorization.

IX. ASSESS YOUR OFFICE FOR PHYSICAL SPACE AND INFRASTRUCTURE

If legislation passes, an estimated 12 million immigrants may qualify for legal status. Your office will likely experience a large increase in potential clients, and you should be prepared to accommodate this jump. Prior to CIR, you should conduct an assessment of your space and infrastructure and determine if you need to make any changes. At a minimum, you should make sure to examine the following:

- ❑ **Office Space/Equipment.** Make sure you have enough: (1) space to serve increased clientele and to store new case files; (2) desks, chairs, and tables to interview potential clients; and (3) computers, printers, copiers, and scanners to process many applications at once. Budget for additional purchases if needed.

- ❑ **Telephone System.** You will likely receive a high volume of telephone calls, and should consider using a phone system that offers multiple prompts and messages in different languages, directing callers to basic and more specific information. This will save staff time in answering simple and repeated questions. You should decide if the phone system will offer callers access to staff phone extensions or not.

- ❑ **Information Sessions.** Identify free or low-cost space to conduct information sessions on eligibility requirements and application process under the new law. Incorporate rental fees for additional space into your project budget. Consider the availability of space and staff or volunteers to provide child care to those seeking services. Consider providing a safe, child-friendly area with toys and coloring books.

- ❑ **Hours of Operation.** Under IRCA, immigration legal service agencies extended hours and days of operations. Many were open late seven days a week during the application period. Assess whether your agency can afford to provide extended hours and days of operations, and consider security issues resulting from extended hours of operation in the evening or days when the building is normally closed.

- ❑ **ESL/Civics Classes.** CIR will likely include an English language and U.S. civics requirement. This might be required after the undocumented person documents his/her status but before the person obtains lawful permanent residence. Consider whether your office should provide ESL and U.S. civics classes to the community. This might require additional space and resources.

- ❑ **Group Processing Workshops.** Group processing workshops were common during IRCA, and will probably be necessary in a future program. You should assess agency capacity, examine what the law requires, and decide how best to operate the workshops. First, determine whether you have a space large enough to accommodate workshops. If you choose to hold them off-site, make sure your worker's compensation and liability insurance covers the new location. If your insurance charges more for this coverage, include it in the project budget. Second, assess your office equipment and, if needed, invest in more computers, printers, scanners, copy machines, and case management software. Make sure to include costs in the project budget. It will be important to make copies of completed applications and supporting documentation for your client and your files, so consider budgeting for one or two copiers that can handle large quantities of copies. We recommend having a second copier in case one breaks, and you will need scanners to send in supporting documents. You should also weigh the costs and benefits of using computers at the workshops. If DHS decides to process most applications online, you will need to have computers. If paper applications are accepted, it may still be possible to run group processing workshops without large numbers of computers; however, e-filing will still be preferable for speed and efficiency. Photographs and fingerprinting services are now provided by government-contracted Application Support Centers (ASCs), and will thus not likely be needed at your program. However, you should consider a way to provide fingerprint services for certain clients who need to run FBI checks to investigate prior contacts with law or immigration enforcement.

After Legislation Passes

The successful implementation of a CIR program will require a swift and well-thought out strategic response after the passage of legislation. Below are some recommendations that should be implemented as soon as CIR passes, taking into consideration the timeline established by Congress to implement the new legislation.

I. APPOINT A CIR PROJECT DIRECTOR

Your program will have a limited time period to file applications. Therefore, you must hit the ground running. The first thing to do is appoint or hire a CIR project director/coordinator.

In many cases, the CIR director can be the same person who coordinated your CIR preparedness activities. To assist in implementation, CLINIC will provide up-to-date information materials, technical support, and training information on our website. We highly recommend that CIR directors regularly visit the website for instructional manuals and updates on the new law and regulations. The Immigration Advocates Network (IAN), a network of non-profit legal services agencies, also provides resource materials. Non-profits may sign up for free at **www.immigrationadvocates.org** to gain access to these materials.

Did You Know?

CLINIC members may access a CIR preparation grant proposal to obtain local funding in the Members-Only section of our website.

II. IDENTIFY FUNDERS AND REQUEST FUNDING

Foundations and grant-makers will likely respond to CIR by funding legal and related services. Identify and approach all possible private foundations, individual donors, and government grantors. Your agency's leadership may also be willing to pursue individual donors to support CIR. Regardless, the executive director and immigration program director should pursue funding for the CIR project.

Cultivation of funders, primarily foundations, should begin *before* the law passes. Invite foundation officers to agency-sponsored events such as community public education talks on CIR, group processing workshops, etc. When targeting a private foundation or a government grant-maker, know their interests and priorities.

In the lead up to CIR, educate funders on the importance of a CIR program to raise awareness about your entire agency as well as the CIR project. Explain what a good CIR project can accomplish. Explain that the program can bring undocumented people out of the shadows to become full members of society, help the working poor, keep families together, provide education against notaries who take advantage of the undocumented, and further goals of democracy by training, educating, and including millions of people who are already settled here in our government process. Show funders demographic statistics on the undocumented in your area to illustrate the need for services, including a comparison of the number of people you currently serve with an expected increase in demand. Expand existing mailing lists to market the CIR project to a wider audience by obtaining names and contact information from your agency's leadership.

III. PARTICIPATE IN REGULAR CALLS WITH CLINIC

Soon after CIR passes, CLINIC will hold regularly scheduled conference calls to provide updates from the national headquarters of DHS on interpretation and implementation of the new law. In addition, CLINIC will provide written materials, trainings, manuals, and reports on the new law. It is imperative that you and your staff learn the new law as soon as possible after it passes to convey accurate information to the communities that you serve. The conference calls will allow your staff to stay informed on the latest immigration regulations and policies. They will also provide a vehicle for

your agency to report to CLINIC and other agencies on practices and trends in local DHS offices. CLINIC will use this information in its national administrative advocacy and in commenting on regulations. These conference calls will help local agencies brainstorm on how to respond to DHS practices around the country and to create proactive practices to serve immigrant communities.

Recruit volunteers and hire new staff as soon as CIR passes.

IV. TRAIN STAFF AND VOLUNTEERS ON THE NEW LAW

If you have not already done so, you should recruit volunteers and hire new staff as soon as CIR passes. During IRCA, religious and community leaders helped recruit volunteers. When the news breaks about a new CIR program, capitalize on media coverage and recruit volunteers from other institutions, such as schools, bar associations, communities of the religious, and community organizations.

Training should be done periodically as new volunteers join or new immigration regulations are issued. Previously trained volunteers can help train new volunteers. Hold weekly status meetings to get input from volunteers on practice trends, problems encountered, and how to handle difficult cases or clients. Approach the local chapter of the American Immigration Lawyers Association (AILA) to request help training staff and recruiting pro bono immigration attorneys to help your agency.

New staff and volunteers should receive an orientation to your agency, your mission, and the community you serves. Introduce new staff and volunteers to current agency personnel. Advise them on your policies and procedures and inform them about your culture. New staff and volunteers should feel welcome and should understand how they fit into the agency.

You must be clear and upfront about your expectations for volunteers. You must also try to understand what volunteers expect to get out of working with your agency. Beware of people who volunteer merely to gain experience so that they can provide immigration legal services on their own. Although there is no way to guarantee that this will not happen, your agency can reduce this possibility by recruiting volunteers through known groups. Also, institute a policy that staff can neither handle cases outside the agency nor work for *notarios* or immigration consultants.

Train your staff and volunteers to treat all clients with dignity and respect. Explain that your agency's mission is to welcome immigrants and assist them. Make sure that staff and volunteers understand that communication with clients and potential clients is confidential. Staff and volunteers should not gossip or joke about clients or potential clients. Discussion of cases should be limited to questions or comments about eligibility and procedures. Particularly in the case of group processing workshops, staff and volunteers should talk directly with the person seeking CIR assistance and not discuss specific cases in the open. Create a standardized form for volunteers to sign that sets forth your expectations for the volunteer, including the need to keep client information confidential.

- ❑ **Training Topics for New Volunteers.** If volunteers are new to immigration law, a training should cover:
  - ***Introductions and purpose of the training;***
  - ***An overview of how to immigrate to the U.S.;***
  - ***Common definitions of immigration-related terms;***
  - ***Bars to permanent residence;***
  - ***Eligibility requirements for CIR;***
  - ***Sources of law;***
  - ***Bars to CIR and waivers that are available;***
  - ***Red flags: groups at risk;***
  - ***A review of the CIR application process; and***
  - ***Operation of group processing.***
- ❑ **Training Topics for Experienced Staff and Volunteers.** Experienced immigration staff might not need too much training on the new law, although they will need to learn the eligibility requirements and application process. Initial training of volunteers should consist of one or two evening sessions of three hours each. Soon after the passage of the new law, your staff and volunteers must be trained in:
  - ***Orientation to interviewing of clients and office procedures;***
  - ***Basic immigration law;***
  - ***Eligibility requirements for benefits under the new law and hazards of applying for certain individuals;***
  - ***The CIR application filing process;***
  - ***Bars to eligibility, waivers, and exemptions; and***
  - ***Your internal case processing procedures, from careful case intake/screening quality control and archiving of submitted files.***

As soon as the new CIR application form is issued, determine how much time will be required to complete it and create a plan for processing applications in your office. While you will likely serve a high volume of clients, do not forfeit quality for efficiency and speed. A well-trained staff will make fewer mistakes and prepare better cases. Sloppiness does not save time, as you will have to devote time and

resources later to correct mistakes and deal with possible malpractice complaints.

After the law passes, CLINIC will develop materials, provide trainings on legal changes, and offer technical assistance through its toll-free hotline and field office attorneys. These services will be in addition to CLINIC's regular conference calls, emails, and web postings. All staff and volunteers should be familiar with the resources.

V. CREATE ESSENTIAL FORMS

Preparation is necessary to implement the program. All of your materials and forms should be prepared ahead of time, and in languages spoken by the immigrant communities in the area. In the first month after the law passes, you must finalize all your forms and materials. Essential forms include:

- ***Informational session flyers;***
- ***List of documents to gather;***
- ***Handout to list current/ past residences;***
- ***Handout to list current/ past employment;***
- ***Office intake forms;***
- ***Client services agreements;***
- ***Volunteer consent forms;***
- ***File organization outline; and***
- ***Closing letters.***

VI. REVIEW FILES TO DETERMINE ELIGIBILITY

Review all the files in your office, both closed and pending, to determine who might be eligible to apply for CIR under the new law. Send out eligibility letters to the last known address of potentially eligible clients. Depending on the size of the pending and closed case dockets, the office might need to be closed for some time in order to conduct the review.

VII. ADVOCATE TO DHS FOR A JUST IMPLEMENTATION

Immigrant advocates must ensure that DHS correctly interprets the intent of Congress in passing CIR. In particular, advocates must provide input on the development of the regulations and the creation of the CIR application, ensuring a streamlined application form that is not too burdensome to complete. Advocates must ensure that DHS's *interpretation* of the new law does not eviscerate it. You can work with CLINIC to provide input into the development of the regulations, which will form the *executive interpretation* of the new law and influence how it is implemented. The following is a non-exhaustive list of advocacy issues that, if incorporated, would ensure a positive and generous implementation of the law:

- ❑ **Application Requirements and Filing Options.** Advocate for a paper filing option and a short, clear application form. The longer the application form, the lengthier the application processing time will be. Since CIR's purpose is to bring undocumented people out from the shadows, the language in the application form should be simple and should stick to the basic eligibility requirements of the program. Requiring mandatory e-filing of all CIR applicants would defeat the purpose of the law because many undocumented immigrants do not have access to computers. If e-filing is proposed as a filing method, it should therefore allow for a paper alternative. Advocate against excessive documentation requirements for CIR and waiver applications, and a forgiving standard by which USCIS will review affidavits/declarations and waiver applications.

- ❑ **Inter-Agency Working Group.** Advocate that DHS establish an inter-agency working group, including USCIS, CBP, and ICE, to work with community-based organizations (CBOs) in the interpretation and implementation of the law. This might involve regularly scheduled liaison meetings between DHS and CBOs. DHS should designate a representative to run liaison meetings who has authority over all three bureaus (USCIS, ICE, and CBP) and can ensure that representatives of the three bureaus are in attendance. This will ensure that all three bureaus work together to interpret and implement the new law, and will prevent contradictions and inconsistencies within DHS.

- ❑ **FOIA Responses.** Advocate for quick responses to Freedom of Information Act (FOIA) requests so that applicants can obtain their immigration records. The government should create a special response track that would allow a speedy response to CIR applicants. Current waits for ordinary FOIAs can often exceed one year, too long a period to be useful during a limited-term application period.

Your agency must continue participating in local liaison meetings after the law passes to receive updates on changes in local interpretation and implementation of the law. Keep minutes of the local liaison meetings including who is in attendance from DHS and the CBOs. Ensure that DHS follows through on issues it says it will address. Use the local liaison meetings to report bad practices or trends observed in the local DHS office. At the same time, advocates should praise DHS when they identify positive or helpful DHS practices.

VIII. ESTABLISH PROTOCOL FOR THE AGENCY'S CIR PROJECT

When a CIR program passes, your agency must establish a protocol for the CIR project, including which cases you will

handle, how you will process applications, and whether and under what circumstances you will file Form G-28. We have detailed some of the factors to take into consideration below.

- **Regular Immigration and CIR Cases.** Establish a policy about handling cases beyond the scope of CIR, and whether you will focus exclusively on CIR or not. If you decide to focus only on CIR cases, create a list of reputable immigration lawyers and legal service providers for referrals of other types of cases. If your agency has an existing caseload that it will continue to handle, decide how to divide staff time and resources between CIR cases and other immigration cases. Different intake times might be provided for the different types of cases, such as one day for new CIR cases and a second for other immigration cases.

  During IRCA, many CBOs handled only CIR cases because they were newly created and faced a large volume of people seeking assistance to document their status. Currently, many of the programs that are already providing immigration legal services would be the ones situated to take on CIR cases. Be aware that, as a matter of legal ethics, your agency cannot just stop working on its current caseload. You must devote a certain portion of time to your current caseload, even if you decide to accept only new CIR cases during the application period.

- **One-on-One, Group Processing, or Both.** Determine whether your agency will continue to provide one-on-one legal services for CIR cases or rely exclusively on group processing workshops. During IRCA, many CBOs provided a combination of both services by offering group processing workshops during the evenings and weekends when it was easier for applicants to attend such workshops and providing individual services during the day for complicated cases that required further legal screening.

  Your office's ability to include group processing workshops depends on your agency's size, caseload, and ability to recruit and train volunteers. The fewer the staff and volunteers, the more limited your ability will be to provide group processing workshops. If a sufficient number of staff and volunteers are not adequately trained in CIR, it will limit the effectiveness of the group processing model.

- **Form G-28, Notice of Entry of Appearance as Attorney or Representative.** Establish an office policy on whether to file Form G-28, Notice of Entry of Appearance as Attorney or Representative. One option is to let the client file the application on his/her own. Form G-28 notifies DHS that the applicant or petitioner has a legal representative. Its filing permits the legal representative to communicate with DHS on behalf of the client about the case, and to receive copies of any notices or correspondence sent to the applicant or petitioner. In general, the government will not speak with anyone, except the applicant, about the applicant's case unless there is a Form G-28 on file. During IRCA, many CBOs helped undocumented immigrants apply for CIR through group processing workshops. Often the CBOs did not file Form G-28 with the applications. Legal assistance was limited to completing the CIR application and filing it with the INS.

  When establishing a policy on whether to file Forms G-28 with CIR applications, consider that case processing times can be quite lengthy and that, if filed, you will have long-term responsibility for the case. Whatever policy you establish, it must be conveyed clearly so that the client understands the limits of the services you provide. This also should be explained in the client services agreement.

  If Form G-28 will be filed with the CIR applications, decide the extent of the representation. In particular, decide whether it will be limited to the initial CIR application or will also include renewal work permits or visas. If representation will be provided until the client's adjustment of status to lawful permanent residence, consider where and how the file will be kept during those years. Consider charging an annual case maintenance fee to cover the cost of keeping a file open each year and of providing any updates on changes in immigration law or practice. Also, ensure the client understands that it is his/her responsibility to keep you informed of his/her contact information during that time period. Consider charging separate fees at each stage of the case, since it will be difficult to gauge the total costs from the first application filed to lawful permanent residency.

  Once the legal representative files the Form G-28, your agency will continue to receive notices on the case until there is a decision or until the legal representative files a written notice with the government to withdraw as legal representative. Even if the legal representative ceases to work at your agency, you will continue to receive notices on behalf of the applicant. As with all correspondence to the government, a request to withdraw representation

Did You Know?

CLINIC believes that the group application workshop model will be essential during CIR. The current naturalization workshop model will likely be restructured to meet the unique challenges facing those seeking to document their status. To prepare to plan and implement the new model, check out CLINIC's *Toolkit for Naturalization Workshops*, available for free on our website.

should be filed by certified mail return receipt requested. A common problem with DHS is that former legal representatives continue to receive notices in cases from which they have withdrawn. A certified mail return receipt card will help prove to DHS that you withdrew from the case. It will also help immigrants whose cases are closed for failure to respond to a notice that s/he never received because DHS wrongly mailed the notice to the address of the former legal representative.

Did You Know?

Chapter 7 of CLINIC's *Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity* is dedicated to messaging and marketing to different audiences. Download it out for free on CLINIC's website.

If the decision is made not to file Form G-28 with any CIR applications, make sure the client understands that he/she is fully responsible for the case, including for informing USCIS of address changes. Explain this directly to the applicant and in writing.

The CIR application will likely have a section that will require the person who helps the applicant complete the application certify that s/he helped prepare the application. For purposes of the group processing workshop, establish a policy concerning who will sign this "preparer's" part of the CIR application. This might be the volunteer who helps the applicant complete the application, the quality control staff who reviews the application before filing, or the person who ultimately submits a Form G-28. Make sure that all forms used are in their current edition, or they will not be accepted by DHS. The latest acceptable revision date of the forms can be verified at **www.uscis.gov**.

IX. ESTABLISH FEES FOR SERVICES

It is important to establish fees for the legal services your office provides, as fees will help keep the client involved in the case, will generate revenue to offset any losses due to delays in funding from other sources, and will ultimately help your agency continue to provide high quality services over a long period of time. You should decide whether to base fees on the cost of the services provided or on what other immigration legal service providers in the area charge. Unless your agency is fully funded by grants, you must recoup a certain portion of the cost of the services in application fees; otherwise, you will not be able to afford to continue providing legal services. You must also take into account the issues listed below.

- ❑ **Keep Your Mission In Mind.** CLINIC members are non-profit, charitable immigration service providers that serve indigent and low-income people. Create fee caps for families. Remember, in addition to legal services fees, immigrants will need to pay filing fees and other immigration related fees. The fee collection system must include a process for handling requests for a reduction/waiver of the fee, based on economic necessity or other compelling reasons. Ideally, the person in charge of the fee reduction and waiver requests should be different from the person who handles the legal service representation.

- ❑ **Federal Regulations for BIA Recognized Agencies.** If your agency is recognized by the BIA, it is required by federal regulation to charge only *nominal* fees. The term, *nominal* fees, is not well-defined. Therefore, BIA recognized agencies should be aware of what other recognized agencies are charging and set fees within reason so that they do not lose their BIA recognition.

- ❑ **Determine the Services Covered.** Establish an office policy on what services the agency fees will cover. In particular, decide whether there will be one set fee to complete, file, and represent the client through the adjudication of the CIR application, or whether different fees will cover the costs of different steps in the CIR process. For example, separate fees can be established for:

  - ***Screening and consultation on eligibility;***
  - ***Application preparation (including preparation of affidavits and declarations);***
  - ***Application preparation, filing, and representation through the decision;***
  - ***Preparing a waiver application for a ground of inadmissibility;***
  - ***Representing complicated cases that require more time, such as ones with criminal convictions;***
  - ***Representing the client in a CIR interview; and***
  - ***Preparing and representing the client in an appeal of a denial of the CIR application.***

- ❑ **Collect Fees Up-Front.** Clearly explain the fees to the client and collect them up-front before service is rendered. The fees also should be outlined in the retainer agreement. Do not provide legal services and then ask for payment.

- ❑ **Do Not Collect Cash.** Establish an office policy against accepting cash for services, as it could lead to misappropriation of funds. Ensure you not only establish financial controls, but also adhere to them.

- ❑ **Receipts and Record Keeping.** When the fee is paid, make sure the client receives a receipt for payment and that a legible copy is kept in the case file and in the accounting

log. Make sure the client understands how long the process will take and emphasize that your office makes no guarantees about the outcome of the application.

X. PROVIDE INFORMATION TO THE COMMUNITY

As soon as the law passes, conduct public information sessions on the eligibility requirements for immigration benefits under the new law. Hold the sessions in communities or parishes that have the greatest number of undocumented people. Hold information sessions on either evenings or the weekend, when potential applicants are better able to attend.

During the information sessions, advise the undocumented about basic eligibility requirements for the program and how to file their own applications without having to resort to *notarios* or immigration consultants. Consider incorporating a screening session into the information sessions whereby trained staff or volunteers screen people to determine if they justifiably apply to document their status under the new law. If the screeners determine that certain people are eligible to file an application, provide each eligible person with a flyer advertising a group processing workshop on another date, and a checklist of documents to gather and bring to the group processing workshop. This will expedite the group processing workshops.

XI. PROVIDE HIGH QUALITY, EFFICIENT, AND TIMELY LEGAL SERVICES

During IRCA, there were frequently long waits at charitable immigration programs as programs sought to provide thorough services to clients. Because they grew tired of waiting and wanted their permanent residence as soon as possible, many people went to unscrupulous immigration consultants and *notarios*. Thus, it is critical that programs focus not only on providing quality immigration services, but also on efficiency and handling a high volume of applications.

Disseminate handouts that explain the process so that clients come to your office prepared to complete applications. Develop an efficient screening process. Case screening is a key part of the entire process because it determines a person's eligibility to apply to document his/her status and whether to commit agency resources to the case. Refine all of the processes to provide accurate screening of clients, strong case management, and meticulous, thorough quality control. Strong systems will result in better services.

Conclusion

This manual is intended to be a starting point for discussion on preparing an immigration legal service program for a future CIR program. It is not the final word on how to set up a CIR project within an existing agency, nor does it offer complete guidance for starting an immigration program. Instead, it seeks to start a dialogue among the leadership and the frontline staff of the agency on preparation for what will be a consuming challenge. Directors who involve frontline staff, volunteers, and partner agencies in creating an effective CIR project will be the most successful.

The more time devoted to preparing for a future CIR project, the better situated an agency will be to respond in a competent and efficient manner when the law changes.

Afterword

> "Hospitality… means primarily the creation of free space where the stranger can enter and become a friend instead of an enemy. Hospitality is not to change people but to offer them space where change can take place. It is not to bring men and women over to our side, but to offer freedom not disturbed by dividing lines. It is not to lead our neighbor into a corner where there are no alternatives left, but to open a wide spectrum of options for choice and commitment… to convert hostility into hospitality requires the creation of the friendly empty space where we can reach out to our fellow human beings and invite them to a new relationship."

—Henri J. M. Nouwen

The United States finds itself at a critical moment in its rich immigrant history. Thirty-three million foreign-born people reside within America's borders, striving to achieve their own part of the American dream. Immigrants worship in the country's churches, make economic contributions to its markets, send children to its schools, and bring new traditions and languages to its streets. Due to demand for their labor and their desire to reunite with family members, immigrants can be found from Portland, Maine to Portland, Oregon.
The United States' demographic shift is evident whenever one watches television, shops in a grocery store, or calls a phone service with multiple language options. The nation's increasing diversity affects the daily life of all U.S. residents, and no one is untouched by the associated opportunities and challenges.

A manual devoted to preparing for comprehensive immigration reform would thus be incomplete without commenting on the great need for a coordinated plan to integrate immigrant and receiving communities across the United States. Faith-based and immigrant-focused organizations have made great strides in recent years on key issues that affect immigrants, including resettlement of vulnerable refugee populations, remedies for victims of domestic violence and human trafficking, and increased rates of citizenship. However, integration—while typically viewed as an important goal—lacks a similarly coordinated and focused approach. An integrated community offers its residents immense benefits, including equality, security, a sense of belonging, and access to resources. All of these benefits protect community members against the many threats that frequently plague immigrants. The time has come for integration to be taken as seriously and with as much purpose as other issues confronting the immigrant population.

In the absence of a federally-led immigrant integration policy, large-scale institutions (such as the Catholic Church) must strategically and purposefully pursue immigrant integration. In the months following the passage of the 1986 Immigration Reform and Control Act (IRCA), organizations that worked with immigrants to help them legalize their status did not maximize integration opportunities, and thus lost the chance to engage hundreds of thousands of people in long-term integration efforts. Today, with the immigrant population continuing to grow, efforts to engage local immigrant communities and create space for integration to take place are needed more than ever.

The hard work of creating an integrated community happens at the local level. It is the local ministers, social workers, immigrants, teachers, and other residents who work together to create a space where integration can happen. Integration is inherently a localized effort; therefore, a blanket strategy for all communities cannot be prescribed. However several common principles can still be drawn. Integration:

- ***Is a complex social process.***
- ***Requires time and should be viewed as a process that spans more than one generation.***
- ***Is a multi-directional process requiring the participation and buy-in of various community groups.***

- ***Takes place at the local level. A community's efforts must be designed with local characteristics in mind.***
- ***Should focus on what community members bring to the community, not what they lack.***

Integration programs will not succeed if the goal is to "fix" people. Rather, initiatives should strive to create a community in which all members' assets are nourished and used to create a more cohesive society. By developing programs that reflect their unique needs and assets, diverse communities can create strikingly similar outcomes. Positive outcomes will include:

- ***Social cohesiveness.*** This can be achieved through an effort to understand the inspiring nexus between American values and norms and immigrant aspirations for their lives in an adopted homeland.
- ***Social justice.*** This can be achieved by working to promote justice and fair treatment for immigrants and other vulnerable populations in the community.
- ***Strengthened families.*** This can be achieved by offering immigrants various social services, including education, health advocacy, federal benefits, and increased access to quality child care.
- ***Civic participation, family unity, and equality.*** This can be achieved by promoting civic engagement, family reunification through immigration, and legal means to represent immigrants in their defense.

Integration remains a key challenge for communities across the nation. Regardless of the success of a comprehensive immigration reform package at the federal level, the need for integration initiatives must be addressed now. The United States' current demography and the future flow of immigrants demand that churches, community-based organizations, faith-based institutions, the government, and the private sector join together in an effort to create local communities in which all residents feel safe, respected, and involved. Integration efforts must be developed in a purposeful way with a long-term commitment to their success and sustainability. Only in this way will the United States begin to truly reflect the great potential, diversity, strengths, and capabilities of its residents.

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