



NATIONAL OFFICE

Submitted via email to: USCISPolicyManual@uscis.dhs.gov

May 7, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of the Director
20 Massachusetts Avenue, N.W.
Washington, D.C. 20529

RE: Policy Guidance Revisions: Volume 7, Part P, Chapter 5, Liberian Refugee Immigration Fairness

Dear Sir or Madam:

The Catholic Legal Immigration Network, Inc. (CLINIC) respectfully submits the following comments related to proposed changes to USCIS policy and procedures found in the USCIS Policy Manual at Volume 7, Part P, Chapter 5, Liberian Refugee Immigration Fairness. These comments are based on the expertise of CLINIC's staff, who have extensive experience representing clients, as well as insights from our affiliates and partners who regularly provide services to Liberian nationals and their families.

Embracing the Gospel value of welcoming the stranger, CLINIC promotes the dignity and protects the rights of immigrants in partnership with a dedicated network of immigration legal services programs. This network includes approximately 370 programs operating in 49 states and the District of Columbia. CLINIC's network employs an estimated 2,300 staff, including attorneys and accredited representatives who, in turn, serve hundreds of thousands of low-income immigrants each year.

CLINIC's attorneys conduct training and provide technical support on all of the immigration-related legal problems faced by low-income immigrants. In 2019, CLINIC attorneys trained over 12,700 people online and in-person. Our affiliates regularly assist clients with humanitarian and family-based applications for adjustment of status and dozens of agencies within our network are actively engaged in outreach and providing legal services to Liberian nationals and their families. Thus, CLINIC and its network have a vested interest in the successful implementation of the Liberian Refugee Immigration Fairness law.

As a Catholic organization, we are called to welcome the stranger and to serve our neighbors who seek safety in the United States. Congress passed the Liberian Refugee Immigration Fairness provision to provide long-term protection to our Liberian neighbors and their families. This is accordance with Catholic teachings, which recognize that all people have the right to seek safety and to care for their families. The Bible commands us: "You shall treat the [stranger] who resides with you no differently than the natives born among you; have the same love for him as for yourself; for you too were once

[strangers] in the land of Egypt.”¹ The published changes to the Policy Manual would impede Congressional intent and diverge from the first principle of Catholic social teaching on immigration, which states that people have the right to migrate to sustain their lives and the lives of their families.² Therefore, we offer the following comments on USCIS’s proposed changes to its policy and procedures.

I. Liberian Refugee Immigration Fairness Background and Intent

Liberia has been continuously designated for either Temporary Protected Status (TPS) or Deferred Enforced Departure (DED) since 1991, due to unsafe country conditions preventing Liberians from safely returning. In 2007, President Bush directed that DED be granted to Liberian TPS holders who were losing that form of temporary protection, allowing them to remain in the United States for 18 months. Since then, DED for Liberia has been extended by all subsequent administrations until the Trump administration terminated DED for Liberia in 2019. The wind-down period associated with this termination decision has since been extended and will now end on January 10, 2021.³

While eligible Liberians were protected from deportation under TPS or DED for decades, they have not had a pathway to adjust or change their status to become lawful permanent residents (LPRs) until recently. The 116th Congress incorporated the Liberian Refugee Immigration Fairness (LRIF) provision into the FY2020 National Defense Authorization Act (NDAA). The law allows Liberians who have been continuously present in the United States since November 2014 and certain close family members to apply for lawful permanent residency. President Trump signed the NDAA into law on December 20, 2019 (P.L. 116-92, Section 7611).⁴ The LRIF provision of the NDAA was based on S. 456, the Liberian Refugee Immigration Fairness Act, which Senator Reed introduced in the U.S. Senate. Congressman David Cicilline (D-RI) introduced companion legislation (H.R.1169) in the U.S. House of Representatives.

In a statement of December 12, 2019, Senator Reed commented on the LRIF provision: “These individuals came to America seeking safety from devastating wars and disaster. They’ve made a home here, built their lives, and strengthened our communities. America is their home and they shouldn’t be evicted. Forcing them back to Liberia now would create real hardships both here and in Liberia. By extending their legal status, we are providing much needed certainty and a measure of security for individuals while helping foster Liberia’s post-war recovery.”⁵

¹ Leviticus 19:33-34.

² Catholic Social Teaching on Immigration and the Movement of Peoples, U.S. CONFERENCE OF CATHOLIC BISHOPS www.usccb.org/issues-and-action/human-life-and-dignity/immigration/catholic-teaching-on-immigration-and-the-movement-of-peoples.cfm.

³ Memorandum on Extending the Wind-Down Period for Deferred Enforced Departure for Liberians 2020, DAILY COMP PRES. DOC. 212 (Mar. 30, 2020) www.govinfo.gov/content/pkg/DCPD-202000212/pdf/DCPD-202000212.pdf.

⁴ JILL H. WILSON, CONG. RESEARCH SERV., RS20844, TEMPORARY PROTECTED STATUS: OVERVIEW AND CURRENT ISSUES 9-10 (2020) <https://fas.org/sgp/crs/homesecc/RS20844.pdf>.

⁵ Press Release, Jack Reed, U.S. Sen. For R.I., Reed Includes NDAA Provision to Extend Permanent Residency Status for Eligible Liberians and Open a Pathway to U.S. Citizenship (Dec. 12, 2019), www.reed.senate.gov/news/releases/reed-includes-ndaa-provision-to-extend-permanent-residency-status-for-eligible-liberians-and-open-a-pathway-to-us-citizenship [hereinafter Press Release, Sen. Reed].

The intent of the legislation is to provide certainty and security for the Liberian community. Any implementation practices not enumerated in the statute that would cause uncertainty for applicants or serve as an impediment to their successful applications are inconsistent with the legislative intent of the LRIF provision.

II. General Comments

We appreciate this opportunity to provide feedback on this important new chapter of the USCIS Policy Manual. Due to challenges we face in the midst of this COVID-19 pandemic, CLINIC has selected to focus on three priority issues: narrowing of qualifications, over-burdensome evidentiary requirements, and lack of clarity on work authorizations. Considering the importance of this new eligibility category and the timing of the release of this guidance during the COVID-19 pandemic, a 30-day period to review and comment on this implementation guidance is insufficient for many stakeholders who wish to comprehensively and meaningfully provide feedback. Omission from our comments of issues outside of these top priorities should not be interpreted as tacit approval of those provisions.

Shortly after LRIF was signed into law by President Trump, CLINIC requested information regarding implementation and urged USCIS to engage stakeholders. Stakeholder engagement prior to and following USCIS policy updates, particularly regarding a new law with a limited period of availability, is a crucial aspect of an efficiently functioning adjudicatory agency. When policies are developed and carried out without any input from stakeholders, the agency loses the opportunity to discover ways in which the policy may be inefficient, counterproductive, or would cause unintended consequences. In addition, stakeholders lose the opportunity to ask questions and understand the policy before it goes into effect. In the future, CLINIC recommends that USCIS utilize robust stakeholder engagement both before and after a Policy Manual additions and changes.

Given the particular vulnerability of the affected population and short timetable for application submission, CLINIC urges USCIS to conduct extensive outreach and engagement with the potential beneficiaries of LRIF. We recommend that USCIS mail physical letters to current Liberian DED holders and former Liberian TPS holders containing information regarding LRIF. We also encourage USCIS to hold stakeholder meetings and regularly engage with legal services experts and advocates to solicit feedback and recommendations for LRIF's implementation. With respect to the timetable for application submission, we strongly urge USCIS to correct the language in the Policy Manual regarding timely filings⁶, as it differs from normal filing practices and procedures that consider applications filed as of the postmark date (in other words, USCIS should assess whether a LRIF application is "properly filed" based on a postmark date of December 20, 2020 or earlier, rather than a USCIS Lockbox receipt date).

The release of timely and accurate data regarding application rates and processing is critically important for USCIS, and community partners who serve potential applicants, to track application rates and target outreach. As such, we have already requested and continue to urge USCIS to commit to releasing regular monthly data regarding LRIF application approvals, denials, and pending applications through its online *Immigration and Citizenship Data* tool. The data set should track or mirror similar data reports released by USCIS regarding adjustment of status applications. The data set should separate information on Forms I-485 by Liberian applicants and their qualifying family members, and include information regarding associated filings such as fee waiver requests, Forms I-765 and I-131.

⁶ USCIS-PM P.5 at FN 17

III. Specific Concerns About USCIS' Policy Manual Volume 7, Part P, Chapter 5

Below, we will address CLINIC's concerns with the new chapter of the Policy Manual.

a. Qualification Narrowing

Section 7611 of the NDAA provides that the Department of Homeland Security “**shall** adjust the status of an alien described in subsection (c) to that of an alien lawfully admitted for permanent residence” (emphasis added).⁷ USCIS acknowledges the mandatory nature of LRIF adjustment by confirming that adjudicators “**must** approve the adjustment application if the applicant meets all the eligibility requirements. Adjustment under LRIF is **not discretionary**” (emphasis added).⁸ However, the guidance in Chapter 5 unnecessarily and unjustly narrows the number of beneficiaries who will be able to benefit from LRIF in two major ways.

i. USCIS ignores the clear language of the statute permitting qualifying family members to adjust status independently of the Liberian applicant

In Section C.4 of Chapter 5, USCIS takes the erroneous position it cannot approve the adjustment application of a qualifying spouse or child until and unless the Liberian applicant's⁹ adjustment application is approved:

*An eligible family member may not adjust status before the qualifying Liberian principal applicant. Adjustment of family members must be concurrent with or subsequent to the Liberian principal applicant's adjustment to LPR status.*¹⁰

This interpretation contradicts the clear language of the statute and unnecessarily narrows LRIF eligibility when the both the plain statutory language and legislative intent¹¹ mandate a generous and expansive application of the eligibility criteria. USCIS asserts, “the most reasonable interpretation is that the application filed by the Liberian national alien must meet all of the requirements of Section 7611(b) in its entirety,” including that the adjustment application submitted by the Liberian national be approvable.¹² In actuality, for a qualifying family member to be eligible to adjust, Section 7611(c)(1)(B) requires only that the family member be “the spouse, child, or unmarried son or daughter of an alien described in subparagraph (A).” And subparagraph (A) references only that the applicant be (i) a Liberian national and (ii) continuously present in the United States since November 20, 2014 through the date the adjustment application is submitted.¹³ Subparagraph (A) does **not** require the Liberian

⁷ National Defense Authorization Act for Fiscal Year 2020, Section 7611(b)(1), Pub. L. No. 116-92 (2019), available at www.congress.gov/116/bills/s/1790/BILLS-116s1790enr.pdf [hereinafter NDAA].

⁸ USCIS Policy Manual, vol. 7, pt. P, ch. 5, § C, available at www.uscis.gov/policy-manual/volume-7-part-p-chapter-5.

⁹ The USCIS Policy Manual uses the term “principal” to refer to the Liberian applicant through whom family members gain eligibility for LRIF adjustment. In this comment we use the term “applicant” in place of “principal,” because “principal” would indicate that family members are not principals themselves. Based on the statutory language, Liberian applicants and their qualifying family members are each independent principal applicants. Unless otherwise specified, in this comment, “applicant” refers to a Liberian applicant and not to family members.

¹⁰ USCIS Policy Manual, *supra* note 5, at vol. 7, pt. P, ch. 5, § C.4.

¹¹ Press Release, Sen. Reed, *supra* note 3.

¹² USCIS Policy Manual, *supra* note 5, vol. 7, pt. P, ch. 5, § C.4 at footnote 15.

¹³ NDAA *supra* note 4, Section 7611(c)(1)(a)(A).

applicant to also meet the admissibility requirements¹⁴ for adjustment or prove that she is not disqualified from eligibility based on certain convictions or persecution of others¹⁵ in order for a qualifying family member to be eligible adjust status.

***Example:** Liberian national Paul has remained in the United States since entering as a tourist in 1999 and is protected under DED. He is married to French citizen Agnes who entered in 2016. Paul and Agnes both submit timely LRIF adjustment applications. USCIS denies Paul's adjustment on the basis of a determination that he is inadmissible under INA § 212(a)(2) for a criminal conviction. Under the statute, Agnes' adjustment application should still be approved as long as she can show she has a qualifying spousal relationship to Paul who meets the Liberian nationality and continuous presence requirements.*

Because the statute does not give USCIS discretion to exclude eligible applicants, we respectfully request that USCIS revise Section C.4 to permit an otherwise eligible family member to adjust status independently of the Liberian applicant. Making family members' ability to adjust status contingent on the Liberian's adjustment contradicts the NDAA.

ii. USCIS should recognize exceptions to the continuous physical presence requirement when an aggregate absence of more than 180 days resulted from circumstances beyond the applicant's control.

Since the humanitarian purpose of LRIF is to provide a path to LPR status and citizenship for former Liberian TPS recipients who have been long-time contributing members of our society, USCIS should revise Section C.2 of Chapter 5 to interpret the continuous presence requirement more expansively. Section 7611(c)(2) of the statute states that a Liberian applicant “**shall not** be considered to have failed to maintain continuous physical presence based on one or more absences from the United States for one or more periods amounting, in the aggregate, of not more than 180 days” (emphasis added). This framing focusing on prohibiting the agency from disqualifying applicants rather than more permissive language¹⁶ suggests a generous application of the continuous presence requirement and does not foreclose USCIS from recognizing situations where an otherwise eligible Liberian applicant might have been outside the United States for more than 180 days cumulatively since November 20, 2014. Specifically, USCIS should recognize exceptions for applicants with absences that exceed 180 days based on emergent or extenuating circumstances necessitating travel.

USCIS should review how it analyzes continuous physical presence in the context of assessing eligibility for other humanitarian immigration benefits with a similar requirement, such as TPS, adjustment of status under the Haitian Immigration Fairness Act (HRIFA), and adjustment of U nonimmigrants under INA § 245(m). In the TPS context, a brief, casual or innocent absence does not break continuous physical presence nor does a brief, temporary trip abroad due merely to emergency or

¹⁴ NDAA *supra* note 4, Section 7611(b)(2).

¹⁵ NDAA *supra* note 4, Section 7611(b)(3).

¹⁶ Congress chose to use the phrase “an alien **shall not be considered** to have failed to maintain continuous physical presence...” (emphasis added) in the NDAA. In contrast, in INA § 245(m)(2), which sets forth the analogous continuous physical presence requirement for adjustment to LPR status of U nonimmigrants, Congress used the language: “An alien **shall be considered** to have failed to maintain continuous physical presences...” (emphasis added).”

extenuating circumstances outside the control of the alien.¹⁷ Otherwise LRIF-eligible individuals should not be prevented from adjusting status because they had to travel overseas for a family emergency – to attend funeral services or visit an ailing relative – and were unable to return prior to accumulating an aggregate of more than 180 days outside the country since November 20, 2014, particularly when such a trip originated prior to the enactment of the NDAA.

A TPS beneficiary who leaves and reenters the United States during the validity period of an advance parole document does not break the continuous physical presence requirement for maintaining TPS. Liberians recognized under DED are also permitted to seek advance parole¹⁸ and most advance parole documents (Form I-512) are valid for one year. Therefore, there may be otherwise LRIF-eligible Liberians who legally departed the United States for more than 180 days and were lawfully readmitted to continue to benefit from DED protection. Such individuals should not be punished for a lawful trip abroad undertaken for a humanitarian, educational or employment purpose at a time when LRIF was not yet in existence.

Instead of unnecessarily and unjustly narrowing the number of people who will be able to benefit from LRIF, USCIS should adopt a more inclusive standard for assessing continuous physical presence.

b. Burdensome and Overbroad Evidentiary Requirements

The intended beneficiaries of LRIF are Liberians who fled civil war and Ebola and have lived legally in the United States for years under TPS and then DED, paid taxes, and made positive contributions to their communities. Given the incredibly brief timeframe within which eligible applicants and qualifying relatives must apply for LRIF, USCIS should be flexible in the types of documents it will accept to prove the various eligibility criteria. However, the requirements with respect to documentation and evidence set forth in Section D of the Chapter 5 of the Policy Manual are onerous and create undue burden on both Liberian applicants and qualifying spouses and children.

The NDAA directs DHS to “establish a record of admission for permanent residence for the alien as of the date of the arrival of the alien in the United States.”¹⁹ The statute makes no reference to a requirement of establishing residence after that arrival as part of applying the rollback provision. Yet, USCIS directs all applicants (Liberians and family members) to “submit any evidence showing residence from the date of his or her first arrival where residence was established until the filing of the applicant’s LRIF-based adjustment application.”²⁰ First, USCIS is overreaching by imposing a residence requirement that is not in the statute. Second, even if the statute did require applicants to prove when they first established residence, the guidance in the Policy Manual is inadequate. The purported purpose of this evidence is to determine how USCIS will record the applicant’s admission date for permanent residence in applying the statute’s rollback provision.²¹ However, USCIS provides no examples of the types of evidence that might suffice to establish residence (defined as one’s “principal, actual dwelling place in fact, without regards to intent”), such as copies of leases, employment records, etc. The

¹⁷ See Immigration and Nationality Act § 244(c)(4) [hereinafter INA]; 8 CFR § 244.1.

¹⁸ See USCIS Adjudicator's Field Manual, Chapter 54 Advance Parole Documents and Boarding Letters, 54.4 Special Considerations, available at www.uscis.gov/ilink/docView/AFM/HTML/AFM/0-0-0-1/0-0-0-20442/0-0-0-20647.html.

¹⁹ NDAA *supra* note 4, Section 7611(e).

²⁰ USCIS Policy Manual, vol. 7, pt. P, ch. 5, § D.3 and D.4.

²¹ NDAA *supra* note 4, Section 7611(e).

assignment of an LPR admission date is particularly important to LRIF-eligible family members where the difference between an LPR admission date reflecting the date their I-485 was filed versus the date of their first arrival in the United States could be a matter of years or even decades.

Given the very brief one-year filing window for LRIF adjustment applications, requiring a valid Liberian passport is an onerous requirement that may prevent eligible beneficiaries from applying. For example, the statute requires applicants to establish Liberian nationality but the USCIS Policy Manual lists only two examples of acceptable evidence: an unexpired Liberian passport and a Liberian certificate of naturalization. While it indicates evidence is not limited to these enumerated examples, USCIS should provide additional examples of the types of evidence that may be sufficient, including an expired Liberian passport. USCIS should also waive the requirement for establishing Liberian nationality for LRIF applicants who have already established their nationality in order to obtain an employment authorization document based on DED by submitting a copy of their last Form I-797, Notice of Action, showing they were approved for TPS as of Sept. 30, 2007.

In the context of adjustment of status under the Cuban Adjustment Act of 1966 (CAA), Pub. L. 89-732, for instance, USCIS guidance enumerates a number of different examples of evidence that an applicant can submit to demonstrate that she is a native or citizen of Cuba. These include but are not limited to: an expired or unexpired Cuban passport; a Cuban birth certificate; a Nationality Certificate; and a Citizenship Letter.²² Similarly, applicants for adjustment under the HRIFA could submit as evidence of Haitian citizenship or nationality a birth certificate, a baptismal certificate, a passport, or evidence of derivation or acquisition of Haitian nationality.²³ Moreover, in light of the short time period for filing a HRIFA application, the adjudicating officer could waive the birth record requirement during the interview for applicants who had already indicated their Haitian nationality in a previous application for asylum or parole.

Section D of the Chapter 5 of the Policy Manual provides that applicants should submit a properly filed Form I-485 “with the correct fee.”²⁴ Nowhere in the guidance does it clarify that LRIF adjustment applicants are eligible to seek a fee waiver for the Form I-485 and biometrics, and any related I-765. Given the vulnerable nature of the LRIF-eligible population, this is critical information that should be spelled out clearly for applicants.

The NDAA does not require an interview prior to approval of a LRIF adjustment application. USCIS indicates that it may require any applicant to appear for an interview but does not provide any objective criteria as to the circumstances under which an interview would be required in order to assess eligibility.²⁵ CLINIC recommends that USCIS establish a policy that an interview will generally be unnecessary for LRIF applicants, as eligibility can be established through documentation alone, and the statute does not give USCIS discretion to deny eligible applicants. Such a policy should be articulated in the Policy Manual itself.

²² USCIS, Instructions for Form I-485 Application to Register Permanent Residence or Adjust Status at 35, available at www.uscis.gov/i-485.

²³ USCIS Adjudicator's Field Manual, Chapter 23 Adjustment of Status to Lawful Permanent Resident, 23.13 Adjustment of Status under the Haitian Refugee Immigration Fairness Act, Pub. L. 105-277 (HRIFA), available at <https://www.uscis.gov/ilink/docView/AFM/HTML/AFM/0-0-0-1/0-0-0-8624/0-0-0-10689.html>.

²⁴ USCIS Policy Manual, vol. 7, pt. P, ch. 5, § D.

²⁵ USCIS Policy Manual, vol. 7, pt. P, ch. 5, § E.1.

c. Lack of Clarity on Work Authorization

In Section F of the Chapter 5 of the Policy Manual, USCIS indicates that those with pending LRIF adjustment applications are eligible to file an I-765 application for employment authorization, either concurrently with or subsequent to the adjustment application. It provides that USCIS “must approve” the I-765 if the LRIF adjustment has been pending for more than 180 days and had not been denied. No additional details or guidance are offered. This brief section of the manual makes no reference to the language in the NDAA providing that DHS “may – (i) authorize [a LRIF applicant] to engage in employment in the United States during the period in which a determination on such application is pending; and (ii) provide such alien with an ‘employment authorized’ endorsement or other appropriate document signifying authorization of employment. This permissive language would allow USCIS, for example, to authorize immediate employment for a six-month period on the I-797 receipt notice issued to a pending adjustment applicant while he or she awaits adjudication of the I-765 and issuance of an employment authorization document.

In this section of the manual, USCIS does not clarify that applicants may submit a request to waive the I-765 filing fee. The manual should be revised to clarify that these humanitarian applicants may be able to qualify for fee waivers.

IV. Special Consideration Due to COVID-19 Crisis

Due to the unprecedented disruption to nearly all aspects of life caused by the ongoing COVID-19 pandemic, USCIS should institute several flexibilities to account for the difficulties applicants will encounter in preparing and submitting LRIF applications. As mentioned above, the congressional intent of the LRIF program is to provide certainty and security to the Liberian community, and failing to account for complications caused by a global emergency would not carry out that intent.

Our recommendation above that expired passports be affirmatively listed as acceptable evidence of nationality is made particularly important by this emergency. The Liberian Ministry of Foreign Affairs has suspended issuance of Liberian passports, so it is currently impossible to replace an expired passport.²⁶ It is unknown when passport processing will be resumed, but even once it is the demand is likely to be high and processing times for a new passport is likely to be long. USCIS should amend the policy manual to affirmatively confirm that submission of an expired passport will satisfy the nationality evidentiary requirement.

USCIS should also issue guidance to clarify how it will process cases while biometrics appointments are suspended due to the COVID-19 crisis. It is unclear how USCIS will process applications for those who have not recently completed biometrics for any other pending benefit application. Our recommendation above to hold a stakeholder engagement on LRIF processing would also be helpful to clarify issues such as this.

We also addressed above the omission of exceptions for those whose aggregate travel outside the United States since November 2014 has exceeded 180 days due to circumstances beyond their control. In the context of COVID-19, it is possible that there are travelers who have not been able to return to the

²⁶ Press Release, Ministry of Foreign Affairs Monrovia, Liberia, Amidst Coronavirus Confirmed Cases in Liberia, Foreign Ministry Suspends Issuance of Passport (Mar. 18, 2020), [www.liberianembassyus.org/uploads/PDFFiles/ebolafinance/Foreign%20Ministry%20Suspends%20issuance%20of%20Passport%20Edited%20-%20Copy%20\(2\).pdf](http://www.liberianembassyus.org/uploads/PDFFiles/ebolafinance/Foreign%20Ministry%20Suspends%20issuance%20of%20Passport%20Edited%20-%20Copy%20(2).pdf).

United States when they planned to due to travel restrictions necessitated by the pandemic. USCIS should issue instructions to reassure those whose travel has been impacted by COVID-19 that they will not be considered to have broken the continuous physical presence requirement.

USCIS should continue to monitor any other disruptions caused by the COVID-19 crisis and issue guidance to ensure that Liberians and their families are able to submit complete applications during this brief, one-year filing window for LRIF adjustment.

V. Conclusion

We request that the USCIS revise the policy manual chapter on LRIF implementation based on the objections and complications described above.

We appreciate and encourage USCIS's continued dialogue and engagement with the community and stakeholders. Thank you for your consideration of these comments. Please do not hesitate to contact Jill Marie Bussey, Director of Advocacy, at jbussey@cliniclegal.org, with any questions or concerns about our recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Anna Gallagher". The signature is written in a cursive, flowing style.

Anna Gallagher
Executive Director

cc: Michael T. Dougherty, Citizenship and Immigration Services Ombudsman