

October 25, 2019



Submitted via email to: [www.Regulations.gov](http://www.Regulations.gov)  
RIN no. 1125-AA85

**Re: Executive Office for Immigration Review (EOIR), Department of Justice (DOJ),**  
EOIR Docket No. 18-502, RIN No. 1125-AA85, A.G. Order No. 4515-2019, 84 FR 4453, Effective 8/26/2019

Dear EOIR:

I am writing on behalf of Spring Institute for Intercultural Learning to oppose DOJ EOIR's interim rule, "Organization of the Executive Office for Immigration Review." We strongly urge you to rescind the proposal to eliminate the Office of Legal Access Programs (OLAP). Transferring OLAP functions to the Office of Policy, which has no expertise in the mission to foster access to legal representation in immigration cases, violates the intent and the specific requirements of the 2016 rule that moved the Recognition and Accreditation Program (the R & A program) to OLAP after years of internal review and stakeholder engagement.

With over 800 recognized organizations and nearly 2,000 accredited representatives, the R & A program expands the accessibility of competent legal representation to immigrants at a low cost. The elimination of the R & A program will cause unnecessary delays in adjudicating nonprofit organizations' renewal recognitions and accredited representatives' applications. In turn, this will impact thousands of immigrants by causing a crisis of affordable legal counsel and leaving them vulnerable to financial burden, exploitation, and legal misrepresentation.

Spring Institute for Intercultural Learning is an OLAP-recognized organization serving refugees and immigrants with a mission to empower people and organizations to succeed across languages and cultures. Spring Institute provides a range of education, training, and direct services to refugees, immigrants, and low-income families along with services that strengthen businesses, nonprofits, and government agencies comprising our welcoming community.

Spring Institute became an OLAP-recognized organization in 2017 and subsequently provided 26 individuals with immigration legal assistance. Of those, 14 refugees and immigrants submitted their naturalization (N-400) applications along with 11 accompanying medical and fee waivers. Seven have become naturalized U.S. citizens, two completed their naturalization interviews, and five are waiting for United States Citizenship & Immigration Services to adjudicate their cases. Earlier this year, Spring Institute submitted its renewal recognition and a staff member's accreditation applications, which are pending review.

Restructuring the R & A program will significantly delay the adjudication of our application and those of other organizations alike, and, most importantly, it will undermine our ability to offer timely and affordable immigrant legal services that are urgently needed. We urge EOIR to withdraw this unnecessary rule as it will have an adverse impact on legal access programs and the thousands of immigrants they serve.

Sincerely yours,

Paula Schriefer  
President / Chief Executive Officer