

Immigrant Survivors Legal Rights, Options and Opportunities Under Family and Public Benefits Laws

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Learning Objectives

By the end of this training you will be better able to:

- Assist battered immigrants with immigration issues raised by the perpetrator to gain advantage in custody cases
- Help immigrant domestic violence and child abuse victims obtain protection orders containing creative remedies that are effective in helping immigrant victims
- Accompany immigrant victims to help them successfully obtain public benefits that they and/or their children are eligible to receive

Questions you would like answered
by the end of this workshop?

VAWA SELF-PETITIONING

OMB No. 1841-0023, Expires 09/30/18
**I-485, Application to Register
Permanent Residence or Adjust Status**

For USCIS Use Only

Applicant Name	Returned	Receipt
Apt. #	Resubmitted	

General VAWA Self-Petitioning Requirements

- Subjected to Battery or Extreme Cruelty
- By a U.S. Citizen or Permanent Resident
 - spouse,
 - parent,
 - adult son/daughter (over 21)
- With Whom self-petitioner resided
 - No time period required
- Good Moral Character
- Good Faith Marriage

How is “extreme cruelty” defined?



Forms of Extreme Cruelty

- Emotional Abuse
- Economic Abuse
- Sexual Abuse
- Coercion
- Deportation threats
- Immigration related abuse
- Intimidation
- Social Isolation
- Degradation
- Possessiveness
- Harming pets

Approved VAWA petitions

- Protection from deportation and detention
 - deferred action status.
- Legal work authorization & driver's license
 - 8 months
- Lawful permanent residency
 - 6 months -1 year if abuser is a citizen
 - 1.5- 2 years if the abuser is a lawful permanent resident

THE U-VISA FOR CRIME VICTIMS

Crime Victim (“U”) Visa Requirements

- Victim of a qualifying criminal activity
- Has been, is being, or is likely to be helpful in detection, investigation, prosecution, conviction or sentencing
- Suffered substantial physical or mental abuse as a result of the victimization
- Possesses information about the crime
- Crime occurred in the U.S. or violated U.S. law

The U-visa Process

- Government official signs certification
- Victim files U-visa application
- DHS adjudication – grants/denies U-visa
- U visa wait-list approval– 20 months
- Receives U visa – 2-3 years later
- Can apply for green card 3 years after receiving U visa
- Can apply for citizenship 5 years after green card

THE T-VISA FOR VICTIMS OF HUMAN TRAFFICKING

Human Trafficking

- Generally: use of force, fraud and/or coercion to exploit a person for profit.
- Federal statute: TVPA 2000
 - Labor and sex trafficking
- Every state now has their own Human Trafficking statute

T Visa Requirements

- Survivors of human trafficking who
- (1) Is or has been a victim of a severe form of human trafficking
 - End: trafficker obtains sex or labor
 - Adult victims must prove force, fraud or coercion
- (2) Are physically present in the United States on account of the trafficking,
- (3) Comply with any reasonable request for assistance with an investigation or prosecution, and
- (3) Would suffer extreme hardship involving unusual and severe harm upon removal from the United States

Human Trafficking Simplified

- Process:
 - Recruiting,
 - Transporting,
 - Obtaining,
 - Moving
- Means:
 - Force,
 - Fraud, or
 - Coercion
- End:
 - Labor or
 - Commercial Sex

Common Examples of Force, Fraud, or Coercion

- | | |
|---|--|
| <ul style="list-style-type: none">• Debt servitude• Surveillance• Physical barriers• Physical isolation from protections | <ul style="list-style-type: none">• Psychological isolation• Threats to deport or contact law enforcement• Threats to safety |
|---|--|

The T-visa Process

- Victim files U-visa application
- Bona fide determination = benefits access
- DHS adjudication – grants/denies – T visa
- Can apply for green card 3 years after receiving T visa
- Can apply for citizenship 5 years after green card

ACCESS TO BENEFITS AND SERVICES GROWS AS CHILDREN AND VICTIMS PURSUE IMMIGRATION RELIEF



True or False

1. Receiving public benefits can harm an immigrant victim's ability to obtain legal immigration status
2. Undocumented immigrant parents can apply for public benefits for immigrant children
3. Undocumented victims and children can access transitional housing programs
4. Federally funded health care is not available for undocumented immigrants
5. DHS requires schools and universities to ask about immigration status of applicant or enrolling students

Help Open to All Immigrants Without Regard to Immigration Status

Attorney General's List of Required Services



- In-kind services
- Provided at the community level
- Not based on the individuals income or resources
- Necessary to protect life and safety

Benefits Available to All Immigrants

- Crisis counseling and intervention
- Child and adult protection services
- Violence and abuse prevention
- Victim assistance
- Treatment of mental illness or substance abuse
- Help during adverse weather conditions
- Soup kitchens
- Community food banks
- Short-term shelter or housing assistance for the homeless, victims of domestic violence, or for runaway, abused, or abandoned children
- Nutrition programs for those requiring special assistance



Undocumented Immigrant Survivors and Transitional Housing

- Shelter and transitional housing for up to two years
- Victims of domestic violence, child abuse, neglect or abandonment and persons at risk of homelessness
 - Includes sexual assault victims
- Support for application process
- Research report

Federal Benefits Available to ALL Immigrants



- Elementary and Secondary education
- School lunch and breakfast
- WIC
- Immunizations, testing, and treatment of communicable diseases
- Emergency Medicaid



- Health Care through
 - Emergency Medicaid
 - VOCA
 - Community & Migrant Health Clinics
- www.hrsa.gov
- Enter zip code
- State funded health care
 - Benefits map
 - www.niwap.org/benefitsmap

When children qualify and their parents do not:

- If a child qualifies for benefits as a citizen or qualified immigrant the benefits granting agency may only ask questions about the child's eligibility
- No questions may be asked about the immigration status of the child's parent if the parent is not applying for additional benefits for themselves

Access to Benefits and Services Grow As Survivors Pursue Immigration Relief

- Filing immigration case leads to
 - Lawful presence
 - Continued presence/HHS certification or eligibility letter
 - State benefits access to some programs in some states
- Prima facie in VAWA , T visa bona fide; and approval of SIJS case leads to Qualified Immigrant Status
 - Federal public benefits
 - Federal Means tested public benefits (5 year bar)
 - State funded benefits
- Health care open to undocumented persons continues to be available to all

U Visa Victims Get (NM):

- Before filing:
 - Driver's license
 - Health care open to undocumented immigrants
- Upon filing: protection from deportation
- Upon wait list approval
 - Work authorization
 - Health care exchanges – no subsidies
- What states fund what benefits see <http://niwap.org/benefitsmap/>

VAWA Self-Petitioners Get (NM):

- Before filing:
 - Driver's license
 - Health care open to undocumented immigrants
- Upon filing: protection from deportation
- Upon approval: work authorization
- **Prima Facie:** \approx 2 months of filing for themselves and their children
 - Post secondary educational grants and loans
 - Public and assisted housing
 - Health care exchanges
 - Children get food stamps- SNAP
 - TANF and TANF funded child care – state funded
 - Subsidized health care - state funded

T Visa and Continued Presence Trafficking Victims Get (NM):

- Before filing:
 - Driver's license
 - Health care open to undocumented immigrants
- Upon filing: protection from deportation
- **HHS/Bona Fide** 2-4 months of filing for themselves and their children
 - Work authorization
 - Post secondary educational grants and loans
 - Public and assisted housing
 - Food stamps- SNAP
 - TANF and TANF funded childcare
 - Subsidized health care (7 years + after as qualified immigrant)
 - LIHEAP
 - SSI

Partial List of Federal Public Benefits/Community Programs Open to All “Qualified Immigrants” Includes VAWAs and Ts

- Public and assisted housing
- Post-secondary educational grants & loans
- Access to most subsidized child care
- Low income and residential energy assistance programs
- Disability benefits
- Assistance to developmentally disabled
- Job opportunities for low income individuals
- Adoption assistance
- Foster care
- Social services block grant programs
- Supportive housing for the elderly or disabled

State Funded Benefits in New Mexico

- TANF & and TANF Funded Child Care
 - Qualified immigrants including : VAWA prima facie, T bona fide
- Medicaid/SCHIP
 - 4 months post filing --VAWA self-petitioners and their children
 - Subsidized child health care, prenatal care, health care
 - 20 months post filing – U visas
 - Access to health care exchanges – no subsidies
 - Right after filing -- SIJS

Reading and Resources

- Programs Open to Immigrant Victims and All Immigrants Without Regard to Immigration Status
<http://niwaplibrary.wcl.american.edu/pubs/programs-open-to-all-imigrants/>
- Access to Publicly Funded Legal Services for Battered Immigrants
<http://niwaplibrary.wcl.american.edu/pubs/imm-qref-accesstolegalservices/>
- Public Benefits Flow Charts (VAWA, SIJS, U and T Visas)
<http://niwaplibrary.wcl.american.edu/pubs/public-benefits-flow-charts/>
- State by state public benefits map
<http://niwap.org/benefitsmap/>

Issues That Arise for Immigrant Victims in Family Law Cases

Family Court Jurisdiction: Immigrant Victims

- **Protection orders**
 - Domestic violence crime committed in state or
 - Victim needs protection in state
- **Divorce**
 - Residency of party in state
 - Legal immigration status not required to establish residency under state family laws
- **Custody-Guardianship**
 - (UCCJEA, Federal PKPA, Hague Convention) - home state of children
- **Child abuse, neglect, termination of parental rights**
 - Where an abused or neglected child is located.
- **Child support**
 - Where child or non-custodial parent lives

Impact of Divorce

- VAWA self-petitioners
 - Must file within two years of final divorce
- Spouses and children of visa holders ends legal immigration status in the United States:
 - Students, Persons with legal work visas, Diplomats
- Divorce cuts off access to lawful permanent residency for spouses and children of people seeking lawful permanent residency based on:
 - Employment based
 - Asylees
 - Family based
 - Cancellation of removal applicants

Annulment Instead of Divorce

- Annulment can lead to a marriage fraud finding that:
 - Permanently bars approval of any visa petition
 - Is a ground for deportation
 - Can lead to an unfavorable exercise of discretion by an immigration judge not to grant immigration relief
- Impact on
 - Spousal support
 - Property division

Protection Orders and Immigrant Victims

Protection Orders and Immigration Status

- Issuance of a protection order has no effect on immigration status of the abuser
- Violation of a protection order is a deportable offense
 - Violations of “ the portion of a protection order that involves protection against credible threats of violence, repeated harassment, or bodily injury to the person or persons for whom the protection order was issued is deportable”
 - Not custody and support provisions
- If a protection order is issued against a victim it can place her one-step away from deportation

Mutual Protection Orders and Protection Orders Issued Against Victims - Discussion

- Typical Scenario
 - Police arrive at domestic violence incident, perpetrator speaks English, Perpetrator interprets for the police
 - Police see victims injuries but take no action and advise the parties about protection order
 - Perpetrator files for a protection order against the victim
 - Victim is served and then also seeks a protection order
 - Perpetrators seek such orders against immigrant victims as a tactic to undermine the victim's immigration case

Issue Jurisdictionally Sound and Enforceable Protection Orders

- AVOID
 - Mutual Protection Orders – Prohibited in UT except under limited circumstances
 - Orders entered without a finding of abuse
- Issuing jurisdictionally sound consent protection orders
 - OVW Funded Training Materials:
 - *Jurisdictionally Sound Civil Protection Orders*
 - <http://niwaplibrary.wcl.american.edu/family-law-for-immigrants/protective-orders/CH5.3%20BB%20No%20Findings%20CPOs%20with%20disc.%207.3.13.pdf/view>

Effect of protection order issued against immigrant victims

- Increases perpetrators power and coercive control because the victim is one step away from deportation
- Perpetrators who are successful in convincing courts to issue protection orders are often also successful obtaining findings that the victim violated the order
- This can pose serious safety concerns for victims
 - **A violation of a protection order is a deportable offense**

Creative Protection Order Remedies

- Catch all provisions included in all state statutes
- Offer any additional relief that may potentially
 - Curb future abuse, harassment
 - Interfere with abuser/perpetrators ability to exert power and/or control
 - Offer victim remedy-relief for past abuse
 - Help victim overcome victimization and build new post abuse life
- Nexus With Victimization
- Opportunity for courts to counter immigration related abuse

Victims Who Stay: Full Contact Protection Orders

- No state's protection order statute requires separation of the parties
- In virtually every state victims cannot violate their own protection orders
 - Contrary to statutory intentions; and
 - Against public policy to prosecute abused women for complicity in violating their own orders.
- Provisions
 - No abuse
 - Counseling

Suggestions for Court Orders that help VAWA applicants: Examples

- Turn over documents/evidence in abuser's control that she needs for her immigration case. E.g.,
 - Passports
 - Identification documents
 - Copies of documents from any immigration case filed on the victim's or the children's behalf
 - Love letters
 - Family photos

A protection order or discovery can help a victim obtain needed evidence:

- Marriage certificate
- Wedding/family pictures
- Birth certificates
- Love letters
- Copies of joint leases/utility bills
- Police, medical, court documents about the relationship,
- Copy of abuser's green card or passport

Protection order or discovery continued

- School records
- Medical records
- Employment records
- Social security number information
- Health insurance
- Children's birth certificates
- Letters and other mail addressed to the victim and to the abuser at the same address
- Copy of I-130 petition

Catch-all Provisions Preventing Immigration Related Abuse

- Defendant must obtain prior court approval before contacting any government agency (immigration officials, CPS, IRS, Welfare etc.) concerning the petitioner except
 - Police emergency
 - Subpoena
- Cooperate in and not withdraw any case he has filed for petitioner with immigration authorities

Provisions that Deter Parental Kidnapping

- Not remove the children from the court's jurisdiction
- Turn over passports of parties and/or children
- Sign statement that no visa or passport should be issued to children absent court order.
- Supervised visitation
- Bond

Important Economic Provisions

- Maintain medical, car, house insurance, mortgage, rent, utility and/or debt payments
- Child support and spousal support
- Injunctions against third party institutions not to respond to acts by the abuser that would harm her (banks, retirement funds, utility companies)
- Taxes
 - Turn over income tax statements
 - Victim named trustee for receipt of tax return funds, respondent ordered to sign check
 - Victim awarded exclusive right to claim children as tax exemptions
 - Respondent pays victim $\frac{1}{2}$ of return

Reading and Resources

- Creative Protection Order Remedies for Protecting Battered Immigrants
<http://niwaplibrary.wcl.american.edu/pubs/creative-cpo-batimms/>
- Protection Orders and Battered Immigrants: The Impact of Attorneys and Advocates
<http://niwaplibrary.wcl.american.edu/pubs/battered-imms-cpo-advocacy/>
- Bench Card: Immigrants and Protection Orders
<http://niwaplibrary.wcl.american.edu/pubs/bchcrd-immigrantscpo/>

Custody of Children in Immigrant Families

Protecting Immigrant Mothers, Protects Children

- Immigrant victims who receive help, including immigration relief, child abuse likelihood drops significantly (77% to 23%).
- Children of help seekers 20% less likely to have abuser threaten them
- One third less likely to have abuser threaten to take them away from their mother

Materials Immigrant Victims and Custody Bench Card -<http://niwaplibrary.wcl.american.edu/reference/additional-materials/materials-for-adjudicators-and-judges/tools-for-courts/family-law>

Is Immigration Status Relevant to Custody?

- Relevant to: Immigrant crime victim presents evidence of immigration related abuse, power and control suffered
 - Either not filing or withdrawing immigration papers
 - Threats to turn victim in for deportation
 - Part of history of violence
- Not relevant to:
 - Core primary caretaker determination
 - Evaluation of parenting skills
 - Best interests of the child determination
 - Requirements regarding custody awards to non-abusive parent



Best Interests and Immigration

- Not factors:
 - Immigration status
 - English language proficiency
- Laws discouraging no award of custody to abuser apply equally to immigrant victims
- Immigration information distracts the judge from best interest factors in the statute
- Immigrant victims in custody cases will qualify for
 - VAWA, U visa
 - DHS victim/witness protections
 - Humanitarian Release

ABA Center on Children & The Law

- “Parties should not be able to raise, and courts should not consider, immigration status of domestic violence victims and their children in civil protection order, custody, divorce or child support proceedings.”
- “Batterers whose victims are immigrant parents use threats of deportation to avoid criminal prosecution for battering and to shift the focus of family court proceedings away from their violent acts...When the judicial system condones these tactics, children suffer.”
- “This ... will ensure that children of immigrant domestic violence victims will benefit from ...laws (like presumptions against awarding custody or unsupervised visitation to batterers) in the same manner as all other children.”

Immigrant Parents and Child Custody

In re Interest of Angelica L., 277 Neb. 984 (2009)

- Parents have a Constitutional right to custody (absent unfitness)
- Applies to all families without regard to:
 - Undocumented immigration status
 - Immigration detention
 - Deportation
- Overriding presumption that:
 - Parent-child relationship is constitutionally protected
 - In children's best interest to stay with/be reunited with their parent(s)
- Child's best interests is most important
 - A comparison of natural vs. adoptive parent's cultures, countries or financial means is not to be made

Myth vs. Fact:

Parents Without Legal Immigration Status

Myth

1. Deportation is imminent
2. Parent is likely to flee U.S. with child
3. The parent has no livelihood
4. Legally present parent must have custody in order to file for benefits for child

Fact

1. DHS policies prevent detention/removal of immigrant parents who are:
 - Parents of U.S. citizen/Lawful permanent resident children
 - Primary caretaker parents of minor children without regard to the child's immigration status
2. Legal immigrants/naturalized citizens are more likely to flee with children, especially when
 - There have been threats of kidnapping children
 - They are dual nationals
 - They travel freely to and from U.S.
3. Abused immigrant parents in family court have a path to immigration relief, work authorization & some benefits
4. Custody does not affect parent's ability to file for or gain immigration benefits for their children.

How Immigrant Parents End Up In Department of Homeland Security Custody

- Abusers/crime perpetrators/employers report them
 - VAWA self-petitions 38.3%; U visas 26.7%
- Traffic stops
 - VAWA self-petitions 28.6%; U visas 30.1%
- Immigration enforcement at the worksite
- CPS, welfare workers, health care providers, others
- Victims call the police for help and police
 - Make a dual arrest;
 - Fail to obtain qualified interpreter and arrest the victim
 - Under Secure Communities program all arrested persons reported to DHS

Parental Interest Directive Aug 2013

- If parents are detained:
 - Placement near children and family court
 - Bring parents to family court to participate in cases involving children
 - Facilitate visitation
 - Help children travel with deported parent – obtain passports for children
 - Bring deported parents back to the US for custody and parental rights cases

Custody Involving Immigrant Parents and/or Immigrant Children

- Accurate information about immigration status helps judges issue fair rulings in custody cases where immigration status of a parent or child may be raised
- Tools for Judges
 - Help avoid reliance on incorrect information provided by parties about immigration status & likelihood of detention or deportation
 - Provide accurate information when needed
 - www.Niwap.org/go/sji
 - Direct technical assistance to state court judges, commissioners, magistrates, court staff
 - Bench cards, charts, training materials and webinars
 - In person SJI funded trainings in states/local jurisdictions



Reading and Resources

- Family Court Bench Card on Issues that Arise in Custody Cases Involving Immigrant Parents, Children, and Crime Victims
<http://niwaplibrary.wcl.american.edu/pubs/bchcrd-immigrants-custody/>
- How to get a detained parent to court
<http://niwaplibrary.wcl.american.edu/pubs/detained-parent-to-court/>

When Federal Immigration Laws Create a Role for State Courts: Special Immigrant Juvenile Status and the U Visa

State Courts' Role:

- Provide parties (children and parents) basic information about immigration options by distributing the DHS pamphlet
- Make detailed findings
- Increases courts options for orders re: children and custodial parents, guardians and kinship care:
 - Greater access to state and federal public benefits
 - Can obtain drivers licenses
 - Legal work authorization
 - Protection from deportation

Federal Immigration Law Create Two Specific Roles for State Court Judges

- SIJS required findings
- U visa certification

SPECIAL IMMIGRANT JUVENILE STATUS (SIJS)

SIJS Requirements

- Must be under the jurisdiction of a “juvenile” court
 - Federal statute accepts applications up to 21 years old but the age of majority is 18 in most states
 - Must be unmarried
- Must have qualifying state court order that:
 - Places the child with an individual, entity, or agency; and
 - Makes three findings based on state law
 - That the child was abused, abandoned, or neglected by one or both parents;
 - That reunification with the abusive parent is not viable; and
 - That it is not in the child’s best interest to be returned to the child’s home country
- All as defined under state law

SIJS Statutory Amendments Not Reflected in the Current Regulation

- Any state court with jurisdiction to address care, custody, placement, dependency of a child
 - Long term foster care not required
 - Eligibility extended to children with a non-abusive parent
- State courts make findings of “abuse, abandonment, or neglect”
 - Apply state law without regard to where abuse occurred
 - DHS may not inquire about details of the abuse from youth applicant or contact abusive parents

All of the Following are Potentially Eligible for SIJS

- A minor who is:
 - Abused, abandoned or neglected
 - In the U.S.
 - In the home country
 - Living with their
 - Non-abusive parent
 - Guardian
 - Adopted parent
 - State foster care
 - Federal foster care (ORR)

Immigrant Children Eligible for SIJS

- Case before the court involving care, placement, custody, dependency of a child:
 - Child without a U.S. birth certificate or lawful permanent residency
 - When there is evidence of abuse, abandonment, or neglect by one parent
 - Foreign born child may be SIJS eligible
- The state court order does **not** award SIJS
 - **ONLY DHS can provide legal immigration status**

SIJS Findings Possible In ...

- Divorce
- Custody
- Legal separation
- Child support
- Child abuse
- Termination of parental rights
- Paternity
- Adoption
- Protection order
- Guardianship
- Motions for Declaratory Judgments
- Dependency
- Delinquency

Procedural Issues: May require consolidation of cases to attain ability to make needed findings

Order must be issued before the age of majority in the state

What Children with SIJ Status Receive

- While case is pending

- Protection from deportation and removal
- As lawfully present children – health care exchanges (no subsidies)
- Legal work authorization
- Programs and services necessary to protect life and safety

- At approval

- Lawful permanent residency
- Eligible for citizenship after 5 years
- Food stamps, Post secondary educational grants and loans, public and assisted housing

SIJ's may NEVER file family petition their natural parents

U Visas and U Visa Certification

U Visa for Immigrant Victims

- A victim of qualifying criminal activity is eligible for a U Visa when:
 - The criminal activity occurred in the U.S. **or** violated U.S. law;
 - The victims possesses information about the crime;
 - The victim has been, is being, or is likely to be helpful in the detection, investigation, prosecution, conviction or sentencing of the offense; and
 - The victim has suffered substantial physical or mental abuse as a result of the victimization

The U-visa Application Process



Typical length of process = 12 -14 months

Helpfulness in the Regulations

- Under the statute, DHS determines whether a victim:
 - has been helpful, is being helpful or is likely to be helpful in the
 - Detection, or Investigation, or Prosecution, or Conviction or Sentencing
- Any helpfulness is sufficient
- Judges and law enforcement may complete U visa certification if they observe or detect a victim's helpfulness
- The investigation, prosecution or case can still be ongoing

Examples of Helpfulness

- Calling 911 to report a crime
- Filing a police report
- Providing a statement to the police or court
- Seeking a protection order
- Providing information to prosecutors
- Serving as a witness in a prior prosecution or investigation
- Testimony in a sentencing hearing

Certifying Judges Will Need to Amend Form

- Judges may amend the language of the form to accurately reflect the basis upon which the judge is signing the certification.
 - Probable cause, findings, rulings
 - Include the type of proceeding and
 - If orders were issued attach a copy of the order
- Judges can should amend current form --examples:
 - Based upon my having probable cause I certify”
 - Based upon my issuance of a civil protection order ...I certify”
 - Based on my having presided over the criminal case ... I certify”
 - “Based upon my findings in a [custody/divorce] case of [domestic violence/child abuse] ... I certify”

Things to Know About Certifying

- “Do I believe this person was a victim of a qualifying crime?”
- “Did the person assist or willing to assist in detection, investigation, conviction, prosecution and/or sentencing?”
- Question is **NOT**:
 - Is/was there a prosecution?
 - Was there an arrest of the offender?
 - Do I have proof beyond a reasonable doubt?
 - Is this within the statute of limitations?
 - Was there a conviction?

Minnesota Judicial Ethics Opinion U Visa Certification

- June 26, 2015
- Presiding judge may certify after a criminal case is completed
 - Certification in a pending criminal case can implicate ethics concerns, e.g. notice to avoid ex parte communication
- Sufficient evidence exists for certification in civil cases, including civil protection orders or child custody
- Limited circumstances where a judge may certify who was not assigned to the case

Full Opinion Available at: <http://www.bjs.state.mn.us/file/advisory-opinions/opinion-2015-2-final.pdf>

Hon. Pendleton also published a training update based on the opinion at <http://pendletonupdates.com/>

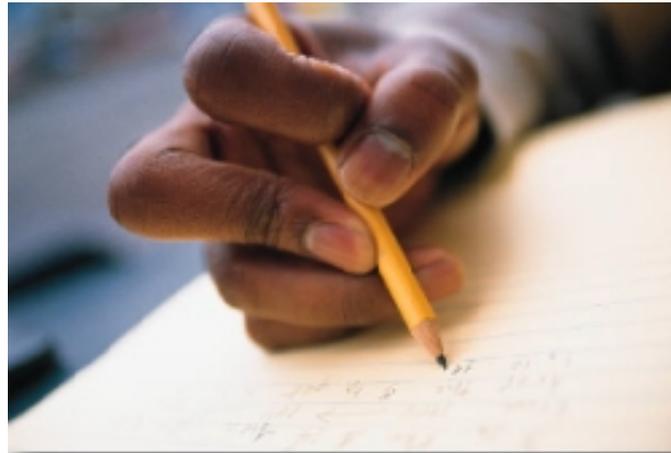
Technical Assistance and Materials

- Power Point presentations and materials for this conference at www.niwap.org/go/NM2016
- **NIWAP Technical Assistance:**
 - Call (202) 274-4457
 - E-mail info@niwap.org
- Web Library: www.niwaplibrary.wcl.american.edu

Questions



Evaluations



Thank you!