

To: Phyllis A. Coven, USCIS Ombudsman,  
Office of the Citizenship and Immigration Services, Ombudsman, Department of Homeland Security

From: Leslye E. Orloff, Adjunct Professor and Director, and Rafaela Rodrigues, Immigrant Women Law and Policy Fellow, National Immigrant Women's Advocacy Project, American University, Washington College of Law

Re: Setting Up the Crime and Abuse Victim Protection Directorate at USCIS

Date: August 23, 2022

Dear Ombudsman Coven,

Thank you and the staff at the USCIS Ombudsman's Office for meeting with us on August 8, 2022. We are writing to follow up on that conversation and to provide the CIS Ombudsman with the promised documents and a more detailed outline of our proposal for the creation of a new Crime and Abuse Victim Protection Directorate at USCIS. NIWAP has a long history of working with DHS, USCIS and INS over the decades. Through our partners that include judges, law enforcement, prosecutors, attorneys, and victim advocates we have identified various issues that impact survivors of family violence, trafficking, and abuse. In particular, the current long wait times in processing humanitarian visas, along with inconsistencies in adjudication of these applications have had the unintended consequence of placing immigrant victims at more risk of harm. During these long waits, survivors are more vulnerable to threats from their abusers, witness tampering and intimidation, especially if they continue to participate in the criminal justice process or assert their rights in civil family court proceedings.

There is an urgent need for improving how USCIS is serving immigrant victims of crime and abuse to align with more effectively and fully implement the Congressional intent of enhancing protection and supporting justice system participation of immigrant victims of crime and abuse that are enshrined in the Violence Against Women Act, the Trafficking Victim Protection Act, and their continual improvements through reauthorizations over the past decades.<sup>1</sup>

In 1997 INS recognized that a team of specially trained adjudicators with expertise on domestic violence and child abuse was needed to safely, effectively, and efficiently adjudicate cases involving the Violence Against Women Act's (VAWA's) immigration protections in a manner that also complied with VAWA's confidentiality requirements (8 U.S.C. 1367).<sup>2</sup> Recognizing the benefits for both crime victims and DHS of having a single team of adjudicators with training on the dynamics of crime victimization and abuse, DHS, with Congressional support, sent adjudications of U visas, T visas and INA Section 105 work authorizations for adjudication to the same VAWA adjudication unit. Unfortunately, however, adjudication of humanitarian forms of immigration relief designed to offer lifesaving protection to victims of crime and abuse has been housed in two Directorates with priorities that differ from these humanitarian goals. VAWA self-petitions, T visas, U visas and Section 105 work authorization adjudications are housed in the Service Center Operations Directorate (SCOPS) (e.g.,

<sup>1</sup> See Attachment A – VAWA 2005 Immigration Legislative History HR3402LegRpt (Bi-Partisan House Judiciary Committee Report with key sections highlighted).

<sup>2</sup> Memorandum from Paul Virtue, Acting Executive Associate Commissioner, Office of Programs, Immigration and Naturalization Service, to Regional Directors, District Directors, Officers-in-Charge, & Service Center Directors, Immigration and Naturalization Service, Supplemental Guidance on Battered Alien Self-petitioning Process and Related Issues 1 (May 6, 1997), available at: <https://niwaplibrary.wcl.american.edu/pubs/conf-vaawa-gov-virtuememoguidancesec384-05-06-1997>

VAWA, T visas, U visas, Section 105 work authorizations). Battered Spouse Waivers, Special Immigrant Juvenile Status applications are housed in the Field Operations Directorate. This management structure has caused and/or augmented numerous problems with the adjudication of each of the case types that offer relief to victims of crime and abuse.

Problems NIWAP staff and partners have seen in our work as national technical assistance providers and trainers and as programs serving victims in our communities include:

- Long wait times to meaningful protective relief offered by work authorization, deferred action, and/or approval of victim's cases
- 24 months delay in adjudication of adjustment of status for U visa applicants, leading to USCIS issuing RFEs for a new I-693 medical exam as they are good only for two years, thus creating an additional expense and delay for victims
- During adjustment of status process, RFEs aiming at re-adjudicating inadmissibility grounds already waived during the U visa process
- Inconsistencies in adjudications and issuance of requests for further evidence between adjudications conducted by expert staff and staff with little or no training. Compare for example adjudications of --
  - VAWA self-petitions and battered spouse waiver applications in cases involving abused immigrant spouses of U.S. citizens
  - U visas by the Vermont Service Center (VSC) and the Nebraska Service Center
- Problems with VAWA confidentiality and address confidentiality compliance, particularly for cases filed at locations other than the VSC.

While there are some problems that require statutory change (e.g., the 10,000 cap on U visas), this memo and proposal focuses on what USCIS can do now to reduce the burden and dangers for victims posed by the current long, arduous, inconsistent, and unpredictable current case adjudication process. Evidence-based research has found that real change for immigrant victims of crime and abuse occurs when victims receive deferred action and work authorization and accelerates<sup>3</sup> as victims move through the immigration process receiving approval of their cases, visas, lawful permanent residence and ultimately naturalization.

Our proposal aims to alleviate these unintended negative consequences while ensuring that US CIS staff is properly trained while conserving resources and reducing administrative waste. We propose the creation of a fully trained, specialized Crime and Abuse Victim Protection Directorate that would process all aspects of crime victim-based immigration relief, including multiple applications of the same person/family, for the following case types: VAWA self-petitions, Battered Spouse Waivers, U visas, T visas, SIJS, and Section 105 employment authorization documents for abused spouses of A, E (iii), G and H visa holders.

These recommendations would significantly reduce “pain points” and facilitate safety planning for immigrant victim petitions and applicants in the VAWA, U visa, T visa, Battered Spouse Waiver and

---

<sup>3</sup> Leslye E. Orloff, Haley Iesha Magwood, Yasmin Campos-Mendez, and Giselle A. Hass, *Transforming Lives: How the VAWA Self-petition and U Visa Change the Lives of Survivors and their Children After Employment Authorization and Legal Immigration Status* (June 8, 2021) available at: <https://niwaplibrary.wcl.american.edu/pubs/transforming-lives-final-report> ; Executive Summary available at: <https://niwaplibrary.wcl.american.edu/pubs/executive-summary-final>

SIJS programs and would significantly reduce delays and promote consistency in adjudication of survivors' cases. Our full proposal and recommendations for this new Directorate are below

## I. The Need for USCIS to Create a Crime and Abuse Protection Directorate

DHS/USCIS duty to protect and assist noncitizen crime victims is enshrined in VAWA, TVPA, SIJS, Battered Spouse Waiver statutes and their multiple reauthorizations over the past 32 years. Congress created victim-based forms of immigration relief to offer humanitarian protection to victims and to encourage noncitizen victims to seek assistance and report crimes and abuse committed against them without regard to the victims' immigration status. USCIS needs to implement these congressionally created immigration relief for crime victims in a manner that ensures that these humanitarian visas are of equal importance to all other paths to legal immigration status that USCIS adjudicates. In order to better serve immigrant victims of crime and abuse USCIS, and all of DHS, should adopt a victim centered approach to its work that is trauma-informed employing practices that equally value:

- Detection, investigation, and prosecution of perpetrators of crime and abuse
  - Holding offenders accountable
    - Through criminal, family, child welfare, and/or civil justice systems
- Identification and stabilization of victims by providing immigration relief and access with timeliness and predictability to:
  - VAWA confidentiality protections
  - Formal protection from deportation (deferred action, granting visas)
  - Work authorization
  - Lawful permanent residence

The delays in adjudication can have a devastating impact on survivors of intimate partner violence (IPV), sexual assault, and other crimes and their children. The constraints that stem from an inability to work lawfully to support themselves and their children often places victims in the unconscionable position of having to remain in or return to the violent homes or workplaces they sought to abandon, or to subject themselves to other abusive and exploitative situations as they struggle to survive.<sup>4</sup>

In addition, research shows the benefits of attaining deferred action and receiving work authorization are transformative in the lives of immigrant survivors and their children. Evidence-based research demonstrates that once immigrant survivors of crime or abuse attain deferred action and work authorization their lives improve significantly and continue to improve as victims gain lawful permanent residence. Some of the findings include:

- Greater justice system involvement
  - VAWA self- petitioners (62% participate in criminal investigations and prosecutions, 63% seek protection orders, and 60% turn to the courts for child custody orders)

---

<sup>4</sup> Krisztina E. Szabo, David Stauffer, et. al., Early Access to Work Authorization For VAWA Self-Petitioners and U Visa Applicants, NIWAP, (Feb. 12, 2014) [https://niwaplibrary.wcl.american.edu/pubs/final\\_report-on-early-access-to-ead\\_02-12;](https://niwaplibrary.wcl.american.edu/pubs/final_report-on-early-access-to-ead_02-12;)

- U visa applicants (70% participating in active criminal prosecutions and investigations, 67% seek protection orders and 64% seek custody orders)<sup>5</sup>

At work authorization and deferred action:

- 114% increase in willingness to trust police;
- 36% increase in victims making police reports about future crimes;
- 74% reduction in immigration-related abuse;
- 78% less threats to cut off victim from children;
- 65% reduction in perpetrators using immigration status against the victim in custody cases;
- 22% of survivors are actively involved in helping other victims access help and justice;
- 300% increase in jobs that pay at least a minimum wage;
- 226% increase in survivors taking ESL classes and 167% increase working to improve speaking English;
- 35% obtain GEDs, 38% pursue AAs and BAs, and 21% receive vocational education; and
- 6.6-fold increase in survivors' involvement in their children's schools.<sup>6</sup>

Transformations in the lives of victims and their children begin at deferred action and work authorization, with victims becoming more and more stable and engaged as victims move through the process awaiting final adjudication. By the time they attain lawful permanent residence compared to filing changes reported include:<sup>7</sup>

- 128% increase in willingness to trust police;
- 97% reduction in immigration-related abuse;
- 77% reduction in sexual assault or attempted sexual assault at work;
- 133% increase in familiarity with and use of supportive resources;
- 65% of survivor's children's grades improve (compared to 29% at work authorization);
- Survivor's children have decreased disciplinary problems 125% and are less aggressive 80%; and
- Survivors have fewer health problems (475%), are less depressed (216%); sleep better (375%); are calmer (315%); more focused (261%) and easier to make decisions (432%).

## II. Current Problems and Their Impact On Victims

Long processing times can re-victimize survivors of crime and abuse: Attorneys have seen cases, especially in rural areas, where victims must choose between staying with their abusers or leaving their perpetrators and having to find jobs to survive. The long wait times in processing cases, often result in

<sup>5</sup> Krisztina E. Szabo et al., Early Access to Work Authorization For VAWA Self-Petitioners and U Visa Applicants, (Feb. 12, 2014) [https://niwaplibrary.wcl.american.edu/pubs/final\\_report-on-early-access-to-ead\\_02-12](https://niwaplibrary.wcl.american.edu/pubs/final_report-on-early-access-to-ead_02-12); Rafaela Rodrigues et al. Promoting Access to Justice for Immigrant and Limited English Proficient Crime Victims in an Age of Increased Immigration Enforcement: Initial Report from a 2017 National Survey (May 3, 2018) <https://niwaplibrary.wcl.american.edu/pubs/immigrant-access-to-justice-national-report>; Leslye Orloff, et. al., U Visa Victims and Lawful Permanent Residency 5 (September 6, 2012) (70% continued cooperation and 29% victims were willing to cooperate if their criminal case went forward) <https://niwaplibrary.wcl.american.edu/pubs/pb-tkit-uvisalawfulpermanentresidency-9-6-12>.

<sup>6</sup> Leslye E. Orloff, et al., Transforming Lives: How the VAWA Self-petition and U Visa Change the Lives of Victims and their Children After Work-Authorization and Legal Immigration Status, Executive Summary, (2021) available at: <https://niwaplibrary.wcl.american.edu/pubs/executive-summary-final>.

<sup>7</sup> Leslye E. Orloff, et al., Transforming Lives: How the VAWA Self-petition and U Visa Change the Lives of Victims and their Children After Work-Authorization and Legal Immigration Status, NIWAP (2021). Full report available at: <https://niwaplibrary.wcl.american.edu/pubs/transforming-lives-final-report>.

victims being forced into work situations where they are open to exploitation and abuse by their employers including suffering sexual or other violence. The delay in granting employment authorizations can often contribute to financial instability, additional exploitation and harm, and re-victimization of crime victims.

USCIS should create a reliable system for adjudicating victims' that would result in review of cases and issuance of deferred action and work authorization in a predictable time frame, ideally 6 months. This allows victims to work with advocates and attorneys more effectively to safety plan to cover the finite predictable time period from filing to work authorization when they are most susceptible to the abuser's threats and attempts to harm them and trigger immigration enforcement actions against them. The delays in case processing times to work authorization and deferred action impact all crime victim case types -- U visa (61.5 months), VAWA self-petition (26 months), T visa (21 months) and SIJS cases (adjudications are within 6 months but it takes 12 months to receive work authorization).

Long processing times from filing to adjudication are the result of several factors in USCIS' control that USCIS has the ability to remedy by creating a Directorate for all crime victim case types and all decisions related to these case types. Key causes of long delays include:

- Reassigning Adjudicators: Assigning adjudicators with special training on domestic violence, child abuse, and crime victimization from the VAWA, T and U visa caseloads to work on fee generating case types that SCOPs has prioritized over crime victim cases;
- Failures to Follow USCIS Policy: Lack of high-quality training of adjudicators and supervisors coupled with insufficient supervision that leads to case denials and requests for further evidence (RFEs) being issued that are unnecessary and/or contrary to agency policy. Examples include:
  - Rejecting of U visa certifications using older certification forms when the USCIS website stated that the old form could be used through January 2023 (NSC);
  - Failure to serve RFEs and notices of intent to deny at victim's safe address when the victim has an attorney. When attorney's address changed victim's case was denied and victim was placed in removal proceedings
- Problems with Untrained Field Officers:
  - Adjudicating Battered Spouse Waiver Cases: Untrained adjudicators handling Battered Spouse Waiver cases at field offices and service centers across the country leads to long delays in battered spouse waiver adjudications, widely varied outcomes, and delays associated with unnecessary interviews.<sup>8</sup> As a result cases filed by abused spouses of U.S. citizens receive significantly different treatment if the case is a VAWA self-petition or a battered spouse waiver case. When the abuser originally filed a family-based visa petition I-130 and the victim received conditional permanent residence and need to file a Battered Spouse Waiver the cases are adjudicated by untrained field office officials and do not receive treatment equivalent to VAWA self-petitions.
  - VAWA Self-Petition Adjustment Interviews: Problems arise for similar reasons involving field office staff without specialized training in domestic violence and child abuse involved with interviewing approved self-petitioners for their lawful permanent

---

<sup>8</sup> Kavell Joseph, Amanda Davis, and Leslye E. Orloff, Moving Battered Spouse Waiver Adjudications to the VAWA Unit: A Call for Consistency and Safety National Survey Findings Highlights (February 6, 2017, Update October 18, 2021) <https://niwaplibrary.wcl.american.edu/pubs/battered-spouse-waiver-report>.



residence applications. When untrained field officers try to re-adjudicate the VAWA self-petition contrary to USCIS policy.<sup>9</sup>

Errors on application decisions and employment dates: Attorneys have also reported receiving Employment Authorization Documents and approval notices that contain errors – such as misspelled names, incorrect dates of eligibility, etc. These errors create additional work for USCIS staff who need to correct them and increase delays for victims in receiving the documentation that they need to gain stability.

Rejecting the certification from judges: We are also seeing cases where the NSC and VSC have rejected correctly completed U visa certification forms (Form I-918 Supplement B) signed by state court Judges. When this issue was brought to USCIS' attention, VSC supervisors were notified and immediately intervened to train their adjudicators on the validity of judicial certifications. This swiftly corrected the problem and we have not seen these rejections from officers at VSC anymore. However, when the same problem occurred at the NSC, bringing the problem to U visa supervisors did not solve the problem. The adjudicators did not receive the necessary training and NSC supervisors continued to sign off on RFEs and case denials stating that U visa certifications from judges were not sufficient to support a U visa application because they were not signed by a law enforcement official. It took a lot of work on a case-by-case basis involving several cases including involvement of Headquarters to resolve the issue which was unnecessary and inefficient.

Long waits to employment authorization in SIJS cases: USCIS recently issued a policy granting deferred action and work authorization to children whose SIJS applications are approved who are not currently eligible to file for adjustment of status to lawful permanent residence. Although USCIS is currently adjudicating cases filed by SIJS children within approximately 6 months<sup>10</sup> of filing, approved SIJS children are having to wait 12 months before they receive work authorization. This delay harms children in the 33 states where work authorization is a prerequisite to receiving a driver's license or state issued ID. This is also particularly harmful to SIJS children whose parent who perpetrated the abuse or neglect is in the U.S. and threatening the child's deportation.

Current case processing system created longer backlogs in all victim-based case types: Many immigrant crime victims are eligible for multiple forms of crime victim related immigration relief. Under the current system with some cases adjudicated by SCOPS and some case or parts of cases adjudicated by Field Offices USCIS lacks the flexibility to adopt the effective one case one family approach to family violence cases that has worked well in state courts. For example, there are many concurrent domestic violence and child abuse U visa cases where the abused children also qualify for SIJS. There are also cases in which trafficking is occurring in families where in addition to T visa applications there are VAWA self-petitions, SIJS applications or U visas filed. The current adjudication structure results in filing of multiple cases and issuance often of multiple RFEs that could be avoided if all the cases involving the same victims were adjudicated by the same team of adjudicators with specialized training on domestic violence, child abuse, stalking, human trafficking, and crime victimization.

---

<sup>9</sup> Some evidence of the difficulties in both VAWA self-petition adjustment interviews and Battered Spouse Waiver cases is revealed in the response to NIWAP's FOIA request on battered spouse waiver adjudications which provides evidence difficulties field office staff have with VAWA confidentiality and with their correct role in VAWA self-petitioner adjustment of status interviews. FOIA USCIS Response to NIWAP's FOIA on Battered Spouse Waiver Cases and Case Processing (August 25, 2017) <https://niwaplibrary.wcl.american.edu/pubs/foia-bsw-response-2017>.

<sup>10</sup> It is important to note that for other case types the processing times are accessible through the USCIS website. The check case processing times page does not provide any information about SIJS case adjudications or the wait-times to adjustment of status for approved SIJS children.

### III. Solution: Create a Crime and Abuse Victim Protection Directorate

By creating a new Directorate in which USCIS would consolidate processing and adjudication of all crime victim case types USCIS could implement a victim-centered, trauma-informed, and customer service responsive approach to cases involving vulnerable immigrant survivors of crime and abuse.

- Directorate Name: Crime and Abuse Victim Protection Directorate
- The new Crime and Abuse Victim Protection Directorate would:
  - Improve customer service;
  - Have specialized training for all staff, adjudicators and supervisors;
  - Be victim centered and trauma informed;
  - Promote efficiency;
  - Bring down processing backlogs;
  - Promote fraud detection without harming victims; and
  - Implement Congressional directives in the VAWA 2005 legislative history.<sup>11</sup>
- For processing of all aspects of crime victim based immigration relief for the following case types:
  - VAWA self-petitions;
  - Battered Spouse Waivers;
  - U-visas;
  - T-visas;
  - SIJS;
  - Section 105 employment authorizations for abused spouses of A, E (iii), G and H nonimmigrant visa holders; and
  - Play a role in promoting access to continued presence for trafficking victims identified by state/local judges, law enforcement, and prosecutors.
- Directorate would:
  - Receive applications – one mailroom nationally;<sup>12</sup>
  - Handle safe addresses;
  - Be the contact center for victims' cases;
  - Have its own help line for victims' attorneys/advocates;
  - Have its own help line for certifiers;
  - Ensure Section 1367 VAWA confidentiality protections compliance for all cases;
    - An important component of this proposal involves extending VAWA confidentiality protections to SIJS applicants. This approach reinforces VAWA's statutory requirements that USCIS end the practice of requiring SIJS applicant children to contact their parents. USCIS should immediately by policy extend VAWA confidentiality protection to SIJS applicant children in the same manner as it provided VAWA confidentiality protection to Section 105 employment authorization and continued presence applicants.
  - Set expedited criteria (including VAWA confidentiality violations remedy) and manage expedited requests;

---

<sup>11</sup> See Attachment A – VAWA 2005 Immigration Legislative History.

<sup>12</sup> This should be located at the Vermont Service Center and should build upon the success of the VSC's VAWA Unit mail room and specially trained support staff that have for decades operated the VAWA Unit of the VSC in successful compliance with VAWA confidentiality requirements.

- Communicate/coordinate with ICE on:
  - detained cases and before issuance of NTAs if victim has pending applications for immigration relief;
- Have its own specially trained fraud unit; and
- Adjudicate:
  - Fee waivers;
  - Issuance of Employment Authorizations Documents;
  - Prima facie determinations in VAWA self-petition cases;
  - Bona fide determinations in U visa and T visa cases;
  - Deferred action;
  - Parole for applicants and their family members;
  - Lawful permanent residence applications (adjustments);
  - Conduct SAVE verification for work and benefits purposes; and
  - Conduct any interviews virtually that may be deemed by Directorate staff to be needed in any of victims related cases.

#### IV. Benefits of the Proposed Approach

- Reducing backlogs reduces the pain, ongoing abuse and danger of long waits for employment authorization – after leaving abusive and dangerous situations victims can rebuild their lives
  - Predictable times with the goal of victims receiving deferred action and employment authorization (or approval if possible depending on the case type) within 6 months of filing helps with safety planning with victims to address the dangers to victims and their children during the gap between filing and receipt of deferred action;
- Use brick and mortar location for mail room, physical storage, administrative support at the same location and with the same staff as the VAWA Unit at the VSC with 24+ years of experience;
- Supervisory chain of command are all experts on victim based immigration relief;
- All staff and supervisors receive regular up to date training including evidence-based research on victimization of immigrants;
- All VAWA confidentiality protected cases in one Directorate
  - Extend VAWA confidentiality protection to SIJS applicants;
- All staff, adjudicators, and supervisors employ victim-centered approach;
- Will improve customer service;
- Will promote consistency and eliminate attempts at re-adjudication requested by untrained field office staff conducting adjustment interviews in adjustment cases. If needed Directorate conducts its own video-facilitated interviews;
- Move adjudication of Battered Spouse Waiver cases to the specially trained team of adjudicators in the Directorate that adjudicate VAWA self-petitions;
- Will improve coordination with OPNS, CRCL and other DHS components building/attracting/keeping greater victim-based expertise in USCIS and DHS;
- Will reduce backlog while improving consistency and efficiency by:
  - Ending the practice of taking specially trained adjudicators and reassigning them to premium fee generating cases;



- Ensuring that only staff with specialized training on domestic violence, child abuse, sexual assault, stalking, human trafficking, and crime victimization adjudicate victim-based case types;
- Reducing the number of RFEs in two important ways
  - Specially trained adjudicators will recognize victimization dynamics and thus issue fewer RFEs; and
  - Potential to assign one adjudicator to all cases filed by same person which
    - Eliminates multiple RFEs;
    - Allows adjudicators to issue one RFE addressing multiple cases filed by the same victim;
    - Facilitates the approval of one of the case types filed by the victim and administrative closure of all others;
- Improving identification of patterns of fraud across all victim-based programs
  - No longer seeing fraud only within silos; and
- Keeping adjudicators from being assigned to non-victim based cases
- Improve recruitment and retention of adjudication staff:
  - Specialized team can attract people with expertise, experience, and interest on victims of crime and abuse and create opportunity for career growth within the USCIS Crime and Abuse Victim Protection Directorate
  - Adjudication staff and many of the Directorate Supervisory Staff can work remotely from anywhere in the country
  - Can specialize in one victim-based case type and have opportunity to be trained on and adjudicate victim-based case types within the Directorate
- Creating a Directorate cost neutral
  - Currently between fees not charged on victim-based case types and fee waivers granted, these cases are being adjudicated without being fee generating. That would continue with the Directorate which would have its own budget. The efficiencies created by moving all crime-victim VAWA confidentiality protected cases into one Directorate would be cost saving by reducing costs of:
    - Training staff and adjudicators;
    - Supervising staff;
    - VAWA confidentiality compliance;
    - Adjudications by reducing unnecessary RFE, VOIDs and denials issued by untrained adjudicators;
    - Customer service; and
    - SAVE Verifications.

## V. The Justice System Experience of Specialized Units

Through our partnership with state courts and judges, law enforcement and prosecutors we have learned that specialized units/courts created in the justice system lead to safer communities, better protect victims, and are more efficient in holding offenders accountable. Agencies throughout the justice system have gained expertise and training on domestic violence dynamics and developed best practices that have been funded, evaluated, and shared with other state and federal agencies. These best practices

can help USCIS improve the quality, consistency and efficiency of case processing and adjudication of humanitarian victim-based forms of immigration relief.

From the long experience and best practices used by courts, law enforcement and prosecutors' offices across the country we have learned the benefits of:

- Specialized training for judges, police and prosecutors on domestic violence, sexual assault, stalking and human trafficking and using a victim-centered approach, improves and facilitates access to justice and protection for crime victims in a manner that protects their safety and is mindful of the urgency of their need for protection.
- Having a system like the Directorate being proposed that allows supervisors to move staff between victim-based case types which helps grow adjudicators skills and understanding and helps ensure that staff do not get overwhelmed.
- Ensuring the expertise needed to detect patterns that enable adjudicators to ferret out and deny fraudulent cases while, at the same time, having the training that promotes recognition of patterns of coercive control and abusive behavior that simultaneously facilitates adjudicator ability to identify and offer swift protections to victims.
- State and federal judges, police, prosecutors, and other government agency staff knowing about the training and expertise of USCIS adjudicators that are part of a specially trained unit supervised by experts – builds trust and confidence in program.

#### VI. Supporting Documents Attached

- Attachment A: VAWA 2005 Immigration Legislative History
- Attachment B: How Training and Expertise Improve VAWA Immigration Case Processing: The Efficacy and Legislative History of the Specialized VAWA Unit
- Attachment C: Enhancing judicial skills in domestic violence cases: the development, implementation, and preliminary evaluation of a model US programme
- Attachment D: Enhancing Judicial Skills in Domestic Violence Cases - A Process and Outcome Evaluation of a National Judicial Education Program
- Attachment E: Transforming Lives: How the VAWA Self-petition and U Visa Change the Lives of Survivors and their Children After Employment Authorization and Legal Immigration Status
- Attachment F: Early Access to Work Authorization For VAWA Self-Petitioners and U Visa Applicants
- Attachment G: Moving Battered Spouse Waiver Adjudications to the VAWA Unit: A Call for Consistency and Safety National Survey Findings Highlights
- Attachment H: Report on the Operations of the Violence Against Women Act Unit at the USCIS Vermont Service Center – Report to Congress (October 22, 2010)