

The Police Chief

THE PROFESSIONAL VOICE OF LAW ENFORCEMENT

APRIL 2018

VICTIM SERVICES

2018
BUYERS'
GUIDE

Inside:

Victim & Witness Protection

**Overcoming Fear in Immigrant
Communities**

IPV Risk Assessments



IACP
International Association of
Chiefs of Police



Gene Voegtlin/Editor

Danielle Gudakunst/Managing Editor

Kristina Rose/Guest Editor

Margaret M. White/Proofreader

The Townsend Group/Advertising

Christian D. Faulkner and

Mara Johnston/Member Services

TGD Communications, Alexandria, Virginia/
Graphic Design and Production

Amanda Burstein, Sam Capogrossi,

Michael Fergus, John Firman, Sarah Guy,

Domingo Herraiz, Sarah R. Horn, Kathleen Kelley,

Karen Maline, Nicole LeFort, Cecilia Rosser,

Paul Santiago, Lynne Goto Uyema,

Erin Vermilye/Editorial Advisors

Howe & Hutton, Ltd./Legal Counsel

<http://www.policechiefmagazine.org>

© Copyright 2018, by the International Association of Chiefs of Police, Inc. Reproduction of any part of this magazine without express written permission is strictly prohibited.

The Police Chief (ISSN 0032-2571) is published monthly by the International Association of Chiefs of Police, 44 Canal Center Plaza, Suite 200, Alexandria, VA 22314-2357, USA; 703-836-6767; fax: 703-836-4543. Periodicals postage paid at Alexandria, Virginia, and additional mailing offices. Subscription rate of \$30 to IACP members is included in annual membership dues; subscription rate to nonmembers is \$30 per year, domestic and foreign. Single copy, current issue, \$2.50; back issues, \$3, except APRIL Buyers' Guide issue, \$12.50.

POSTMASTER: Send address changes to the Police Chief, 44 Canal Center Plaza, Suite 200, Alexandria, VA 22314, USA.

Canada Post: Publications Mail Agreement #40612608
Canada returns to be sent to Bleuchip International, P.O. Box 25542,
London, ON N6C 6B2

NOTE: New subscriptions and changes of address require six to eight weeks to process. Subscriptions begin with next available issue; for backdated subscriptions, place separate order for back issues desired. IACP will not be responsible for replacement of an issue if not notified of nondelivery by the 15th of the third month following the month of issue. Please check address label and promptly mail any necessary changes.

Articles are contributed by practitioners in law enforcement or related fields. Manuscripts must be original work, previously unpublished and not simultaneously submitted to another publisher. No word rate is paid or other remuneration given. Contributors' opinions and statements are not purporting to define official IACP policy or imply IACP endorsement.

Printed in the USA.

BPA business publication membership granted September 1991



Victims of crime and crime survivors come from all walks of life and all parts of the communities that law enforcement serves every day. Whether working with victims or families affected by violent crime, hate crimes, sexual assault, or a myriad of other offenses, it's key that law enforcement be prepared to offer or partner with those who offer victim support services. Likewise, law enforcement must be aware of segments of their community that might be fearful of reaching out for help—immigrants, victims of intimate partner violence, gang-affiliated individuals, and so forth—and take the initiative to build trust and relationships with them.

The Police Chief

APRIL 2018
VOLUME LXXXV, NUMBER 4

The official publication of the International Association of Chiefs of Police, Inc.

ARTICLES

- 22 Ending Violence Against Women and the Abuse of Power**
By Joe Biden
- 24 Healing the Wounds of Hatred**
By Mark Walerysiak, Jeffrey W. Cossette, and Noel C. March
- 28 Informing and Supporting Original Victims of Crime During Post-Victim Exonerations**
By Jennifer Thompson and Michael Gaudin
- 34 Overcoming Fear and Building Trust with Immigrant Communities and Crime Victims**
By Stacey Ivie, Michael LaRiviere, Antonio Flores, Leslye E. Orloff, and Nawal H. Ammar
- 42 Protecting Victims of Intimate Partner Violence: Arizona's Emerging Risk Assessment Model**
By Neil Websdale, Jerald Monahan, and Greg Giangobbe
- 48 Collaborations in Witness Protection: Denver's Replicable Model**
By Steve Siegel, Barbara Archer, and Scott M. Snow

COLUMNS

- 6 President's Message: Protecting the Most Vulnerable in Our Communities**
By Louis M. Dekmar
- 10 Legislative Alert: IACP Meets with Senior White House Officials and U.S. Attorney General Jeff Sessions**
By Sarah Guy
- 12 Officer Safety Corner: Building Healthy and Resilient Law Enforcement Families in Bend, Oregon**
By Cory Darling
- 14 Research in Brief: The ABCs of Unintentional Discharges**
By John O'Neill, Mark E. Hartman, Dawn A. O'Neill, and William J. Lewinski
- 16 Chief's Counsel: The Whole Is Greater Than the Sum of Its Parts**
By Mark Newbold
- 52 Product Feature: Social Media: Finding What Works for You**
By Scott Harris
- 96 Technology Talk: Eight Tips for Designing and Using Smart ID Cards for Police Officers**
By David Allen and David Finkelstein
- 100 Traffic Safety Initiatives: Using Data to Drive Resource Allocation**
By Jana R. Simpler
- 102 IACP Working for You: Professional Services to Advance Law Enforcement**
By Carl Maupin

1996

IACP THROUGH THE YEARS

76 Youth Violence in America: Recommendations from the IACP Summit

2018 BUYERS' GUIDE

- 57 Information
- 58 Category Listings
- 60 Using the Buyers' Guide
- 61 Directory
- 71 Products and Services

DEPARTMENTS

- 8 The Dispatch**
- 84 New Members**
- 91 Line of Duty Deaths**
- 94 Product Update**
- 104 Index to Advertisers**

Overcoming Fear and Building Trust with Immigrant Communities and Crime Victims

By Stacey Ivie, Detective, Alexandria, Virginia, Police Department; Michael LaRiviere, Investigator, Salem, Massachusetts, Police Department; Antonio Flores, Sergeant Inspector, San Francisco, California, Police Department; Leslye E. Orloff, Director, NIWAP, American University Washington College of Law; and Nawal H. Ammar, Dean, College of Humanities and Social Sciences, Rowan University

One of the most intimidating tools abusers and traffickers of undocumented immigrants use is the threat of deportation. Abusers and other criminals use it to maintain control over their victims and to prevent them from reporting crimes to the police.¹ However, to combat this problem, the U.S. Congress created two powerful tools designed to help law enforcement agencies detect, investigate, and prosecute crimes committed against immigrant crime victims: the U and T Visas. These visas were included in the Violence Against Women Act (VAWA) and the Trafficking Victims Protection Act (TVPA). The two acts are “important bipartisan pieces of legislation that together advance the cause of justice for crime victims and truly offer the prospect of improving public safety.”²

The U and T visas offer protection against deportation and a path to legal immigration status for undocumented immigrant crime victims who have assisted or are assisting law enforcement officials in the detection, investigation, or prosecution of certain criminal activities. The U and T visas cover victims of violent crimes, particularly of crimes with high recidivism rates. Domestic violence, sexual assault, incest, child sexual abuse, and human trafficking make up 76 percent of the U visas cases filed in the United States.³ Severing perpetrator’s control over victims is a central goal of the U and T visa statutes. Members of the U.S. Congress had “heard horrific stories of violence in cases where the threat of deportation was used against spouses and children—‘If you leave me, I’ll report you to the immigration authorities, and you’ll never see the children again.’”⁴

Chief Pete Helein (retired) of the Appleton, Wisconsin, Police Department, in a 2011 U.S. Congressional Briefing described the U visa as

an invaluable vehicle to work closely with victims to prevent crime, save lives, and hold violent offenders accountable—strategies consistent with the philosophy of community policing.

The U visa should be considered a “crime-fighting tool” because it improves law enforcement’s ability to detect, investigate, and prosecute criminal offenders. The strategy acts as a catalyst to reduce crime. Reduced crime rates are met with reduced costs to police departments and to communities. More importantly, U visas help save lives by empowering crime victims to identify violent criminals. Among the lives saved are the lives of the men and women of law enforcement who are in harm’s way when they repeatedly respond to violent crimes committed by the same offender.⁵

In times of increased immigration enforcement in the United States, perpetrators’ threats to report their victims’ immigration statuses to authorities are effective tools that stop victims from providing information to and cooperating with law enforcement officials. The U and T visas can be used to help U.S. law enforcement agencies build trust and fortify relationships with limited English proficient (LEP) and undocumented immigrant communities. U and

T visa certification can be effectively employed to lessen immigrant victims’ fear of law enforcement by demonstrating the law enforcement agencies’ commitment to serving and protecting victims of crimes in immigrant communities. By implementing practices and policies promoting U and T visa certification and providing meaningful language access to LEP individuals, law enforcement agencies can turn fragile relationships with immigrant communities into resilient ones.

The U and T Visa Programs

Immigrant populations are more vulnerable to criminal activities such as domestic violence, sexual assault, and human trafficking. However, many victims are hesitant to approach or cooperate with law enforcement because of factors such as language barriers and fears of deportation. The U.S. Congress created the U and T visas to encourage the cooperation of immigrant victims of crime with law enforcement agencies. U and T visas ensure that law enforcement can effectively investigate and assist immigrant victims of serious crimes, especially those who do not have legal status in the United States, without the risk that these immigrant victims would face deportation. According to the U.S. Department of Homeland Security (DHS), in establishing these visas,

Congress sought not only to prosecute perpetrators of crimes committed against immigrants, but to also strengthen relations between law enforcement and immigrant communities.⁶

The U visa is a form of immigration relief available to direct or indirect victims of certain qualifying criminal activities who

- have information about the criminal activity;
- were helpful, are currently helpful, or are likely to be helpful in the detection, investigation, prosecution, conviction, or sentencing of criminal activity; and
- have suffered substantial physical or mental abuse as a result of the criminal activity.

The U visa covers 26 types of criminal activities including domestic violence, sexual assault, human trafficking, felonious assault, and kidnapping.

The T visa is a form of immigration relief available to victims of severe forms of human trafficking (including sex or labor trafficking) who

- are currently in the United States, or at a port of entry due to the trafficking;
- have complied with reasonable requests from law enforcement for assistance in the investigation of the trafficking; and
- would suffer extreme hardship and unusual and severe harm if removed from the United States.

A victim applying for the U or T visa has an ongoing responsibility to cooperate with law enforcement when it is reasonable to do so.

The first step in applying for a U visa requires the immigrant victim to obtain a signed U visa certification form (I-918b) from a certifying official. Among the primary agencies able to certify U visa applications are law enforcement organizations. By signing a U visa certification, the official is simply stating that the

- applicant was a victim of a qualifying criminal activity;
- criminal activity occurred in the United States; and
- applicant has been helpful, is being helpful, or is likely to be helpful in the detection, investigation, prosecution, conviction, or sentencing of the criminal activity.

This certification does not confer immigration status or provide benefits to the victim. Only DHS can make determinations of U visa eligibility.

2017 Survey Results

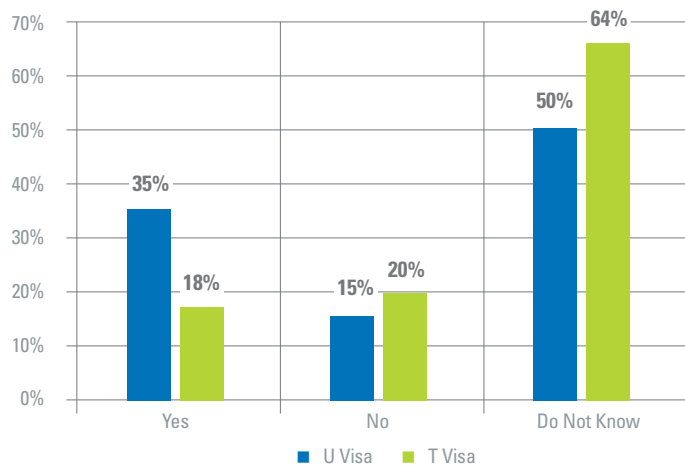
The National Immigrant Women’s Advocacy Project (NIWAP), American University, Washington College of Law conducted a survey of 232 law enforcement officials in 24 states during November and December 2017. The survey’s aim was to explore whether law enforcement officials are seeing changes in immigrant victim cooperation and willingness to report crimes or any a change in law enforcement’s ability to investigate crimes involving immigrant victims in 2017 compared to 2016. Most police officials (86 percent), regardless of rank, unit assignment, or community population size, reported that they encounter LEP victims who require services of an interpreter living in their jurisdictions. Law enforcement officials participating in the survey routinely worked with LEP victims who spoke a wide variety of languages including, most prominently and in order of most to least spoken, Spanish, Korean, Arabic, Vietnamese, Chinese, and Urdu.⁷

Officials were asked whether their agency was signing U and T visa certifications. Their responses are documented in Figure 1.

When asked to compare immigrant victims’ willingness to cooperate in 2017 relative to 2016, police officials reported some decline in immigrant and LEP victims’ willingness to cooperate with law enforcement. As shown in Figure 2, officers reporting reductions in 2017 identified the following areas where immigrant and LEP victims were less willing to seek assistance or cooperate with the justice system: making police reports, cooperating with crime scene and post-crime scene investigations, and working with prosecutors.

The survey sought more detailed information about the reasons immigrant and LEP victims provide to law enforcement officials for their noncooperation. As shown in Figure 3, a variety of concerns were given most often as explanations for noncooperation, including fear of retaliation against the victim or the family and fear of being reported to immigration officials or deported.

Figure 1: Signing Certifications in Percentages



Additionally, the survey showed that police officers are facing increased challenges in investigating crimes involving immigrant and LEP victims in 2017 relative to 2016. A significant percentage (42 percent) of U.S. law enforcement officials felt federal immigration enforcement practices were affecting community-police relationships with immigrant and LEP communities. A large proportion of law enforcement officials taking the survey reported that some crimes involving immigrant and LEP victims were becoming harder to investigate in 2017 compared to 2016, including domestic violence, human trafficking, sexual assault, child abuse, extortion or blackmail, elder abuse, and felonious assaults, as shown in Figure 4.

Importantly, almost 52 percent of law enforcement officials participating in the survey reported that barriers facing LEP and immigrant victims resulted in greater numbers of perpetrators at large in their communities. Survey participants provided more detail on the impact of this when asked whether the barriers affecting immigrant and LEP victims had adverse effects. A significant number of those participating in the survey reported an adverse impact on their abilities to hold perpetrators accountable, protect crime victims, and maintain community and officer safety (see Figure 5).

Importance of the Findings for Law Enforcement Agencies

These survey results showed that approximately 20 percent of survey participant officers were seeing a reduction in immigrant and LEP crime victims’ willingness to provide information to officers at the crime scenes, to make police reports, or to participate in post-crime scene investigative interviews. Greater numbers of law enforcement officials reported that crimes involving immigrant crime victims were becoming harder to investigate and prosecute in 2017 compared with 2016. Officers participating in the survey report that victims’ fears of deportation, perpetrators’ deportation threats, and fears that police will turn in undocumented victims for immigration enforcement play a key role in victims’ reticence to cooperate with law enforcement. These survey results confirm what law enforcement U visa trainers across the United States are observing in the field. These impacts appear to be lessened in communities where law enforcement has dedicated efforts to establish trust with immigrant communities.

When community members, regardless of status, choose silence over cooperation, there is a reduction in reports of criminal offenses. The chain reaction caused by this reticence can be explosive. Without reporting of criminal activity, there will be a decrease in detection and prevention of crimes in communities. When immigrant and LEP victims are able to report crimes without fear of deportation, law enforcement is able to obtain the necessary information to identify, track, and hold more violent offenders accountable. The underreporting

Figure 2: Areas of Immigrant & LEP Victims’ Reduced Willingness to Seek Assistance From Law Enforcement

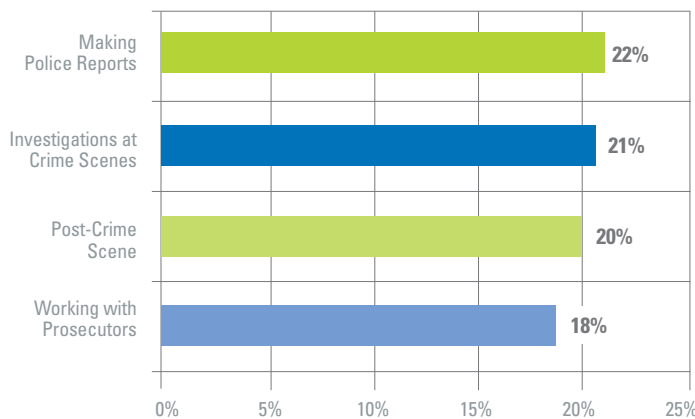
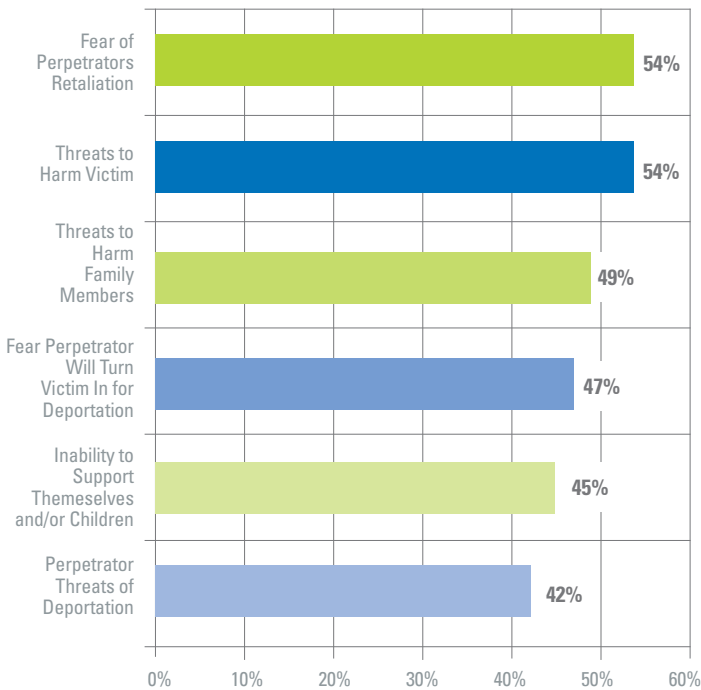


Figure 3: Immigrant and LEP Victims' Reasons for Noncooperation



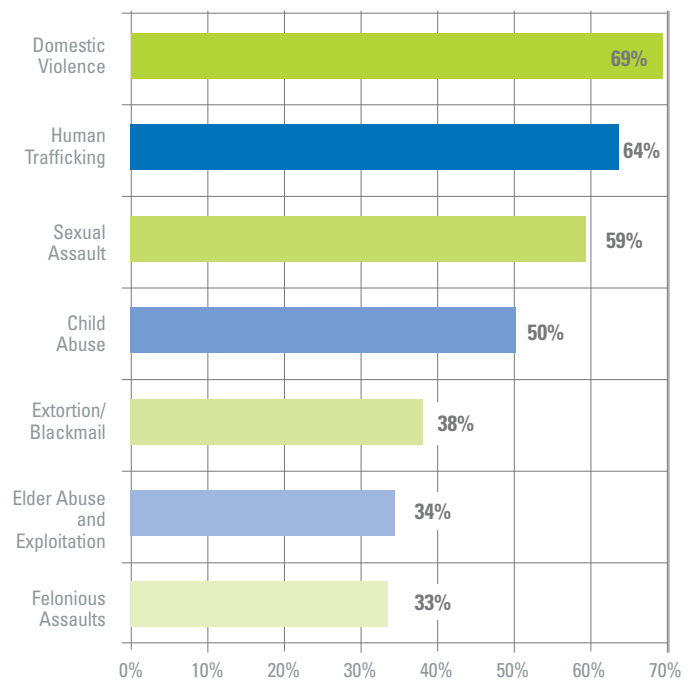
of crimes results in increased risks both to victims and law enforcement personnel. It also impacts the accuracy of law enforcement data, which, in turn, impacts planning, training, and resource allocation needed to effectively combat crime.⁸ Without crucial intelligence produced by community collaboration with all sectors of the community, including immigrants and LEP victims, criminal acts will continue and will likely increase against all community members. The victimization of one person affects the community as a whole.

The implementation of U and T visa certification programs is a necessary component of an effective community policing strategy that builds trust and develops strong working relationships with immigrant and LEP crime victims and immigrant communities. Building trust, breaking the barriers, and initiating basic criminal investigations can reveal other crimes and identify dangerous offenders in the community.⁹

Since the time U and T visa programs were fully implemented by DHS over a decade ago, law enforcement agencies across the United States have found U and T visa certifications to be effective tools for fighting crime while also building trust with immigrant crime victims and immigrant communities by removing the fear of deportation as an obstacle to cooperation. NIWAP's research found that that, of the participating law enforcement agencies, 35 percent had active U visa certification practices and 17 percent had active T visa certification practices. However, significant percentages of law enforcement survey participants did not know whether their agency was signing certifications in either U visa (50 percent) or T visa (64 percent) cases.

Knowledge about the U and T visa programs helps officers fulfill their oath to protect and serve their communities while simultaneously protecting officer safety. By implementing U and T visa certification practices and adopting protocols for these certifications, law enforcement agencies demonstrate to the community that they are receptive to and interested in protecting and serving immigrant and LEP community members. Building relationships of trust with immigrant and LEP communities brings with it the ability to hold perpetrators in those communities accountable and simultaneously enhances the ability of law enforcement agencies to preserve officer safety.

Figure 4: Top Crimes Harder to Investigation Due to Noncooperation with Law Enforcement

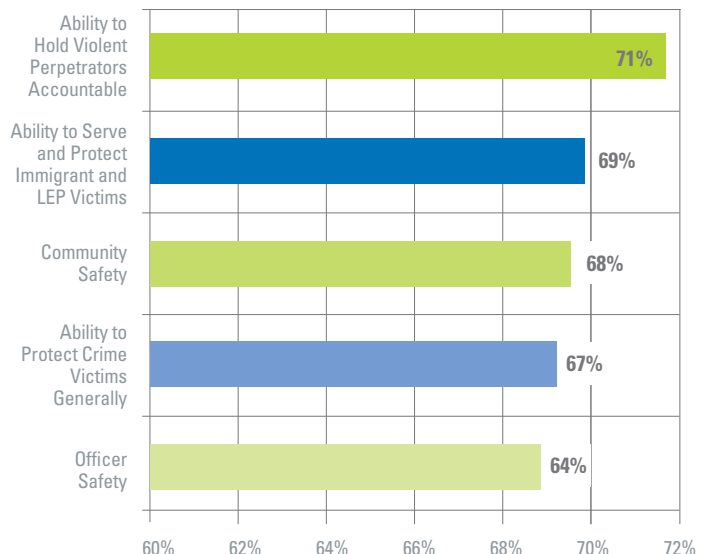


The value of the U and T visa programs as effective community oriented policing strategies has been well established.

FBI Law Enforcement Bulletin (2009) described the benefits of the U visa for both victims and officers to law enforcement units:

Law enforcement personnel strive for strong connections with all citizens. In pursuit of this goal, striking an appropriate balance—one that punishes wrongdoers while protecting victims—can present a challenge. One way that officers not only can foster better relationships with immigrant communities but also increase offender accountability, promote public safety, and help ensure that crimes translate

Figure 5: Adverse Impact of Noncooperation of Immigrant and LEP Victims with Law Enforcement



“Crime should be considered a community issue, requiring a community response based on mutual trust. People solve crimes when they share information with law enforcement. However, to share information you must be able to trust law enforcement officers. People trust law enforcement officers when they feel safe and are treated with dignity and respect, fundamental principles of Community Policing.

The fear of deportation can no longer be used to control the lives of immigrant women and children. Law enforcement officers must exercise due diligence and work hard to forge relationships based on trust. Increased crime reporting rates leads to increased arrest and prosecution rates thus resulting in an improved quality of life for everyone.

I consider meeting the cap of 10,000 U-visas as confirmation that 10,000 violent criminal offenders, living in neighborhoods throughout our country, were identified by courageous immigrant crime victims. I strongly urge you and other policymakers to recognize U-visas as crime fighting tools.”

—Chief Pete Helein,
Appleton, Wisconsin, Police Department

“Statement in Support of U-Visas,
T-Visas, and VAWA, Self-Petitions”

November 9, 2011



into convictions is to promote awareness of the U visa, which provides important immigration benefits to cooperating crime victims.¹⁰

Department of Justice, COPS Office (2011) promoted the U visa as an important tool for community policing, explaining that the U visa “has been developed to help police build a bridge to the neighborhoods they serve and solve crimes.”¹¹ A 2011 article on the topic highlights the Bureau of Justice Assistance–funded training curriculum and U Visa Toolkit for Law Enforcement Agencies and Prosecutors that were developed in collaboration with 13 law enforcement agencies.¹²

The Police Executive Research Forum (2017) conducted research and issued an article, “U Visas and the Role of Local Police in Preventing and Investigating Crimes Against Immigrants,” that identifies promising practices employed by law enforcement agencies across the United States and highlighting the successes, lessons learned, and benefits for law enforcement and the community of the San Francisco, California, Police Department’s decade-long U visa certification program.¹³

Recommendations for Best Practices

U and T visa certification programs that include training and supportive agency policies are important crime-fighting tools that build trust and legitimacy with immigrant and LEP communities, reduce crime, and promote officer wellness and safety. The following four steps are recommended for successfully implementing a U and T visa certification program:

1. Initiate U and T visa certification practices.

Law enforcement agencies can begin issuing U visa and T visa certifications signed by the chief executive or by agency staff designated by the chief executive. According to DHS, designation can be accomplished through the chief executive signing a letter listing the law enforcement agency officials whom he or she designates to be certifiers for the agency. These officials are required by DHS regulations to have supervisory responsibility.¹⁴

SUCCESS STORY

U and T Visa Certifications Reduce Crime and Protect Victims

By implementing U and T visa policies and meaningful language access procedures, lives can be saved and dangerous violent offenders can be identified and held accountable. A case from Salem, Massachusetts, provides a good example of how an otherwise unknown dangerous domestic violence offender was identified and subsequently convicted of his crimes, which were reported to the police department by an undocumented victim.

The victim, who was pregnant at the time of the initial report, and her children endured years of abuse at the hands of the offender. He took possession of the victim and her children’s documents and repeatedly threatened to have her deported if any of them reported the abuse to the police. The victim suffered from severe domestic violence including strangulation and sexual assault, and the minor children were physically abused.

On the night of the initial report to the police department, the victim was very reluctant to speak with officers due to her fear of being deported and separated from her children. The responding officers recognized her fear and made it clear

to the victim that her status was of no concern to them. This enabled them to investigate the crimes against her and her children that had occurred that evening. A subsequent follow-up interview by the department’s victim services officer with the assistance of a qualified interpreter revealed numerous other felonies committed by the offender.

A U visa certification was signed by the department’s certifying official while the case was progressing through the courts. The victim continued to assist in the investigation and prosecution of the case, reporting a protection order violation that occurred well after the initial response and subsequent investigation. The crimes reported the evening of the victim’s first call to police resulted in the offender being convicted of domestic assault and battery on a pregnant person and domestic assault and battery on a minor child. In addition, the victim’s ongoing cooperation with the victim services officer led to convictions for strangulation, violation of an abuse prevention order, and three counts of intimidation of a witness. The offender was sentenced to 24 months in prison, and the court order imposed numerous conditions that become effective upon his release.

U and T Visas Enhance Officer Safety

During a U visa law enforcement training conducted on the outskirts of a major metropolitan area, an officer shared an experience he had with an undocumented victim of crime. The officer and his partner, who worked in his agency's gang task force unit had infiltrated one of the most violent gangs in the area. At the same time, the agency's domestic violence unit was working with an undocumented domestic violence victim who happened to be the girlfriend of one of the leaders of the gang the officers were investigating. The domestic violence unit had signed a U visa certification for the victim, and the victim had a pending U visa application. The trust built between the victim and the domestic violence investigators in this case led to a call from the victim informing police when she overheard that the gang had identified that law enforcement officers had infiltrated the gang and were planning to kill the two gang unit officers. The immigrant victim called the domestic violence investigators she had been working with and reported what she had heard. The agency's attention to immigrant crime victims and their knowledge of the U visa process saved the lives of the two gang unit undercover officers.

2. Adopt a U and T visa certification policy and language access plan.

Policies play an important role in raising awareness among law enforcement agency officials about the U and T visa programs, as well as promoting certification practices that follow DHS regulations and guidance on U and T visa certification and consistency in certifications issued. Policies also serve as an important tool for developing relationships with the immigrant community and programs serving immigrant crime victims.¹⁵

3. Train law enforcement agency staff on U and T visa certification.

Training for all ranks of law enforcement officials is critical for ensuring proper response to immigrant crime victims. Frontline officers need awareness and understanding to allow for proper identification and investigation; mid-level supervisors and specialized investigators, including certifying officials, need knowledge of the procedures and requirements to ensure proper response to requests for assistance from undocumented victims of crime; and law enforcement leaders can use the knowledge to ensure proper agency policies, procedures, and response.¹⁶

4. Receive technical assistance from law enforcement and national experts.

Numerous training opportunities exist, including free and low-cost training on best practices and model policies for U visa certification provided by a law enforcement team of U visa experts. Peer-to-peer technical assistance for law enforcement is offered through law enforcement and prosecutor roundtables and through assistance with issues that arise in individual cases involving immigrant and LEP crime victims.¹⁷

Conclusion

NIWAP's survey and research reveal that increased immigration enforcement and crime victims' fears of deportation are making crimes committed against immigrant and LEP victims more difficult

to detect and investigate. Developing and implementing U and T visa certification programs helps law enforcement agencies build and maintain the trust needed to promote the safety of crime victims, communities, and officers. Additionally, law enforcement agencies have a responsibility to provide meaningful access to LEP individuals. This access, implemented through language access policies, both meets Title VI requirements and increases law enforcements' ability to take accurate statements, increasing officer safety, community safety, and offender accountability. ❖

Notes:

¹Violence Against Women Reauthorization Act of 2005 Pub. L. No. 109-233. 119 Stat. 2960 (2005).

²Victims of Trafficking and Violence Protection Act of 2000, H.R. Rep. No. 106-939, pt. 15 (2000) (Conf. Rep.) (statement of Rep. Hyde).

³Leslye Orloff and Paige Feldman, "National Survey on Types of Criminal Activities Experienced By U-Visa Recipients," National Immigrant Women's Advocacy Project (NIWAP), 2011, <http://niwap.library.wcl.american.edu/pubs/u-visa-criminal-activities-survey>.

⁴151 Cong. Rec. S6231-2 (daily ed, June 8, 2005) (statement of Sen. Kennedy).

⁵Pete Helein, "Statement in Support of U-Visas, T-Visas, and VAWA Self-Petitions," 2011, <http://library.niwap.org/wp-content/uploads/2015/IMM-Qref-HeleinUTVisa.VAWAStatement.pdf>.

⁶U.S. Department of Homeland Security (DHS), *U and T Visa Law Enforcement Resource Guide* (Washington, DC: DHS, 2015): 4, https://www.dhs.gov/sites/default/files/publications/U-and-T-Visa-Law-Enforcement-Resource%20Guide_1.4.16.pdf.

⁷Article forthcoming, 2018.

⁸Rick Oltman, "Underreporting of Crime," *Social Contract Journal* 21, no. 4 (Summer 2011).

⁹NIWAP, *Report: The Importance of the U-visa as a Crime-Fighting Tool for Law Enforcement Officials—Views from Around the Country*, 2012, <http://niwaplibrary.wcl.american.edu/pubs/uvisa-crime-fighting-tool>.

¹⁰Stacey Ivie and Natalie Nanasi, "The U Visa: An Effective Resource for Law Enforcement," *FBI Law Enforcement Bulletin* 78 (2009): 10.

¹¹Tony Flores and Rodolfo Estrada, "The U-Visa: An Important Tool for Community Policing," *Community Policing Dispatch* 4, no. 1 (January 2011).

¹²Tony Flores and Rodolfo Estrada, "The U-Visa"; Leslye Orloff et al., *U Visa Toolkit for Law Enforcement Agencies and Prosecutors* (Washington, DC: NIWAP, 2017), <http://niwaplibrary.wcl.american.edu/pubs/uvisa-toolkit-police-prosecutors>.

¹³Police Executive Research Forum, "U Visas and the Role of Local Police in Preventing and Investigating Crimes Against Immigrants," *Subject to Debate* 31, no. 2 (June–August 2017), 1–15.

¹⁴DHS, Interim Rule, New Classifications for Victims of Criminal Activity; Eligibility for "U" Nonimmigrant Status, 179 Fed. Reg. 53023 (September 2007).

¹⁵DHS, *U and T Visa Law Enforcement Resource Guide*. See the National Model U and T Visa Certification Policies Polices developed in collaboration with law enforcement agencies with significant certification experience: NIWAP, *Model Policy for Interactions with Immigrant Victims of Crime and Human Trafficking & Signing of U Visa Certifications and T Visa Declarations*, 2016, <http://niwaplibrary.wcl.american.edu/pubs/proposed-model-u-visa-policy>; NIWAP, *Discussion Paper for Model Policy for Working with Immigrant Victims of Crime and Human Trafficking & Signing of U Visa Certification and T Visa Declarations*, 2016, <http://niwaplibrary.wcl.american.edu/pubs/discussion-paper-model-policy-u-visa-certification-may-2016>.

¹⁶NIWAP, "We Can Offer Training and Technical Assistance in Your Jurisdiction," 2017, <http://niwaplibrary.wcl.american.edu/pubs/u-visa-flyer-law-enforcement>.

¹⁷NIWAP, "We Can Offer Training and Technical Assistance in Your Jurisdiction."