Office of the Citizenship and Immigration Services Ombudsman U.S. Department of Homeland Security Mail Stop 0180 Washington, DC 20528-0180



#### Follow-Up Questions and Answers

## The CIS Ombudsman's Webinar Series: USCIS Online Accounts for Attorneys and Legal Representatives

On August 16, 2022, the CIS Ombudsman and USCIS hosted a joint webinar that covered the USCIS Online Account for Attorneys and Legal Representatives. Below are questions that were received from stakeholders during the webinar and USCIS' responses to those questions.

- Q1. Attorneys and accredited representatives can receive receipt notices, requests for evidence (RFEs) and other documents at their online account. Will the same receipt notices, RFEs, and other documents be mailed to the attorney? Most attorneys and law firms are still accustomed to and prefer to receiving notices in mail.
- A1. With the exception of Form I-539, *Application to Extend/Change Nonimmigrant Status*, USCIS continues to mail paper notices to attorneys of record and their clients *and* posts electronic copies of the notices to their respective USCIS online accounts.

For Form I-539, USCIS mails the final approval notice if the case is approved and posts all notices to the applicant's online account in electronic form.

- Q2. Thank you for clarifying that the linking paper cases feature only works at account creation. Why does the system have that limitation? Does USCIS have any plans to allow users to link paper cases after account creation?
- A2. We are working to improve the overall functionality of representative accounts. We will continue to keep the legal community informed about account updates.
- Q3. After creating my online account, I have been filing Forms N-400, *Applications for Naturalization*, by mail using the same online account number that matches my online account. However, USCIS sends me new (different) online account numbers after filing every Form N-400. How do I solve this issue?
- A3. When a legal representative submits a paper case and paper Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*, USCIS sends an Account Access Notice when the system cannot match the incoming paper Form G-28 to an existing account profile. Our

system attempts to match the incoming Form G-28 to an existing account based on the online account number, representative first and last name, address (all fields), bar number, and jurisdiction, if applicable. If the incoming paper Form G-28 does not identically match an existing account profile, the system automatically creates a new account for that case. In the situation posed here, there are likely small differences between the incoming paper Form G-28 and the legal representative's account profile. This is why we stressed the importance of submitting consistent Forms G-28 during the engagement. However, USCIS continues to explore possible modifications to the matching criteria to accurately increase the match rate between an incoming paper Form G-28 and an existing account profile.

- Q4. I understand that you cannot link paper cases to your account after account creation. To get around this, can you delete your current account and create a new account, so that you have the ability to link to paper cases in the future?
- A4. Attorneys and legal representatives can only delete their online account if they have not created a profile, have no pending cases, and have no data in their account. At this time, we do not accept the linking of paper cases on a rolling basis; we continue to work to improve the overall functionality of representative accounts.
- Q5. How do you find your USCIS online account number?
- A5. Your USCIS online account number is located in your account profile.
- Q6. What can you do when you are locked out of your online account to regain access?
- A6. For technical support, such as account lockout, you may send us a message using our webform: <a href="https://my.uscis.gov/account/v1/needhelp">https://my.uscis.gov/account/v1/needhelp</a>.
- Q7. If a legal representative leaves the organization, how should that representative's account be deleted, or can it be transferred to someone else from the organization?
- A7. You can delete your account if you have not created a profile, have no pending cases, and there is no data in your account. USCIS online accounts belong to the account owner and cannot be transferred from one person to another.
- Q8. How do you remove a client from a legal representative's online account? For example, a naturalization client who has been approved and received their certificate.
- A8. You can remove a client from a representative account if you have not submitted a form for that client. Once a form is submitted for a client, you will not be able to remove the client, even if the case is adjudicated or you withdraw your Form G-28. We are exploring adding functionality to help legal representatives manage their online account, such as an archive folder for cases that have been decided.

## Q9. How can we receive automated email notifications for case status just like our clients receive? It is very frustrating for our clients to know what is going on with their case before their legal rep knows and provides a poor client-attorney experience.

A9. At this time, we do not offer case status notifications for attorneys and legal representatives. During usability testing, we received input from members of the legal community that the alerts we send to applicants, which do not include case-specific information, would be of little value. You may proactively check the case status of your clients' cases from within your USCIS online account by searching or filtering by form or alert type.

# Q10. What fields on the Form G-28 are the ones that must match for accredited representatives? Will it be an issue that the Department of Justice (DOJ) accreditation date will change every three years?

A10. The data fields that must match exactly, for every Form G-28 are:

- USCIS online account number
- Family name (last name)
- Given name (first name)
- Street number
- Apt., suite, or floor (if any provided on the first G-28)
- City or town, state, ZIP code, country (USA)
- Licensing authority, and
- Bar number.

The DOJ accreditation date has no impact on the identity resolution process. Please consult the DOJ's <u>Recognition and Accreditation (R&A) Program</u> web page for additional details about their requirements.

### Q11. How can we view the Form G-28 on file with USCIS so we can verify that all characters are the same?

A11. For online-filed Forms G-28, sign in to your USCIS online account and choose any submitted case. On the top of that client's case card, you will see a dropdown under "pdf." There you can choose to view the PDF of the completed form for that client and/or the associated Form G-28. For paper-filed Forms G-28, refer to your records for a copy of the form that you submitted by mail.

## Q12. When filling out a Form G-28, what happens if you have more than one attorney state bar membership? Should we report one or all of our bar memberships?

A12. List all bar numbers exactly the same on every Form G-28, including commas and spaces, even when you list multiple bar numbers.

Q13. Do clients always need to have their own USCIS online account as well? If yes, why do clients have to create an account if they are using an attorney? I work at a nonprofit legal services org and many of our clients do not use computers and email.

A13. The legal representative and the applicant must each have their own account. The client needs to create an account so they can review and sign the forms before the representative submits them. Access to the online account is possible from smart phones and tablets. However, if a client does not use computers or email, you and the client should coordinate to file their benefit request on paper. All forms available to file online are also available to be filed on paper, so that your client can legally sign the document.

#### **Additional Information**

USCIS is working on several initiatives to improve the attorney and accredited representative experience, including:

- Adding more robust case management functionalities to make it easier to manage client cases:
- Enabling collaboration with other account holders (for example, an attorney and paralegal relationship and/or attorney and corporate client relationship);
- Deploying a new self-service functionality within the account such as the ability to update an address on file with USCIS and submitting correspondence and related evidence; and
- Revamping the process for linking a paper-filed case to the online account to eliminate the issue of a single attorney or accredited representative having multiple USCIS online accounts.

Furthermore, USCIS is actively exploring strategies to increase the forms available for online filing and expand electronic intake channels. This may include enabling attorneys and accredited representatives to file benefit requests directly from their existing case management systems.

We will provide more information on these improvements as soon as they become available.