



Annual Report 2015

Citizenship and Immigration Services

Ombudsman

June 29, 2015



Homeland
Security

Message from the Ombudsman



The 2015 reporting period was a momentous one for immigration. On November 20, 2014, President Obama announced significant new executive actions to help fix our broken immigration system. Among the initiatives are new enforcement priorities and an expansion of programs vital to family unity. While

the executive actions are no replacement for the legislative reform our immigration system desperately needs, they will help ameliorate barriers faced by individuals and employers seeking immigration benefits and services. I am honored to serve in the Department of Homeland Security under Secretary Jeh Johnson's leadership, and I am proud of the many dedicated public servants who work tirelessly to improve our nation's immigration programs.

Although the new initiatives, known as expanded DACA and DAPA, were halted due to court orders,¹ USCIS published policy guidance and regulations to improve existing programs, including the much anticipated L-1B Specialized Knowledge draft guidance and final regulations extending work authorization to certain spouses of H-1B visa holders. The agency launched two new humanitarian programs to support family unity and help prevent travel by unaccompanied children from Central America: the Haitian Family Reunification Parole Program and the In-Country Refugee/Parole Program for Central American Minors. In response to the high number of children arriving at the Southwest border last summer, USCIS asylum officers have acted diligently to process their cases and to ensure that women and children in detention are afforded the opportunity to express a fear of returning to their home

countries and seek asylum in the United States. The agency's efforts to serve vulnerable populations and protect the integrity of our asylum system should be commended and supported.

An ambitious undertaking, the executive actions demanded the attention of USCIS Director León Rodríguez and many key leaders in the immigration service. At the same time, longstanding challenges in existing immigration programs likewise require agency attention and action. In last year's Annual Report, we discussed in detail Requests for Evidence (RFEs) that are too often vague, unduly burdensome, or unnecessary. Such RFEs continue to delay adjudications and burden applicants and petitioners, particularly in the provisional waiver program and key employment-based categories. Providing adequate notice regarding filing deficiencies is essential to the effectiveness of RFEs, but they are often general and fail to address evidence already in the record. This is especially important in cases in which customers are not afforded the option of an appeal or a motion to reopen or reconsider.

During this reporting year, my office received numerous examples of Special Immigrant Juvenile petitions in which USCIS requested a wide range of records pertaining to the underlying state court dependency order, essentially second-guessing the state court action. We believe these RFEs are inconsistent with USCIS' limited statutory "consent authority," and the agency's own training materials. I strongly encourage USCIS to engage with stakeholders serving unaccompanied children to better understand the impact of its current adjudicatory practices. In the coming weeks, we will publish formal recommendations to improve processing of petitions for Special Immigrant Juveniles.

Since December 2014, the Ombudsman's Office has worked to resolve nearly 1,500 requests for case assistance from DACA renewal applicants facing expiration of their deferred action and accompanying work authorization due to processing delays. Requests for assistance came from a young man supporting a disabled parent, a new public school teacher in the Midwest, a low-income applicant facing eviction from his apartment, and an

¹ As of the date of publication of this Report, implementation of expanded Deferred Action for Childhood Arrivals (DACA) and Deferred Action for Parents of Americans and Lawful Permanent Residents (DAPA) has been halted following a preliminary injunction. *Texas v. USA*, 15-40238 (5th Cir. May 26, 2015)(order denying stay of preliminary injunction).

expectant mother about to lose her health benefits due to the imminent loss of employment caused by delays in her DACA renewal. As is the case for many applicants facing a lapse in work authorization, processing delays threaten people's livelihoods and can disrupt their education, healthcare benefits, driving privileges, and even housing and food stability. Administrative processing delays must not undermine a program that has enabled young people—Americans in every way but on paper—to realize their full potential in our workforce and our communities.

In addition to DACA renewal delays, our office continued to receive requests for assistance from other applicants seeking to renew employment authorization. Though a small percentage of the total number processed each year, thousands of applications for employment authorization remained pending past the 90-day regulatory processing time. I urge USCIS to adopt measures that facilitate a more orderly and predictable renewal process for DACA and other employment authorization applicants. We will continue to present recommendations to help achieve these goals.

In this year's Report, we discuss again backlogs in the asylum program, the strains these place on applicants and their families, and the current efforts to address them. This Report also addresses adjudications issues in other programs for vulnerable populations, including victims of violence, and the need for a parole program for conditional U visa grantees who are often in danger in their home countries while awaiting visa availability.

In the EB-5 immigrant investor program, backlogs grew and many cases remained pending long past the 11 to 14-month processing time goals. Projects languished and job creation was stalled because of these delays.

Last year, our Annual Report highlighted the agency's accomplishments in the area of stakeholder outreach.

Public engagement should remain fundamental to developing new policy and initiatives. It is my hope that this area in which the agency has made great strides in the past will continue to be prioritized as a core function of USCIS.

At this inflection point in the history of our nation's immigration policy, I believe more than ever in the Ombudsman's statutory charge of assisting individuals and employers with problems with USCIS both through case assistance and policy recommendations. But we cannot achieve this mandate alone. Every day the Ombudsman staff works with dedicated USCIS officers from around the country to provide high-quality services for customers who may not have experienced USCIS at its best. I very much appreciate our USCIS colleagues for their collaboration in this important work.

I want to thank Secretary Johnson and Deputy Secretary Alejandro Mayorkas for their unflinching support of the Ombudsman's mission, and Director Rodriguez for his partnership in pursuing our shared goal of an immigration service built on fairness and integrity. I am also grateful for the entire team in the Ombudsman's office who honor our mission by helping individuals and employers navigate our immigration system and without whom publication of this in-depth report would not be possible.

Sincerely,



Maria M. Odom
Citizenship and Immigration Services Ombudsman

Executive Summary

The Office of the Citizenship and Immigration Services Ombudsman’s (Ombudsman) 2015 Annual Report contains:

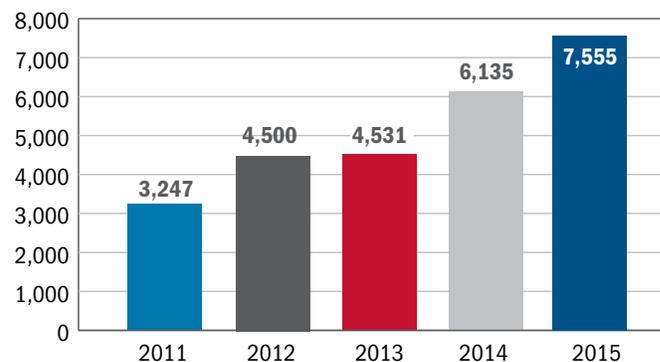
- An overview of the Ombudsman’s mission and services;
- A review of U.S. Citizenship and Immigration Services (USCIS) programmatic and policy achievements during this reporting period; and
- A detailed discussion of pervasive and serious problems, recommendations, and best practices in the family, employment and humanitarian areas, as well as in customer service.

Ombudsman’s Office Overview

In the 2015 reporting period, April 1, 2014 to March 31, 2015, the Ombudsman received 7,555 requests for assistance, an increase of over 23 percent from the 2014 reporting period. Approximately 96 percent of case assistance requests during the reporting period were received through the Ombudsman’s Online Case Assistance system. Overall, 38 percent of the requests were for humanitarian-based matters; 23 percent for family-based matters; 24 percent for employment-based matters; and 15 percent for general immigration matters, such as applications for naturalization. The Ombudsman seeks to review all incoming case assistance requests within 30 days and take action to resolve 90 percent of inquiries within 90 days of receipt. Notably, the Ombudsman received 1,151 requests for case assistance involving processing times for Deferred Action for Childhood Arrivals (DACA) renewal adjudications—approximately 15 percent of all case assistance requests handled by the Ombudsman for the reporting period. Employment authorization inquiries (not related to DACA) were the next largest source of requests for case assistance, comprising 12 percent of the Ombudsman’s casework.

Requests for Case Assistance Received by Reporting Period

(2011 to 2015)



Top Five Primary Form Types Associated with Requests for Case Assistance

FORM NAME	NUMBER	PERCENTAGE OF TOTAL RECEIPTS
I-821D, <i>Consideration of Deferred Action for Childhood Arrivals</i>	1,556	20.6%
I-765, <i>Application for Employment Authorization</i>	878	11.6%
I-130, <i>Petition for Alien Relative</i>	656	8.7%
I-485, <i>Application to Register Permanent Residence or Adjust Status (Based on an underlying humanitarian application/petition)*</i>	641	8.5%
I-485, <i>Application to Register Permanent Residence or Adjust Status (Based on an underlying employment-based immigrant petition)</i>	446	5.9%

*Underlying humanitarian petitions or applications include those for Special Immigrant Juveniles, refugees, and asylees.

The Year in Outreach

From April 2014 to March 2015, the Ombudsman conducted 84 stakeholder engagements in regions across the United States, reaching thousands of stakeholders. To inform stakeholders of new initiatives and receive feedback on a variety of topics, the Ombudsman hosted six public teleconferences in the 2015 reporting period. On November 6, 2014, the Ombudsman held its fourth Annual Conference, featuring Secretary of Homeland Security Jeh Johnson as keynote speaker as well as an “armchair” discussion with USCIS Director León Rodríguez. The Ombudsman continued to promote interagency liaison through monthly meetings with the Department of State (DOS) and USCIS on the management of the visa queues; quarterly data quality working group meetings with USCIS, U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and the DHS Office of the Chief Information Officer to facilitate problem-solving related to the Systematic Alien Verification for Entitlements (SAVE) program; and a working group with the Department of Labor (DOL), DOS, and USCIS representatives on H-2 Temporary Worker processing issues, among other interagency meetings.

DHS Blue Campaign

Ombudsman Odom serves as Chair of the Blue Campaign Steering Committee (Blue Campaign), the Department’s unified effort to combat human trafficking. The Blue Campaign brings together resources and expertise from across DHS components, while harnessing partnerships with a network of other governmental and non-governmental organizations. The Ombudsman’s Office provides subject matter expertise to the Blue Campaign and helps organize stakeholder events that address pressing trafficking and immigration issues. The Ombudsman also provides case assistance to individuals seeking to resolve problems with applications and petitions for humanitarian immigration relief, including immigrant victims of trafficking. In addition, the Ombudsman conducts regular stakeholder engagements with service providers to understand and address systemic concerns with the immigration benefits process for victims of trafficking and other crimes.

Key Developments and Areas of Focus

Executive Immigration Reform

On November 20, 2014, President Obama announced a series of executive actions to “fix our nation’s broken immigration system.” Secretary Johnson published at that same time multiple policy memoranda to implement the announced executive immigration reforms. USCIS, along with CBP and ICE, is responsible for carrying out these actions. These include new USCIS initiatives as well as new regulations and policies for enforcement, families, and businesses hiring foreign workers. Planning and implementation of these initiatives, as well as ensuing litigation, have dominated USCIS’ attention for much of the reporting period.

Families and Children

Deferred Action for Childhood Arrivals

This reporting period marks the third year of the DACA program. DACA has allowed more than 664,300 young people who were brought to the United States as children to live, study, and work legally in this country. During the reporting period, the Ombudsman received 1,151 requests for case assistance from DACA renewal applicants who temporarily lost or were on the verge of losing employment authorization. A sample of requests for assistance submitted to the Ombudsman showed the following:

- 77 percent involved the expiration of the deferred action period and employment authorization before a decision was issued; and
- Of the requests with a lapse, over 30 percent were filed timely—at least 120 days before the expiration of the initial DACA period. Another 42 percent of these requests were not timely filed, but the applications remained pending past the processing time goal of 120 days or more before a decision was issued.



The Ombudsman urges USCIS to provide for automatic temporary extension of employment authorization upon timely receipt of the DACA renewal application, or take other measures to ensure that individuals previously granted DACA do not suffer the impact of a lapse in employment authorization or accrue unlawful presence, both of which carry significant adverse consequences.

Provisional and Other Immigrant Waivers

The Provisional Waiver program helps alleviate problems of family separation and unpredictable processing times that were endemic to the prior system of overseas filing of

waivers for immigrant visa applicants. In 2012 and 2013, USCIS consolidated Form I-601, *Application for Waiver of Grounds of Inadmissibility* processing in one USCIS service center and implemented a stateside provisional waiver for immediate relatives of U.S. citizens who must consular process abroad. On November 20, 2014, Secretary Johnson published a memorandum titled *Expansion of the Provisional Waiver Program*, instructing USCIS to amend its 2013 regulation to expand the Provisional Waiver program to all statutorily eligible applicants. Requests for case assistance submitted to the Ombudsman, as well as information provided by stakeholders and USCIS during this reporting period, continue to demonstrate concerns with: summary denials in “reason to believe” cases, either on criminal, fraud, smuggling, or prior unlawful presence and reentry grounds; Requests for Evidence (RFEs) that do not assess particular evidence previously provided by the applicant; inconsistent application of the “extreme hardship” standard; and the lack of any administrative appeal or other mechanism to correct administrative error. When the regulations are revised to expand the Provisional Waiver program, pursuant to Secretary Johnson’s recent memorandum, the Ombudsman urges USCIS to afford applicants the option to file Motions to Reopen/Reconsider or an appeal.

Extreme Hardship

Secretary Johnson’s Memorandum on November 20, 2014, also directed USCIS to clarify the factors contemplated in determining whether the “extreme hardship” standard has been met, and to consider criteria by which a presumption of extreme hardship may be determined to exist such that it would provide for broader use of the waiver. These

NBC I-601A Report

(Mar. 3, 2013 to Jan. 31, 2015*)

	FY 2013 TOTAL *	FY 2014 TOTAL	FY 2015 YTD	TOTAL SINCE MARCH 3, 2013
Received	25,777	47,311	19,459	92,547
Rejected	6,363	9,125	3,042	18,530
Accepted	19,414	38,186	16,417	74,017
Approved	4,470	27,536	12,231	44,237
Denied	1,451	11,356	4,975	17,782
Administratively Closed	108	263	107	478
Pending	6	377	11,145	11,520

Source: Information provided by USCIS (Feb. 22, 2015).

changes will improve the program and assist numerous families who would have otherwise faced long periods of separation as they waited for processing of their waivers from overseas.

Military Immigration Issues

Members of Congress and U.S. military leaders have consistently emphasized to DHS that military immigration issues, including military naturalization, regularization of military dependent immigration status, and preserving military family unity are critical aspects of military readiness. The Ombudsman strongly supports USCIS efforts to assist the Armed Forces of the United States and their immigrant family members.

The Haitian Family Reunification Parole Program

On December 18, 2014, USCIS implemented the Haitian Family Reunification Parole program to expedite family reunification for certain Haitian family members of U.S. citizens and Lawful Permanent Residents and to promote a safe, legal, and orderly migration from Haiti to the United States. The program will allow eligible Haitians who are beneficiaries of an approved Form I-130, *Petition for Alien Relative* to join family members in the United States up to 2 years before their immigrant visas become available. Through this program, DHS anticipates paroling 5,000 Haitians into the United States by 2016.

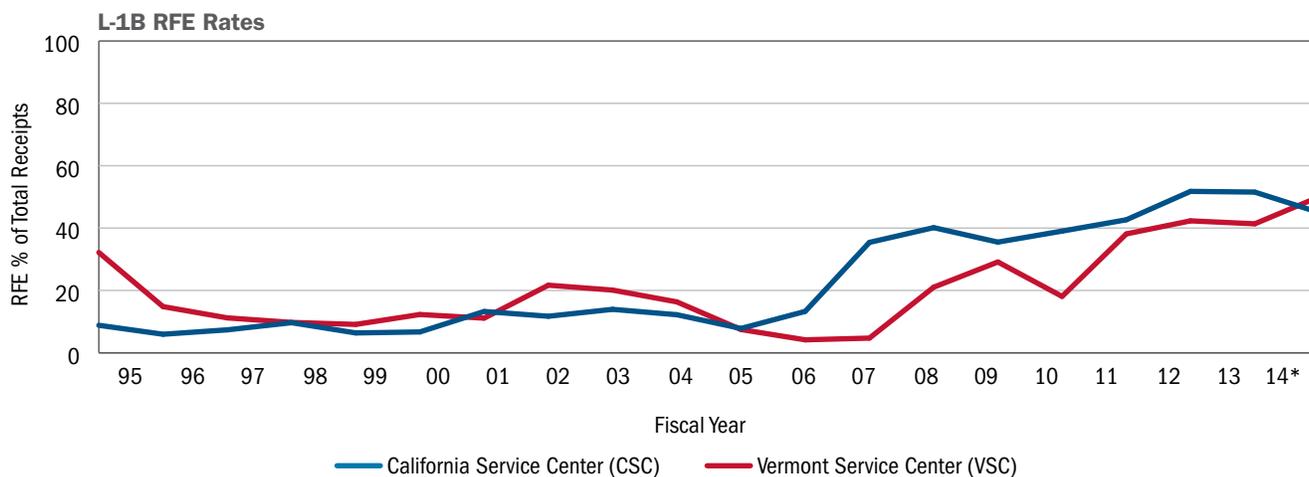
Employment

The H-2 Temporary Worker Programs

While USCIS approved over 20,000 employer petitions for H-2 workers in FY 2014, the Ombudsman continued to receive reports of processing delays in both the H-2A agricultural temporary worker and H-2B nonagricultural temporary worker programs. Such delays can have severe economic consequences for petitioning U.S. employers. From the employer’s perspective, the fact that three separate agencies govern the H-2 processes can be perplexing. These agencies—DOL, DOS, and USCIS—generally perform their individual program steps autonomously. To explore areas of collaboration in the H-2 programs, the Ombudsman convened an interagency working group, and continues to encourage coordination and more efficient practices, especially in USCIS processing.

High-Skilled Adjudication Issues

As discussed in Annual Reports since 2008, stakeholders continue to raise concerns with USCIS adjudication of nonimmigrant petitions for high-skilled beneficiaries, including H-1B (Specialty Occupations), L-1A (Intracompany Transferee Managers or Executives), L-1B (Specialized Knowledge Worker), and O-1 (Individuals with Extraordinary Ability or Achievement). Specifically, employers and their representatives provide examples to the Ombudsman of RFEs that appear to be redundant, seeking documentation that was previously provided; unnecessary, requesting information that is irrelevant or exceeds what is needed to complete the adjudication; and unduly burdensome in scope or intrusiveness. Notably, on March



Source: Information provided by USCIS (Nov. 23, 2009; Jan. 26, 2011; May 18, 2011; Apr. 4, 2013; May 29, 2014; Mar. 30, 2015).
 *FY 2014 data includes RFEs and NOIDS.

23, 2015, USCIS issued the long awaited L-1B Policy Guidance Memorandum in draft form with a scheduled implementation date of August 31, 2015.

The EB-5 Immigrant Investor Program

The EB-5 Immigrant Investor Program has surged in popularity in recent years as an effective way to attract foreign investment, to provide financing to large private and public projects, and for foreign nationals to obtain lawful permanent residency in the United States. While USCIS has hired new adjudicators and economists, it had 12,749 investor petitions (Form I-526, *Immigrant Petition by Alien Entrepreneur*) in its pending inventory as of March 31, 2015, with nearly 20 percent pending adjudication for more than a year; EB-5 processing times have been getting longer. USCIS has provided technical assistance to Congress and is actively working with other DHS and government agencies to put safeguards in place to ensure program integrity.

Seasonal Delays in Employment Authorization Processing

Eligible individuals in the United States may apply for employment authorization by filing Form I-765, *Application for Employment Authorization* with USCIS. Applicants who receive Employment Authorization Documents (EAD) are then able to commence (or resume) employment, as well as apply for Social Security Numbers and driver’s licenses. USCIS received 1,477,898 Forms I-765 in the reporting period. While the agency adjudicates the vast majority of applications for EADs within the 90-day regulatory processing timeframe, every year thousands of eligible individuals encounter processing delays. When processing of employment authorization applications is delayed, both individuals and their current or would-be employers suffer adverse consequences. Ombudsman data reveal a seasonal pattern with an increase in requests for case assistance in the summer months due to adjudications that exceed the agency’s 90-day processing requirement. This section provides suggested steps USCIS could take to address these seasonal employment authorization processing delays.

Employment-Based Immigrant Petition (Form I-140) Processing

Stakeholders continue to report concerns pertaining to USCIS’ handling of employment-based immigrant petitions. With extensive backlogs in certain employment-based preference categories due to statutory visa caps and potential changes to USCIS policies on petitioner-beneficiary rights,

it is imperative that USCIS maintain clear and consistent communication with its stakeholders. In recent months, USCIS has taken steps to review its longstanding policy on who is an “affected party” when it comes to appealing a decision of a Form I-140, *Immigrant Petition for Alien Worker*. The Ombudsman encourages USCIS to consider the significant case law and recognize legal standing for certain beneficiaries of a Form I-140 petition.

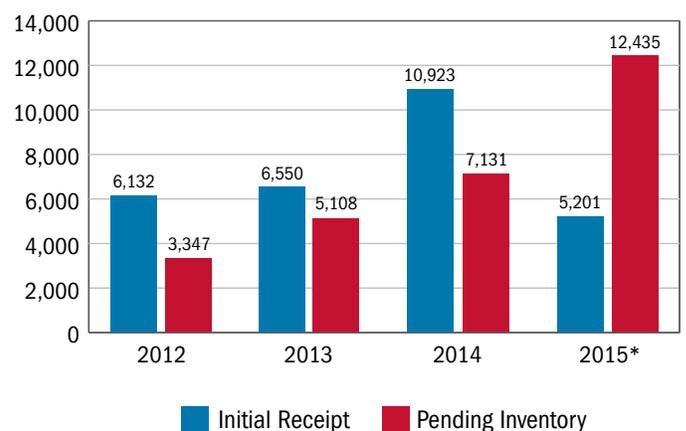
Humanitarian

Special Immigrant Juveniles

The Special Immigrant Juvenile (SIJ) program is designed to help children in the United States who have been abused, abandoned, or neglected to obtain lawful permanent residency status. The program has seen significant policy and legislative changes over the years. Stakeholders report and the Ombudsman has observed adjudication inconsistencies regarding consent requirements, age-inappropriate interviewing techniques, and delayed processing times for SIJ adjudications. USCIS continues to seek evidence underlying state court dependency orders. The Ombudsman continues to receive reports from stakeholders experiencing difficulties with pending or recently adjudicated petitions.

Form I-526 Volume and Pending Inventory at USCIS

(Oct. 1, 2012 to Mar. 30, 2015)*



Source: Information provided by USCIS (Apr. 30, 2015).



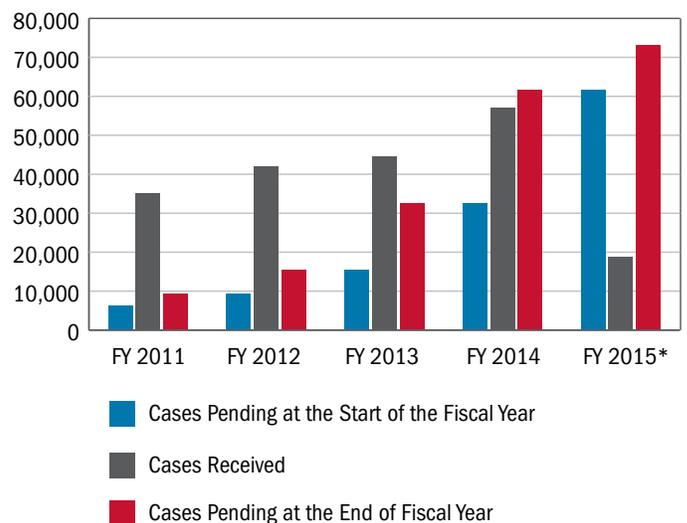
In the coming weeks, the Ombudsman intends to issue formal recommendations that USCIS: (1) centralize SIJ adjudication to improve the quality and consistency of decisions; and (2) issue updated regulations to clarify policy guidance and the limitations of USCIS’s consent authority. These steps would substantially improve adjudications and end the agency’s current practices of seeking evidence underlying state court dependency orders.

The Affirmative Asylum Backlog

A substantial backlog of affirmative asylum applications pending before USCIS has led to lengthy case processing times for tens of thousands of asylum seekers. Spikes in requests for reasonable and credible fear determinations, which have required the agency to redirect resources away from affirmative asylum adjudications, along with an uptick in new affirmative asylum filings, are largely responsible for the backlog and processing delays. Although USCIS has taken various measures to address these pending asylum cases, such as hiring additional staff, modifying scheduling priorities, and introducing new efficiencies into credible and reasonable fear adjudications, the backlog continues to mount.

Affirmative Asylum Filings

*(Oct. 1, 2010 to Dec. 31, 2014)**



Source: Information provided by USCIS (Apr. 28, 2015).

Immigration Benefits for Victims of Domestic Violence, Trafficking, and Other Violent Crimes

Victims of domestic violence, human trafficking, and other specified crimes may seek humanitarian immigration relief. Specifically, these programs include U nonimmigrant status, T nonimmigrant status, and self-petitioning for adjustment of status under the Violence Against Women Act (VAWA). The Ombudsman continues to monitor processing times, quality of RFEs and adjudications, and outreach to this vulnerable population.

Fee Waiver Processing Issues

USCIS' Office of Intake and Document Production, which supports both the Field Operations and Service Center Operations Directorates, administers the system of fee waivers for immigration applications. Fee waivers are critical to populations who cannot access immigration benefits because of their inability to afford the required fees, including elderly, indigent, or disabled applicants. This year's Report summarizes ongoing problems experienced by individuals requesting fee waivers.

Humanitarian Reinstatement for Surviving Relatives Under Immigration and Nationality Act Section 204(l) and the Regulations

For immigrant families, the death of a family member often triggers an inability of surviving family members to seek immigration status because USCIS revokes approved family-based petitions automatically upon the death of the sponsoring petitioner. Besides the avenue of relief open to widow/widowers of U.S. citizens, there are two types of remedies that may preserve the surviving relative's ability to immigrate: statutory reinstatement under the Immigration and Nationality Act (INA) section 204(l), and humanitarian reinstatement under the regulations. Stakeholders have reported to the Ombudsman, among other issues, the following: variances and long delays in the handling of INA section 204(l) and humanitarian reinstatement requests; inability to ascertain which office will take jurisdiction over such requests; difficulty determining receipt of requests by USCIS; rejection of requests by service center mailrooms; template denials; confusion between humanitarian reinstatement and INA section 204(l) requirements; and the inability of *pro se* applicants to overcome these challenges to seeking relief. These and other concerns continue in this reporting period.

In-Country Refugee/Parole Program for Central American Minors

In recent years, unprecedented numbers of unaccompanied minors from Central America have been apprehended crossing the U.S. southern border. Many of these children suffer violence and exploitation during their cross-country passage. Through the newly-established Refugee/Parole Program for Central American Minors (CAM), qualifying parents who reside in the United States and have children in Central America can petition for those children to join them stateside as refugees or parolees. This program offers vulnerable youth in this region the prospect of protection in the United States without a dangerous trek to the U.S. border.

Interagency, Process Integrity and Customer Service

Customer Service: Ensuring Proper Delivery of Notices and Documents

Every year, USCIS sends millions of notices, decisions, and documents to applicants and petitioners and their attorneys through the U.S. Postal Service (USPS). Some of these mailings inform individuals of a required next step in the application process for an immigration benefit, such as fingerprinting, an interview, or an RFE. When time sensitive notices are not received, individuals often do not take the required action, and the application or petition may be denied for abandonment. USCIS also mails decision notices and immigration documents, including EADs, Travel Documents, and Permanent Resident Cards, which when not properly delivered can leave individuals without the ability to obtain or renew their driver's licenses, apply for Social Security Numbers, start or continue employment without interruption, or travel outside of the United States. The proper delivery of documents and effectiveness of USCIS' change of address systems are thus critical.

Issues with USCIS Intake of Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative

The Ombudsman frequently hears concerns from attorneys that Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative* is not properly recorded when submitted after an application or petition has been filed with USCIS. Similarly, stakeholders bring cases to the Ombudsman's attention where notices of withdrawal of representation are not captured in USCIS systems, and attorneys continue to receive notices as the attorney of record. The Ombudsman discussed issues with rejections of Forms G-28 in the 2014 Annual Report; USCIS has yet

to implement procedures to provide notice to an applicant/petitioner or to the attorney or accredited representative upon rejection of a Form G-28. Failure to properly record the legal representative may prevent individuals and employers from receiving notice of USCIS actions or the delivery of secure documents. It raises concerns pertaining to an individual's right to counsel.

Calculating Processing Times

Both USCIS and the Ombudsman use the processing times posted on USCIS' website to manage customer inquiries and make decisions that impact customer service. When posted processing times do not accurately reflect actual processing times, those seeking immigration benefits naturally become frustrated, are unable to make personal or professional plans, and make inquiries to USCIS through the National Customer Service Center (NCSC) and at InfoPass appointments, as well as submit requests for case assistance from the Ombudsman and Congressional offices. The Ombudsman has brought these concerns to USCIS, and urges the agency

to consider new approaches to calculating case processing times that more accurately convey to individuals and employers how long a case will take to be adjudicated and where the case is within the processing queue.

Transformation: Modernizing USCIS Systems, Case Processing, and Customer Service

USCIS' effort to reengineer business processes from paper-based adjudications to an electronic environment is known as "Transformation." By March 2015, 1.1 million customers had used available Transformation processes, such as setting up user accounts, paying the immigrant visa fee, filing for immigration benefits, or tracking applications and petitions through the USCIS Electronic Immigration System (ELIS). Long before the majority of form types are scheduled to be available through Transformation, however, the agency is significantly re-designing its new system's architecture, and has just discontinued temporarily the electronic filing in USCIS ELIS of Form I-539, *Application to Extend/Change Nonimmigrant Status*, and Form I-526.



Homeland
Security

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