



Catholic Legal Immigration Network, Inc.

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Office of Policy and Strategy,  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
5900 Capital Gateway Drive  
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**RE: Form G-28 Revision “Agency Information Collection Activities; Revision of a Currently Approved Collection: Notice of Entry of Appearance as Attorney or Accredited Representative,”  
Docket ID USCIS-2008-0037, OMB Control Number 1615-0105**

The Catholic Legal Immigration Network, Inc. (CLINIC)<sup>1</sup> submits these comments regarding the U.S. Citizenship and Immigration Services’ (USCIS) proposed revisions to Form G-28. The changes represent a missed opportunity to modernize and streamline interactions between USCIS, applicants for immigration benefits, and their legal representatives. CLINIC respectfully urges USCIS to reconsider in support of the shared goals of efficiency, access to counsel, and responsible stewardship of resources.

Embracing the Gospel value of welcoming the stranger, CLINIC has promoted the dignity and protected the rights of immigrants in partnership with a dedicated network of Catholic and community legal immigration programs since its founding in 1988. CLINIC’s network, originally comprised of 17 programs, has now increased to over 400 diocesan and community-based programs in 49 states and the District of Columbia. CLINIC is the largest nationwide network of nonprofit immigration programs. Through its affiliates, CLINIC advocates for the just and humane treatment of non-citizens by increasing capacity for legal representation before immigration agencies.

All of CLINIC’s affiliate agencies are charitable and/or faith-based legal service providers, the majority of which are small organizations with fewer than six staff members. Affiliates strive to provide high-quality, low-cost legal services that are accessible to individuals and families with limited means. According to CLINIC’s 2025 Affiliate Survey Report, representatives across CLINIC’s network open approximately 13,000 affirmative cases per month, indicating a heavy reliance on Form G-28 to enter appearances on behalf of their clients. Their clients include people who live in rural and underserved areas, low-income individuals and families, and children. Efficient processes are critical to the effective stewardship of the limited resources and capacities of our affiliates, particularly in the recent context of funding cuts, staff shortages, and rapidly changing immigration policies.

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<sup>1</sup> Kathryn Hogg, Rapid Response Attorney, Allyson DiPofi, Senior Staff Attorney, Michelle Haubner, Staff Advocate, and Karen Sullivan, Director of Advocacy authored these comments. The authors would like to thank Val Christian for their contributions to this comment.

## **I. USCIS should Allow Designated Paralegals or Other Support Staff to Communicate with the Agency on Behalf of Consenting Applicants**

CLINIC encourages USCIS to implement a version of Form G-28 that would allow representatives and their clients to designate support staff to communicate with the Agency. USCIS first proposed this addition to Form G-28 in 2023.<sup>2</sup> While the [responsive comments](#)<sup>3</sup> overwhelmingly supported this change, USCIS has not yet implemented it. Legal practitioners across all fields rely on support staff for administrative tasks to augment capacity and maximize value to clients by limiting costs. It is consistent with routine business practices to rely on paralegals to upload files, review case information, and engage in routine communication with court personnel on behalf of a supervising representative and their clients. Immigration legal practitioners' inability to delegate such tasks is an anomaly in the legal field, and CLINIC welcomed USCIS' prior proposal to adjust its policies to the realities of the legal profession. In proposing now to omit this improvement, USCIS is acting against the overwhelming sentiment of previous feedback, and its own interest in promoting efficiency. CLINIC urges the Agency to reconsider.

By permitting designated paralegals and support staff to engage in limited communications with USCIS, under supervision by legal representatives and with client consent, the Agency would improve efficiency in case processing, access to counsel, and effective stewardship of both government and charitable resources. CLINIC's affiliate network includes hundreds of legal representatives – both licensed attorneys and Department of Justice (DOJ) Accredited Representatives. They manage high-volume caseloads and rely on support staff to maximize their capacity. Where legal service providers assist their clients by answering questions and streamlining communications with USCIS, they also reduce demand on USCIS contact centers. USCIS should allow representatives to delegate administrative or routine communication tasks to their trusted support staff in the interest of efficiency for all stakeholders.

## **II. USCIS Should Modernize Processes by Accepting Electronic Signatures**

CLINIC urges USCIS to accept electronic signatures in addition to manual signatures, to allow for flexibility in service delivery and to alleviate administrative burdens and barriers. The use of electronic signatures, with appropriate safeguards, is broadly accepted in banking, healthcare, and government itself. Congress has long recognized this, enacting the Electronic Signatures in Global and National Commerce Act<sup>4</sup> in 2000, which states that electronic signatures should generally be considered valid. The 21st Century Integrated Digital Experience Act,<sup>5</sup> enacted in 2018, further directed agencies to “submit to the [OMB] Director and the appropriate congressional committees a plan to accelerate the use of electronic signatures...” In a 2022 memorandum,<sup>6</sup> the Chief Information Officer of the Department of Homeland Security directed agencies to “avoid requiring customers to print out, sign, mail and/or fax an official form

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<sup>2</sup> 88 FR 48489.

<sup>3</sup> U.S. Citizenship & Immigration Servs., Responses to Public Comments on Form G-28-010 Revision, USCIS-2008-0037-0300 (July 27, 2023), <https://www.regulations.gov/document/USCIS-2008-0037-0300>.

<sup>4</sup> Electronic Signatures in Global and National Commerce Act, Pub. L. No. 106-229, 114 Stat. 464 (2000) (codified at 15 U.S.C. §§ 7001–7031), available at <https://uscode.house.gov/view.xhtml?path=/prelim@title15/chapter96&edition=prelim>.

<sup>5</sup> 21st Century Integrated Digital Experience Act, Pub. L. No. 115-336, 132 Stat. 5025 (2018), <https://www.congress.gov/115/plaws/publ336/PLAW-115publ336.pdf>.

<sup>6</sup> U.S. Dep't of Homeland Sec., Memorandum: Paperwork Reduction Act Burden Reduction Initiative (Mar. 22, 2022), [https://www.dhs.gov/sites/default/files/2022-05/Burden\\_Reduction\\_Initiative\\_Memo\\_Final%20PDF%20CIO%20signed.pdf](https://www.dhs.gov/sites/default/files/2022-05/Burden_Reduction_Initiative_Memo_Final%20PDF%20CIO%20signed.pdf).

in order to promote more equitable and efficient services to the public.”<sup>7</sup> To the extent the proposed revision nevertheless requires manual signature for Form G-28, CLINIC urges USCIS to reconsider.

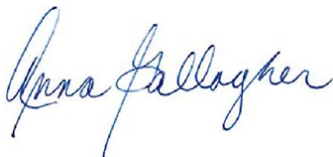
Acceptance of manual and electronic signatures would improve access to counsel and efficient case management, particularly for those served by charitable legal service providers such as those that make up CLINIC’s Network. Our Affiliates serve people who may have low income, low educational attainment, and/or those who live in rural areas. These factors contribute to the need for remote service provision, and are likely to correlate with limited access to, or facility with, technology like printers and scanners. Most people, however, have access to a smartphone.<sup>8</sup> CLINIC affiliates use a combination of paper and electronic methods to file applications with USCIS, and this flexibility allows them to effectively meet diverse client needs. While USCIS has successfully implemented online filing for many forms, that option is not universally available. Some applications cannot be filed online, including any application accompanied by form I-912, Request for Fee Waiver. Accepting electronic signatures for all filing methods would allow more flexible, efficient service provision and access to counsel. Simultaneously, the improvement would increase consistency and efficiency for USCIS’ processes, in line with Federal law and guidance.

### **III. Conclusion**

If USCIS enacts the proposed revisions to Form G-28, the Agency will miss an opportunity to alleviate administrative burdens, maximize capacity for legal service providers, and promote efficiency. CLINIC strongly recommends that USCIS reinstate previous revisions to Form G-28 to allow legal representatives and their clients to designate paralegals for communication with USCIS, and to newly amend the G-28 to accept electronic signatures. These changes would support streamlined, efficient, secure interactions between USCIS, applicants for immigration benefits, and their legal representatives. Good stewardship of limited resources is essential to CLINIC’s embrace of the Gospel value of welcoming the stranger. To this end, we share USCIS’ goals of streamlining and modernizing practices to support accurate, humane, and efficient processing of applications for immigration benefits.

Thank you for your consideration of these comments. Please do not hesitate to contact Karen Sullivan, Director of Advocacy, at [ksullivan@cliniclegal.org](mailto:ksullivan@cliniclegal.org), with any questions or concerns about our recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Anna Gallagher". The signature is fluid and cursive, with the first name "Anna" and last name "Gallagher" clearly distinguishable.

Anna Gallagher  
Executive Director

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<sup>7</sup> U.S. Dep’t of Homeland Sec., Memorandum: Paperwork Reduction Act Burden Reduction Initiative (Mar. 22, 2022), [https://www.dhs.gov/sites/default/files/2022-05/Burden\\_Reduction\\_Initiative\\_Memo\\_Final%20PDF%20CIO%20signed.pdf](https://www.dhs.gov/sites/default/files/2022-05/Burden_Reduction_Initiative_Memo_Final%20PDF%20CIO%20signed.pdf).

<sup>8</sup> Pew Research Center, Mobile Fact Sheet (Nov. 13, 2024), <https://www.pewresearch.org/internet/fact-sheet/mobile/>.