

OFFICE OF LEGAL ACCESS PROGRAMS (OLAP) RESPONSE TO CLINIC'S FOIA REQUEST

EOIR does not track the reasons for disapproval of an application for recognition or accreditation or for termination of recognition or accreditation.

- Reasons for disapproving an organization’s request for initial recognition include the organization’s inability to meet the eligibility requirements for recognition of the organization or to submit at least one approvable accreditation application.
- Reasons for disapproving an organization’s request for renewal of recognition include where the organization is unable to maintain eligibility for recognition or does not timely apply for accreditation of at least one representative when the organization had been on Inactive status. (An organization is placed on Inactive status when it loses all of its Accredited Representatives and has two years to submit an application for accreditation to return to Active status.)
- Reasons for terminating an organization’s recognition include where an organization (1) requests termination because it no longer provides immigration legal services, (2) had been in Inactive status and did not timely apply for accreditation of a representative, (3) allowed its recognition to expire and did not submit a renewal application, (4) became an extension office of another Recognized Organization, and (5) is unable to maintain its eligibility for recognition.
- Reasons for disapproving an initial accreditation application include where an organization has not established that the proposed representative meets the accreditation eligibility requirements or where the organization has simultaneously applied for initial recognition but is unable to meet the recognition eligibility requirements.
- Reasons for disapproving a renewal of accreditation include where the individual is unable to maintain eligibility for accreditation.
- Reasons for terminating a representative’s accreditation include where (1) an organization requests termination because the representative no longer provides immigration legal service, has left the organization, or has become a licensed attorney; (2) a representative’s accreditation has expired and the organization has not submitted a renewal application; (3) a representative is unable to maintain his/her eligibility for accreditation; and (4) an organization’s recognition has been terminated.

The table below reflects data for CY 2010 through May 31, 2020.

New/Initial Recognition Applications				
Year	Filed	Approved	Disapproved	Average Time (in days)
2010	135	80	29	75
2011	143	68	70	108
2012	152	91	54	90
2013	126	83	37	101
2014	200	103	65	123
2015	218	133	104	108
2016	206	136	71	101

2017	150	61	78	106
2018	170	59	100	77

Year	Filed	Approved	Avg Time (in days)	Disapproved	Avg Time (in days)
2019	139	38	119	66	100
2020	50	16	220	11	195

Renewal of Recognition Applications

Year	Filed	Approved	Disapproved	Average Time (in days)
2010	-	-	-	-
2011	-	-	-	-
2012	-	-	-	-
2013	-	-	-	-
2014	-	-	-	-
2015	-	-	-	-
2016	-	-	-	-
2017	65	33	0	73
2018	181	85	10	78

Prior to 2017, a Recognized Organization was not required to renew its recognition.

Year	Filed	Approved	Avg Time (in days)	Disapproved	Avg Time (in days)
2019	326	217	111	6	236
2020	181	75	207	2	288

Termination of Recognition Applications

Year	Terminated
2010	-
2011	-
2012	-
2013	-
2014	-
2015	-
2016	-
2017	49
2018	235
2019	62
2020	56

EOIR did not terminate an organization’s recognition between 2010 and 2016.

Initial/New Full Accreditation Applications

Year	Filed	Approved	Disapproved	Average Time (in days)	Disapproved for full but approved for partial
2010	2	1	1	55	-
2011	5	5	0	87	-
2012	48	26	8	75	-
2013	69	38	3	83	-
2014	79	37	4	82	-
2015	116	81	3	65	-
2016	110	86	2	76	-
2017	108	51	38	66	-
2018	84	36	40	71	-

Prior to 2017, if an applicant for full accreditation did not meet the eligibility requirements, EOIR did not consider the application for partial accreditation; instead, EOIR disapproved the application for full accreditation.

Year	Filed	Approved	Avg Time (in days)	Disapproved	Avg Time (in days)	Disapproved for full, but approved for partial
2019	118	41	87	23	138	9
2020	55	20	112	6	182	0

Initial/New Partial Accreditation Applications

Year	Filed	Approved	Disapproved	Average Time (in days)
2010	10	8	1	53
2011	13	7	0	105
2012	210	127	16	70
2013	287	217	25	60
2014	451	302	13	79
2015	670	578	9	66
2016	830	726	15	83
2017	560	447	58	73
2018	563	423	81	69

Year	Filed	Approved	Avg Time (in days)	Disapproved	Avg Time (in days)
2019	537	379	210	62	134
2020	212	182	113	10	191

Full Accreditation Renewal Applications

Year	Filed	Approved	Disapproved	Average Time (in days)	Filed by a partially Accredited Rep
2010	3	3	0	35	-
2011	1	1	0	36	-
2012	27	20	1	58	-
2013	53	46	1	60	-
2014	64	48	1	79	-
2015	45	58	4	74	-
2016	41	31	1	70	-
2017	35	28	0	56	-
2018	77	52	1	59	36

Year	Filed	Approved	Avg Time (in days)	Disapproved	Avg Time (in days)	Disapproved for full, but approved for partial
2019	59	39	100	0	-	2
2020	16	12	166	0	-	2

Prior to 2018, EOIR did not track the number of full renewals that an organization submitted on behalf of a partially Accredited Representative.

Partial Accreditation Renewal Applications

Year	Filed	Approved	Disapproved	Average Time (in days)
2010	5	5	0	72
2011	11	10	0	53
2012	142	106	0	64
2013	161	171	2	53
2014	183	156	3	69
2015	169	169	4	63
2016	126	142	1	65
2017	169	113	2	61
2018	262	235	3	62

Year	Filed	Approved	Avg Time (in days)	Disapproved	Avg Time (in days)
2019	300	286	79	6	154
2020	96	84	109	0	-

Full Accreditation Terminations
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Year	Terminated
2010	-
2011	-
2012	-
2013	-
2014	-
2015	-
2016	-
2017	53
2018	78
2019	46
2020	9

Prior to 2017, EOIR did not consistently track the terminations of Accredited Representatives.

Partial Accreditation Terminations

Year	Terminated
2010	-
2011	-
2012	-
2013	-
2014	-
2015	-
2016	-
2017	384
2018	421
2019	443
2020	74