



REQUEST FOR EXTENSION OF RECOGNITION OF A NON-PROFIT RELIGIOUS, CHARITABLE, SOCIAL SERVICE, OR SIMILAR ORGANIZATION

Agency recognition and staff and/or volunteer accreditation allows non-profit organizations and their non- attorney staff and/or volunteers to practice immigration law. It is an essential tool for increasing capacity to serve low-income, vulnerable immigrant populations with high quality, charitable immigration legal services. An organization with multiple office locations may want to obtain recognition for those offices so its accredited representative(s) can offer immigration legal services in those locations. If the organization has or is seeking recognition at one office location, it may request extension to additional office locations at any time if those locations meet the eligibility requirements. Otherwise, an organization may need to seek separate recognition for those office locations.

Once the organization files for an extension of recognition for its other office locations and it is approved by DOJ Office of Legal Access Programs (OLAP), the accredited representative is authorized to practice immigration law at those recognized office locations without having to file an accreditation application for each of those locations. Please refer to CLINIC's Accreditation Checklists for more information about eligibility requirements for accreditation.

ELIGIBILITY REQUIREMENTS FOR EXTENSION OF RECOGNITION

To be eligible for extension of agency recognition, the organization's additional offices or locations must:

- Demonstrate that the sub-office(s) are under the supervision and control of the main office or headquarters;
- have access to adequate legal resources; and
- Share the same funding, management, and operations as the main office.

Note: OLAP may require an organization to seek separate recognition for an office or location of the organization, for example, when a subordinate office or location has distinct operations, management structure, or funding sources from the organization's headquarters.

ELEMENTS OF THE APPLICATION

An organization may request extension of recognition to additional office locations at any time, either as part of the initial application for recognition, renewal of recognition, or any time after the organization is recognized.

If you are applying for first time recognition, or renewal of recognition make sure to review **CLINIC's REQUEST FOR NEW RECOGNITION CHECKLIST** or **REQUEST FOR RENEWAL OF RECOGNITION** to ensure you submit the required information and documentation for those applications.

- I. Cover Letter
- II. Form EOIR 31 (Request for New Recognition, Renewal of Recognition, Extension of Recognition of a Non-Profit Religious, Charitable, Social Service, or Similar Organization)

- III. A description of frequency with which the recognized organization conducts inspections of proposed extension office(s)
- IV. Proof of joint operations between the recognized organization and proposed extension offices
- V. Proof of joint management structure between the recognized organization and proposed extension office(s)
- VI. Proof of joint funding sources and financial oversight over the proposed extension office(s)
- VII. Proof of access to the same legal resources as the recognized organization

CHECKLIST FOR EACH ELEMENT OF THE APPLICATION

This checklist is current as of the publication date. It does not constitute legal advice. The laws, interpretations of the laws, forms, and policies associated with DOJ recognition and accreditation change occasionally, so please confirm that the information in this guide is still current before relying on it. Please check the DOJ/EOIR website for form versions, instructions, recent case law regarding DOJ recognition and accreditation, and other important information. The website is <https://www.justice.gov/eoir/recognition-and-accreditation-program>. We also encourage you to review the Frequently Asked Questions (FAQs) on the recognition and accreditation program which is available on the EOIR website at the same link shown above.

Additional information may be found in CLINIC's DOJ Recognition and Accreditation Toolkit at <https://cliniclegal.org/toolkits/recognition-accreditation>.

I. Cover Letter

Best Practice Tips!

- The cover letter should be clear and concise, have the correct information for OLAP, cite the correct regulations and contain a list of enclosures. Use CLINIC's sample cover letter as a guide.
- If the request for extension of recognition is included in an initial recognition application for recognition, refer to CLINIC's sample cover letter in the REQUEST FOR INITIAL RECOGNITION CHECKLIST and include the language in CLINIC's sample extension language in that cover letter.
- If the request for extension of recognition is included in a renewal of recognition application, refer to CLINIC's sample cover letter in the REQUEST FOR RENEWAL OF RECOGNITION CHECKLIST and include the language in CLINIC's sample extension language in that cover letter.
- Include a brief summary of how the organization periodically conducts inspections of offices, exercises supervision and control over its accredited representatives at those offices and locations and provides access to adequate legal resources at each such office or location.
- Include a statement that the subordinate office(s) has shared operations, management structure, and funding sources as the organization's headquarters
- Use CLINIC's sample cover letter as a guide.

II. Form EOIR-31 (Request for New Recognition, Renewal of Recognition, Extension of Recognition of a Non-Profit Religious, Charitable, Social Service, or Similar Organization)

NOTE – Effective November 3, 2023, organizations are required to use the October 2022 Revision of form EOIR-31. OLAP will return any applications submitted using prior versions of the forms.

The applicant is using the October 2022 version of form EOIR-31 (this can be verified by looking at the bottom right corner of the form.) As of the date of this check list, this is the [link](#) for the current form.

Part 1. Organization Contact Information

Best Practice Tips!

- If the organization is already recognized, make sure the organization name listed in Part 1 is the legal name of the organization and matches the DOJ [roster](#).
- Check that the name of the organization is consistent throughout the application, cover letter and supporting documents

Part 2. Type(s) of Recognition Requested

Be sure to check the box for Extension of Recognition and provide the requested information here.

Be sure to **also** select “initial recognition” or “renewal of recognition” if applicable.

Part 3. Information About Organization

(Skip – unless this is also the application for initial recognition, then see CLINIC’s REQUEST FOR NEW RECOGNITION checklist)

Part 4. Information about Organization’s Immigration Law Practice

(Skip – unless this is also the application for initial recognition or renewal of recognition, then see CLINIC’s REQUEST FOR NEW RECOGNITION or RENEWAL OF RECOGNITION checklist).

Part 5. Renewal of Recognition (Skip)

(Skip – unless this is also an application for renewal of recognition, then see CLINIC’s REQUEST FOR RENEWAL OF RECOGNITION checklist)

Part 6. Information About Organization's Accredited Representative(s)

(Skip – unless this is also the application for initial recognition or renewal of recognition, then see CLINIC’s REQUEST FOR NEW RECOGNITION or RENEWAL OF RECOGNITION checklist).

Part 7. Extension of Recognition

- The applicant entered the information about the extension office.

Best Practice Tips!

- If requesting extension to multiple offices, note “see addendum” and include the requested information on Part 7 for each office location.
 - The applicant checked **all** appropriate boxes indicating that they attached the requested documents (*see part III-VII for best practice tips for providing supporting documentation*).
 - Frequency with which Organization in Part 1 conducts inspections of proposed Extension Office (*See part III for best practice tips for providing supporting documentation*).
 - Joint operations (*See part IV for best practice tips for providing supporting documentation*).
 - Joint management structure (*See part V for best practice tips for providing supporting documentation*).
 - Joint funding sources and financial oversight (*See part VI for best practice tips for providing supporting documentation*).
 - Extension Office has access to the same legal resources as the Organization in Part 1 (*See part VII for best practice tips for providing supporting documentation*).

Part 8. Declaration of Authorized Officer

- Remember to sign and date this section once the application is complete and ready to submit to OLAP.

Best Practice Tips!

- Have the Authorized Officer be the same person as listed on application(s) for recognition and accreditation.
- For an organization that is already recognized, and the Authorized Officer has changed, you will want to note this in your cover letter so OLAP is notified of this change.

Part 9. Proof of Service on USCIS District Director(s)

- Remember to sign and date this section once the application is complete and ready to submit to OLAP.

Best Practice Tips!

- Make sure that the correct address(s) for the USCIS District Office for the principal and all extension locations are included. Check the USCIS website to be sure the address is correct: <https://www.uscis.gov/scams-fraud-and-misconduct/avoid-scams/become-an-authorized-provider>.
 - If submitting the application electronically to the USCIS District Director, indicate the email address along with the physical address.

III. A description of frequency with which the recognized organization conducts inspections of proposed extension office(s)

Best Practice Tips!

- Include this information in the cover letter and attach an organizational chart with this information as evidence.
 - Organizational chart
 - Make sure the organizational chart is neat, clear, and easy to understand
 - The organizational chart should detail how the immigration program is staffed (both paid staff and any volunteers) and show the chain of supervision for the immigration staff between the main organization and the offices for which extension is being requested.
 - Note which office the accredited representative(s) will be located at. Per OLAP's FAQ, although accredited representatives can work out of any approved extension office(s), there must be at least one accredited representative at each extension office that offers immigration legal services on a regular basis.

IV. Proof of joint operations between the recognized organization and proposed extension offices

Best Practice Tips!

- Include this information in the cover letter and attach an organizational chart, budget and fee schedule as evidence.
- Use CLINIC's sample cover letter, budget and fee schedule/description of legal services and organizational chart as a guide.
 - See above for best practice tips related to the organizational chart.
 - Budget
 - Specify the fiscal cycle as (month/year to month/year).
 - Balance the totals for projected revenue and expenses
 - Specify grants by name of the funder and amount from each funder.
 - Mark fee income as "projected" if for the current or projected year.
 - Include in-kind donations (in-kind or cash) the name of church (or other organization) including the type of in-kind donations
 - Include an expense line item for staff training, technical legal support (if applicable), and law library materials.
 - Fee Schedule
 - Make sure the fees are appropriate for a non-profit that primarily serves low income and indigent clients.

V. Proof of joint management structure between the recognized organization and proposed extension office(s)

Best Practice Tips!

- Include this information in the cover letter and attach an organizational chart, budget, and fee schedule as evidence.

- Use CLINIC’s sample cover letter, budget and fee schedule/description of legal services and organizational chart as a guide.
 - See above for best practice tips related to the organizational chart, budget, and fee schedule.

VI. Proof of joint funding sources and financial oversight over the proposed extension office(s)

Best Practice Tips!

- Include this information in the cover letter and attach an organizational chart, budget, and fee schedule as evidence.
- Use CLINIC’s sample cover letter, budget, fee schedule/description of legal services and organizational chart as a guide.
 - See above for best practice tips related to the organizational chart, budget, and fee schedule.

VII. Proof of access to the same legal resources as the recognized organization

Best Practice Tips!

- Organizations should have access to INA and 8 CFR and note this in the list of legal resources. Although organizations are encouraged to obtain the most up to date print copy of immigration law and regulations, having access to this information via USCIS or EOIR Virtual Library is sufficient.
- Follow the CLINIC template for this document
- For the list of legal resources, EOIR provided guidance in [Matter of EAC, Inc.](#)
- Check that the law library list is neat, clear, and up to date
- Check any internet links to be sure they are still working
- If applicant included a list of email listservs, make sure that they are signed up
- Specify dates for all print resources and remove resources that are more than a few years old

APPLICATIONS SUBMISSION BEST PRACTICE TIPS!

- Include Letter(s) of recommendation from community members or partner organizations attesting to the organization’s involvement and commitment (helpful but not required)
- Present the supporting documents in the same order listed in the cover letter and as outlined in EOIR-31.
- Clearly title/label documents and make sure they match how titles are listed in the cover letter.
- OLAP prefers applications to be submitted via email to R-A-Info@usdoj.gov and you can copy USCIS on the email to OLAP for ease of submission.

SAMPLE COVER LETTER FOR RECOGNITION EXTENSION REQUEST

[DATE]

Recognition and Accreditation Program Coordinator
Office of Legal Access Programs
Executive Office for Immigration Review
5107 Leesburg Pike, Suite 2400
Falls Church, VA 22041

RE: Request for extension of recognition to [number] [organization name] offices located at [full address of each]

Dear Recognition and Accreditation Program Coordinator:

[Organization] is a DOJ recognized organization with its main office located at [full address]. With this application, [organization] is seeking extension of recognition to [number] sub-office locations in [list cities].

[Include a brief description of how the organization in will or does exercise supervision and control over sub offices including the frequency with the organization conducts inspections of proposed extension office]

Enclosed, please find a completed Form EOIR-31 along with an updated organizational chart to demonstrate that [organization] exercises supervision and control over its accredited representatives at the sub-office locations, including frequency of inspections. We are also providing a list of immigration law library resources available at all [organization] office locations to demonstrate that they have access to adequate legal resources. To demonstrate that all offices share the same funding, management, and operations, we are providing a current budget for the immigration program that includes the sub-offices and a current fee schedule used at all office locations. We have included a list of attachments below.

Thank you very much for your fair and rapid consideration of [organization's] request for extension of recognition.

Sincerely,

[Name of Authorized Officer] [Job Title]

Attachments:

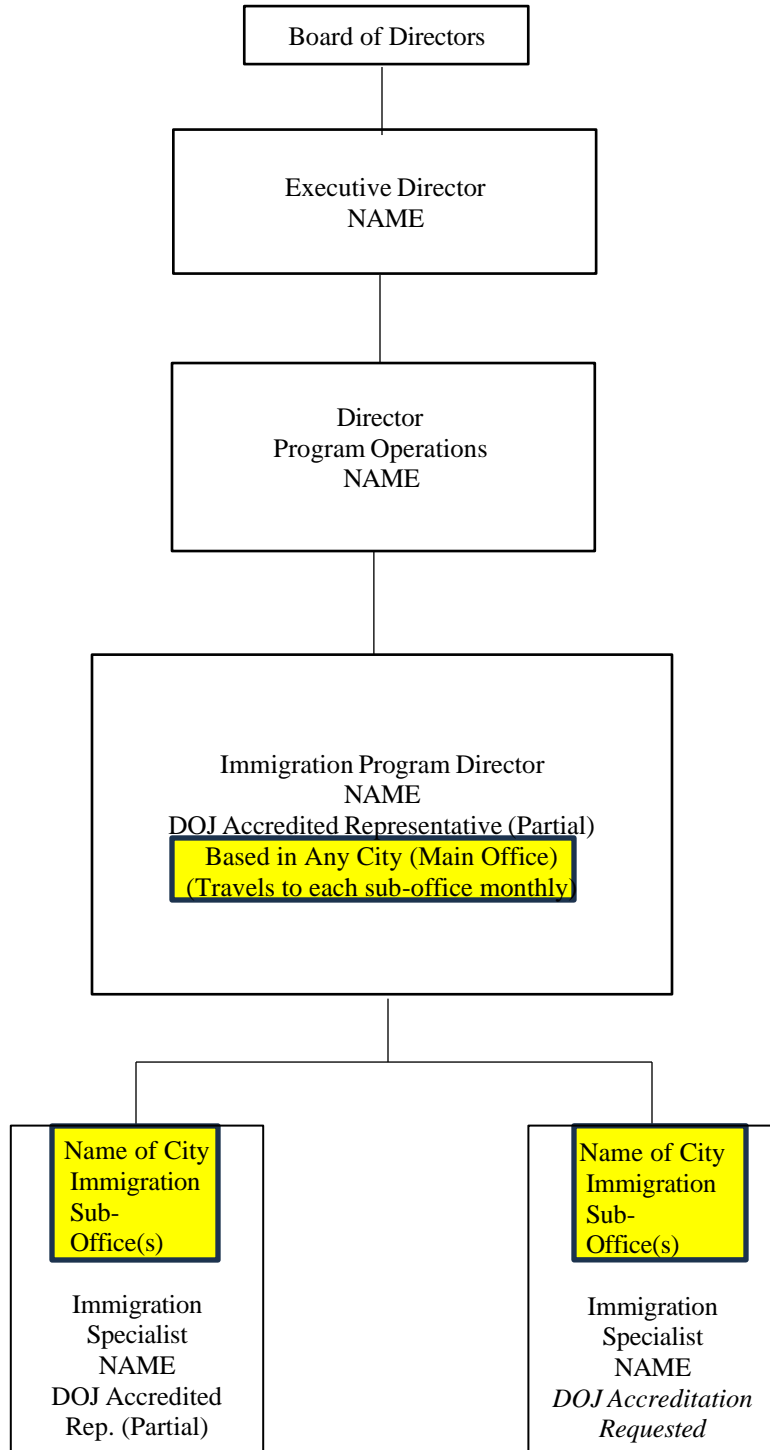
- Form EOIR-31 requesting extension of recognition Rev. Oct. 2022
- A description of frequency with which the recognized organization conducts inspections of proposed extension office(s) – *Please see above and the attached organizational chart*
- Proof of joint operations, joint management structure, and joint funding sources and financial oversight between the recognized organization and the proposed extension office(s). *Please see attached organizational chart, budget and fee schedule.*
- Proof of access to the same legal resources recognized organization. *Please see list of immigration law library resources for all office locations.*

SAMPLE ORGANIZATIONAL CHART

[Organization Name]

Immigration Legal Services Organization Chart

[The organization chart should focus on the immigration program not other programs in the organization]



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SAMPLE BUDGET FOR IMMIGRATION PROGRAM FOR ORGANIZATIONS STARTING AN IMMIGRATION LEGAL SERVICES PROGRAM (1)

[On organization's letterhead]

IMMIGRATION PROGRAM BUDGET 2024 Proposed Budget (July 1, 2024 – June 30, 2025) Prepared on June 1, 2024

(Tip: Make sure you include the name(s) of the grant or fund you are listing in your budget.)

Revenue:

- | | |
|---|---------------------|
| • Local Church Mission Fund | \$3,500.00 |
| • Local Church in-kind donation
- Rent and utilities | \$31,200.00 |
| • Southern District of Larger Denomination (donation) | \$26,000.00 |
| • Grant from Community Foundation of [City] | \$2,000.00 |
| • Individual Contributions and fundraisers | \$20,600.00 |
| • State Grant (approved) | \$50,000.00 |
| • Special Projects Grant (approved) | \$30,000.00 |
| • ABA Foundation Grant (approved) | \$2,000.00 |
| • USCIS Grant (approved) | \$23,000.00 |
| • Projected Client Fees | \$20,000.00 ,000.00 |

Total **\$208,300.00**

Expenses:

- | | |
|---|-------------|
| • Rent/Utilities in-kind | \$31,200.00 |
| • Office supplies and computers | \$3,000.00 |
| • Technology (zoom, internet, phone system, etc.) | \$2,500.00 |
| • Liability Insurance | \$2,000.00 |
| • Case Management Software | \$3,000.00 |
| • Training | \$3,000.00 |
| • Legal Library | \$2,000.00 |
| • Salary (1 full-time entry-level DOJ Rep.) ¹ | \$60,000.00 |
| • Salary (1 full-time entry-level attorney) | \$75,000.00 |
| • Employee Benefits | \$24,600.00 |
| • Technical Legal Support and subscriptions | \$2,00.00 |

Total **\$208,300.00**

¹ Salaries and benefits are hypothetical but based on our study of national rates deemed reasonable for the complexity and difficulty of the positions. CLINIC encourages all providers to offer dignified pay and benefits that is fair for the cost of living and promotes staff retention.
REQUEST FOR EXTENSION OF RECOGNITION JUNE 2024

**SAMPLE BUDGET FOR IMMIGRATION PROGRAM (2) FOR ORGANIZATIONS
WITH AN EXISTING IMMIGRATION LEGAL SERVICES PROGRAM**

[On organization’s letterhead]

**IMMIGRATION PROGRAM BUDGET FOR CURRENT YEAR, FY 2024/2025
(July 1, 2024 – June 30, 2025)**

(Tip: Make sure you include the name(s) of the grant or fund you are listing in your budget.)

INCOME

<u>Source</u>	<u>Amount</u>
Fundraising	
Social Media Fundraiser \	\$12,000
Parish Support	\$7,000
Individual Contributions	\$10,000
Client Fees	\$15,000
In-Kind Support for Space/Utilities	\$20,000
City of Anytown Grant	\$20,000
USCIS Grant	\$10,000
State Grant	\$8,000
TOTAL	\$102,000

EXPENSES

<u>Source</u>	<u>Amount</u>
Staff Salary and Benefits ²	\$72,000
(one entry-level DOJ Rep)	
Space/Utilities (In-Kind)	\$20,000
Office Supplies (postage, printing, etc.)	\$2,000
Immigration Training & Law Library	\$1,600
Case Management Software	\$3,000
CLINIC Membership	\$1,800
Technology (Internet and phone system)	\$1,600
TOTAL	\$102,000

² Salaries and benefits are hypothetical but based on our study of national rates deemed reasonable for the complexity and difficulty of the positions. CLINIC encourages all providers to offer dignified pay and benefits that is fair for the cost of living and promotes staff retention.
REQUEST FOR EXTENSION OF RECOGNITION JUNE 2024

SAMPLE FEE SCHEDULE³

[On organization's letterhead]

IMMIGRATION SERVICES FEE SCHEDULE EFFECTIVE [DATE]

Form	Service	Fee
--	Initial Consultation Fee	\$75
N-400	Citizenship	\$300
N-565	Replace Naturalization Certificate	\$150
N-600	Certificate of Citizenship	\$150
I-90	Renew/Replace Green Card	\$150
I-102	Replace I-94 Card	\$150
I-129R1	Religious Worker Visa	\$350
I-129F	Fiancé Petition	\$300
I-130	Alien Relative Petition (stand-alone)	\$250
I-130	"One Step" Adjustment of Status Package for Spouse/Child Over 14 (includes I-485, I-131, I-765, I-864, and G-325A)	\$450
	For child under 14	\$400
I-485	Adjustment of Status (non-immediate relative)	\$350
	For child under 14	\$200
I-485	Refugee/Asylee Adjustment of Status	\$200
I-485A	Adjustment of Status Supplement A	\$150
DS-230	Consular Packet	\$350
	Each additional family member	\$150
I-131	Travel Document	\$150
I-134	Affidavit of Support for Visit	\$150
I-539	Extend/Change Status	\$200
I-751	Removal of Conditions	\$250
I-765	Employment Authorization	\$100
I-821	Temporary Protected Status	\$150
I-864	Affidavit of Support	\$200
I-864A	Affidavit of Support Joint Sponsor	\$175
I-360	Petition for Widow/Battered Spouse or Child	\$350
I-824	Application for Action on Approved Application or Petition	\$150
I-730	Refugee/Asylee Relative Petition	\$75
I-918	Complete U-Visa	\$450
AR-11	Change of Address	\$15
--	Infopass Appointment (one per application free)	\$75
--	Translate Document	\$20/page
	Cap on translation	\$100

NOTE: No one will be turned away based on inability to pay. A fee waiver is available for those who qualify. USCIS charges separate fees for processing applications filed. Those USCIS filing fees are not reflected above.

³ CLINIC recommends organizations conduct a program cost analysis, survey local organizations and consider their immigration program budget when determining how much to charge for each service. For more information about setting fees, please visit our case management toolkit at <https://www.cliniclegal.org/toolkits/case-management>

[Click here to return to part VII of this checklist](#)

SAMPLE LIST OF IMMIGRATION LAW LIBRARY RESOURCES FOR ALL OFFICE LOCATIONS

[On organization's letterhead]

These are only examples, not a complete list of immigration references and resources. Depending on the types of immigration services your organization provides, seek other resources by talking to experts in the field. At a minimum, it is recommended that your organization have print copies of the *Immigration and Nationality Act (INA)* and *Title 8 of the Code of Federal Regulations (8 CFR)* as well as online resources, which are readily available. In addition, it is highly recommended that your organization have a budget to purchase and update immigration law library resources annually since immigration laws change constantly.

[include a statement describing how extensions offices will access these materials]

Print Resources

The Immigration and Nationality Act (INA), latest edition [year]

Title 8 of the Code of Federal Regulations (8 CFR), latest edition [year]

Kurzban's Immigration Law Sourcebook, 18th Edition, Ira J. Kurzban and the National Immigration Lawyers Association, 2022

A Guide for Immigration Advocates, 23rd Edition, Immigrant Legal Resource Center, 2022

Naturalization & U.S. Citizenship: The Essential Legal Guide, 17th Edition, Immigrant Legal Resource Center, 2022

U.S. Citizenship and Naturalization Handbook, 2022-2023 Edition, Daniel Levy, Charles Roth, and the National Immigration Project of the National Lawyers Guild

Immigration Law and the Family, 6th Edition, Charles Wheeler and the American Immigration Lawyers Association, 2020

FOIA Requests and Other Background Checks: A Practical Guide to Filing Records Requests in Immigration Cases, 2nd Edition, Immigrant Legal Resource Center, 2020

DACA: The Essential Legal Guide, 4th Edition, Immigrant Legal Resource Center, 2021

Inadmissibility and Deportability, 6th Edition, Immigrant Legal Resource Center, 2021

The VAWA Manual: Immigration Relief for Abused Immigrants, 8th Edition, Immigrant Legal Resource Center, 2020

Online Resources

Executive Office for Immigration Review Virtual Law Library,

<https://www.justice.gov/eoir/virtual-law-library>

USCIS' website with the current INA, 8 CFR, all immigration-related forms, policy manuals, and updates from the government, <https://www.uscis.gov/>

Department of State Visa Bulletin, <https://travel.state.gov/content/visas/en/law-and-policy/bulletin.html>

Catholic Legal Immigration Network, Inc. (CLINIC) Citizenship Toolkit, available at <https://cliniclegal.org/toolkits/citizenship>

CLINIC Case Management Toolkit, available at <https://cliniclegal.org/toolkits/case-management>

CLINIC handbook, Managing an Immigration Program: Steps for Creating and Increasing Legal Capacity, <https://cliniclegal.org/resources/program-management/managing-immigration-program-steps-creating-and-increasing-legal>

Basic Procedural Manual for Asylum Representation, National Immigrant Justice Center, <https://www.immigrationadvocates.org/nonprofit/library/>

CLINIC's monthly affiliate newsletter and daily list serve with immigration law updates, news from the Catholic network, a training schedule, and information on immigration advocacy efforts

Immigration Advocates Network (IAN), www.immigrationadvocates.org list serve and web-based library with podcasts, webinars, video trainings, calendar of training dates, and news alerts

USCIS e-mail updates regarding policy changes and new guidelines

Detention Watch Network Listserv, <https://www.detentionwatchnetwork.org/signup>

Siskind's Immigration Bulletin, <https://lp.constantcontactpages.com/su/qX2e4ol/Siskindsignup>