

April 20, 2026

The Honorable Todd Blanche  
Acting Attorney General  
U.S. Department of Justice

Daren K. Margolin  
Director, Executive Office of Immigration Review  
U.S. Department of Justice

**RE: Reinstating Staff for Department of Justice Recognition and Accreditation Program**

Dear Acting Attorney General Blanche and EOIR Director Margolin:

We write on behalf of more than 330 legal service providers, faith-based institutions, and community organizations throughout the country to urge the Department of Justice (DOJ) to immediately reinstate qualified staff to the Recognition and Accreditation (R&A) program, located in the Executive Office for Immigration Review's (EOIR). The R&A program is a vital, low-cost mechanism that has served the American immigration system for nearly 70 years<sup>1</sup> — providing affordable legal assistance to immigrants, combating fraud, and reducing the burden on immigration courts. Its effective operation depends on trained federal staff, and the recent removal of all program personnel with decision-making authority threatens to bring it to a complete halt.

**The Significance of the Department of Justice R&A Program**

Established in 1958, the R&A program authorizes Recognized Organizations – which are community-based organizations such as faith-based nonprofits, legal aid providers, victim service providers, and social service agencies – to offer immigration legal services through credentialed non-attorney staff known as Accredited Representatives. Today, the program impacts:

- More than 2,600 Accredited Representatives across the country.<sup>2</sup>
- Almost 950 Recognized Organizations, including many faith-based providers and community organizations.<sup>3</sup>
- Tens of thousands of clients each year, many of whom cannot afford a private attorney.
- Underserved communities where attorneys are scarce or unavailable.

The program is also the primary safeguard against *notario* fraud and the unauthorized practice of law (UPL) — a persistent problem in immigration legal services that exploits vulnerable immigrant communities, complicates case management, and adds financial costs to EOIR and the Department of Homeland Security (DHS). By licensing and regulating legitimate providers, the R&A program effectively distinguishes between quality legal counsel and fraudulent services, thereby protecting immigrants from exploitation while simultaneously expanding access to reliable legal representation.

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<sup>1</sup> <https://www.ecfr.gov/current/title-8/chapter-V/subchapter-B/part-1292>

<sup>2</sup> <https://www.justice.gov/eoir/page/file/942311/dl?inline>

<sup>3</sup> <https://www.justice.gov/eoir/page/file/942301/dl?inline>

## The Current Crisis

The R&A program does not receive any appropriated funding, but it does require trained adjudicators from EOIR to review and approve Forms EOIR-31 (applications for organizational recognition) and EOIR-31A (applications for individual accreditation). Historically, these applications were processed within 90 days — a standard that allows organizations to plan, staff, and serve their communities with professionalism and competence.

In 2025, processing times had already stretched to 6–8 months due to understaffing. Now, the abrupt reassignment of all federal staff from the program has created setbacks for legal service providers and EOIR itself, as reported by CBS News<sup>4</sup>. While the program continues to accept applications, no one in the office can approve them. No new organizations can receive recognition. No new representatives can be accredited. Even routine renewals — required to maintain good standing — are in limbo. This undermines EOIR’s stated mission to expeditiously process as many R&A applications as possible in order to increase access to counsel and streamline the Department’s operations.<sup>5</sup>

The consequences are severe and immediate:

- Organizations that have followed every rule cannot obtain or potentially renew their Recognition, jeopardizing their legal authority to serve clients.
- Accredited Representatives face career uncertainty as their credentials cannot be granted or renewed.
- Immigrants — including those in active removal proceedings — are losing access to the affordable legal services they depend on.
- Courts and adjudicators lose the benefit of well-presented cases, which are resolved more efficiently.
- The vacuum created by the program collapse will be filled by *notarios* and fraud, harming immigrants and the systems that govern them in this country.<sup>6</sup>

## Our Requests

We call on the Department of Justice to take the following steps without delay:

- Reinstate trained adjudicators to the R&A program immediately, including senior officials with authority to issue decisions on Forms EOIR-31 and EOIR-31A.
- Restore the 90-day processing standard to ensure continuity for Recognized Organizations, Accredited Representatives, and the clients they serve.
- Resume meaningful stakeholder engagement between EOIR and the organizations and communities that depend on the R&A program. A public program must be held accountable to those it affects.

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<sup>4</sup><https://www.cbsnews.com/news/justice-dept-guts-office-helping-indigent-immigrants-affordable-legal-aid/>

<sup>5</sup> Letter from EOIR’s Office of Policy to The Catholic Legal Immigration Network, Inc. (CLINIC) and stakeholders reaffirming its commitment and duty to the DOJ R&A Program. (Nov. 12, 2024).

<sup>6</sup> [The Washington Post 2025/05/1](#)

R&A is a small program that delivers enormously: reducing court backlogs, preventing fraud, creating meaningful employment, and ensuring that immigrants have access to competent legal counsel regardless of their means or location. With over 11 million unadjudicated USCIS applications and more than 3.3 million cases pending in immigration court, this is not the moment to dismantle one of the immigration system's most effective and affordable legal infrastructure programs.

Many of our organizations have partnered with EOIR for decades — providing services rooted in our faith traditions, our professional commitments, and our deep ties to the communities we serve. We stand ready to work constructively with DOJ to strengthen this program. But it must first be staffed and functional.

**We urge you to act now to restore the R&A program to full operation.**

Sincerely,

330+ local, state, and national organizations (listed below)

**Local**

Alianza NORCO, Fort Collins, CO  
All Saints Immigration Services, Jackson, TN  
Alliance for Refugees, Plainsboro, NJ  
Alliance San Diego, San Diego, CA  
American Gateways, Austin, TX  
Arab American Heritage Council, Flint, MI  
Ark Immigration Clinic at Congregation Beit Simchat Torah, NY, NY  
Asha's Refuge, Memphis, TN  
Asian Americans Advancing Justice Southern California, Los Angeles, CA  
Asian Counseling and Referral Service, Seattle, WA  
Asian Pacific Islander Legal Outreach (APILO), San Francisco, CA  
Baptist Immigration Center, McKinney, TX  
Bethany Immigration Services, Silverthorne, CO  
Bonding Against Adversity, Inc., Houston, TX  
BPSPS Center for Community Advancement, Inc, Westminster, CA  
BPSOS-Houston, Houston, TX  
Buffalo Immigrant Leadership Team (BILT), Buffalo, NY  
Cabrini Immigrant Services of New York City, NY, NY  
Camino Immigration Services, Fullerton, CA  
Capaces Leadership Institute, Woodburn, Oregon  
Carolina Immigrant Alliance, Rock Hill, SC  
Catholic Charities East Bay, Oakland, CA  
Catholic Charities Eastern Washington, Spokane, WA  
Catholic Charities Family and Community Services, Rochester, NY  
Catholic Charities of Northern Nevada, NV

Catholic Charities of Orange County, Santa Ana, CA  
Catholic Charities of Philadelphia, Immigration Legal Services, Philadelphia, PA  
Catholic Charities of Southern Colorado, Pueblo, CO  
Catholic Charities of the Archdiocese of Newark, Newark, NJ  
Catholic Charities of the Dioceses of Arlington- Hogar Immigrant Services, Arlington, VA  
Catholic Charities of Raleigh, Raleigh, NC  
Catholic Charities, Diocese of St. Petersburg, St. Petersburg, FL  
Catholic Community Services of Utah, Salt Lake City, UT  
Catholic Migration Services, NYC, NY  
Center for Immigrant Development, Inc, Bridgeport, CT  
Central American Resource Center (CARACEN), Washington, DC  
Central American Resource Center of Northern California-CARACEN SF, San Francisco, CA  
Central Ohio Worker Center, Columbus, OH  
Central Washington Justice for Our Neighbors, Ellensburg/Walla Walla/Tri-cities, WA  
Centro CHA, Inc, Long Beach, CA  
Centro La Familia Advocacy Services, Fresno County/Central Valley, CA  
Centro Legal de la Raza, Oakland, CA  
Chinese Community Center, Houston, TX  
Chinese Mutual Aid Association, Chicago, IL  
Chinese-American Planning Council, NY, NY  
Christian Immigration Services, El Paso, TX  
Church Communities International, Ulster Park, NY  
Coastside Hope, Half Moon Bay, CA  
COFEM – Consejo de Federaciones Mexicanas, CA  
Community Center for Immigrants, Milwaukee. WI  
Community Lawyers, Inc., Compton, CA  
Community Legal Services in East Palo Alto, East Palo Alto, CA  
Compañeros: Four Corners Immigrant Resource Center, Durango, CO  
Conklin Immigration Law, LLS, Perry Hall, MD  
CT Lobos Y A Inc., Austin, TX  
CUASVAHH, Inc., Jacksonville, FL  
Del Camino Jesuit Border Ministries, Brownsville, TX  
Direct Immigration Services, Inc., San Bernadino, CA  
Easy Bay Sanctuary Covenant, Berkeley, CA  
Edgerton Legal, LLC, Reno, NV  
Emerald Isle Immigration Center, Queens, NY  
Enlace Services, Inc., Rochester, NY  
Erie County Bar Association VLP, NY, NY  
Erie Neighborhood House, Chicago, IL  
Esperanza Immigration Legal Services, Philadelphia, PA

Estrella del Paso, El Paso, TX  
Flint Alliance for Immigrant Rights (FAIR), Flint, MI  
Florence Immigrant & Refugee Rights Project, Tucson/Florence, AZ  
For the Nations Refugee Outreach, Garland, TX  
GEMS, Worcester MA  
Georgia Asylum and Immigration Network, Atlanta, GA  
HANA Center, Chicago, IL  
Her Justice, NY, NY  
Hispanic Services Council, Inc., Tampa, FL  
Hispanic Unity of Florida, Hollywood, FL  
Hope Border Institute, El Paso, TX  
Hogar Immigrant Services, Alexandria, VA  
Hope Immigration Inc., Colorado Springs, CO  
Horn of Africa Services, Seattle, WA  
Houston Immigration Legal Services Collaborative, Houston, TX  
Hudson Valley Justice Center, White Plains, NY  
Human Services Council of NY, NYC, NY  
Hudson Valley Justice Center, White Plains, NY  
Human Services Council of NY, NYC, NY  
Iglesia de Jesucristo Pentecostal UPCI, Colorado Springs, CO  
Imigra Foundation, Ltd, NYC, NY  
Immigrant Connection-Blue Ridge, Roanoke, VA  
Immigrant Hope – Greeley, Greeley/Evans, CO  
Immigrant Hope - Arroyo Grande, CA  
Immigrant Hope – San Leandro, San Leandro, CA  
Immigrant Hope – Wyoming/Idaho, Jackson, WY  
Immigrant Legal Center of Boulder County, Boulder, CO  
Immigrants' Assistance Center, Inc., New Bedford, MA  
Immigration Advocacy Support Center, New London, CT  
Immigration Institute of the Bay Area, San Francisco, CA  
Immigration Resource Center of San Gabriel Valley, Monrovia, CA  
India House Houston, Houston, TX  
Indo-American Center, Chicago, IL  
Integrated Community, Steamboat Springs, CO  
Jewish Family Service of San Diego, San Diego, CA  
Jubilee Immigration Advocates, San Francisco, CA  
Justice At Last, San Francisco, CA  
Kerry Harrington Immigration Law, LLC, Vineland, NJ  
Korean Community Service Center, Seattle, WA  
La Casa Hogar, Yakima, WA

La Esperanza, Georgetown, DE  
La Luz Hispana dba La Luz Centro Cultural, Hampton, IA  
La Posada, INC, Twin Falls, ID  
La Raza Community Resource Center, San Francisco, CA  
Latino Community Association, Bend, OR  
Latino Memphis, Memphis, TN  
Law Office of Hina Naveed, PLLC, New York, NY  
Libreria del Pueblo, Inc, San Bernardino, CA  
Life Span, Des Plaines/Chicago, IL  
Literacy Source, Seattle, WA  
Lucha Ministries, Fredericksburg, VA  
Macomb Immigrant Service Center, Fraser, MI  
Mariposa Advocacy and Legal Services, Ventura, CA  
Mayor's Office of Immigrant, Migrant, and Refugee Rights, City of Chicago, Chicago, IL  
Mercy Center, Bronx, NY  
Mi Casa, Winston-Salem, NC  
Migraid, Houston, TX  
Migrance Initiative Inc, Philadelphia, PA  
Migrant & Immigrant Community Action Project, St. Louis, MO  
MinKwon Center for Community Action, NY, NY  
Mission El Paso & Guymon Church of the Nazarene, El Paso, TX/Guymon, OK  
Monarch Immigration Legal Services, Grand Rapids, MI  
Multicultural Family Center, Akron, PA  
Nations Ministry Center, Nashville, TN  
Neighborhood House, Seattle, WA  
Neighborhood House of Milwaukee, Milwaukee, WI  
Neighborhood Ministries, Phoenix, AZ  
Neighbors Link, Mt. Kisco, NY  
New American Pathways, Atlanta, GA  
New Immigrant Community Empowerment (NICE), New York, NY  
New York Legal Assistance Group, NY, NY  
Nuestra Casa, Sunnyside, WA  
OCA-Greater Houston, Houston, TX  
Open Door Immigration Services, Beverly, MA  
Open Immigration Legal Services, Oakland, CA  
Part of the Solution (POTS), Bronx, NY  
Partners for our Communities (POC), Palatine, IL  
Phoenix Legal Action Network, Phoenix, AZ  
Project Ishmael, New Orleans, LA  
Protecting Civil Rights, Inc., Westlake, OH

Public Law Center, Santa Ana, CA  
Puentes de Esperanza, Fairview Heights, IL  
Restoration Immigration Legal Aid, Arlington, VA  
Safe Passage Project, NY, NYC  
San Bernardino Community Service Center, Inc. San Bernardino, CA  
San Joaquin College of Law, New American Legal Clinic, Clovis, CA  
San Luis Valley Immigrant Resource Center, Alamosa, CO  
SEAMAAC, Inc, Philadelphia, CA  
SLFC/We Rise SF, San Francisco, CA  
Sisters of the Presentation of the Blessed Virgin, Sioux Falls, SD  
Social Action Ministry Syracuse Catholic Dioceses, Syracuse, NY  
Social Action. Ministry Syracuse Catholic Dioceses, Central NY  
Sonoma County Public Defender's Office, Santa Rosa, CA  
Sonoma Immigrant Services, Sonoma, CA  
South Asian Network, Los Angeles, CA  
South Bronx United, Inc., Bronx, NY  
St. James Immigrant Assistance, Seattle, WA  
TCS Immigration, Plantation, FL  
The Citizenship Project, Las Vegas, NV  
The Community Bridge at Cape Coral Community Church, Cape Coral, FL  
The Fresno Center, Fresno, CA  
The Legal Clinic, Honolulu, HI  
The Protestant Episcopal Church in the Diocese of Los Angeles IRIS, Los Angeles, CA  
The Welcome Project PA, Hatboro, PA  
TODEC Legal Center, Perris, CA  
Up Valley Family Centers of Napa County, Calistoga, CA  
Vital Immigrant Defense Advocacy Services (VIDAS), Santa Rose, CA  
Volunteers of Legal Service, NY, NY  
Western Oaks Church of the Nazarene dba Immigration Center, Oklahoma City, OK  
Westside Community Center, West Chester, PA  
Women's Faith Circle Legal Services, Sharon Hill, PA  
Word of Hope, Inc., Bloomfield, NJ  
YWCA Golden Gate Silicon Valley, San Jose CA

**State**

Advocates for Immigrant Rights, WA  
Ascend Justice, IL  
Asian Americans Advancing Justice-Atlanta, GA/TN/AR/MS  
Ayuda, IL  
Ayuda, DC/VA/MD  
Borderlands Resource Initiative, AZ  
CAIR-CA, CA

CAIR-LA, CA  
CAIR-Washington, WA  
California Collaborative for Immigrant Justice (CCIJ), CA  
California Immigration Project, CA  
Canopy Northwest Arkansas, AR  
CARACEN, CA  
Catholic Charities Community Services, Archdiocese of New York, NY  
Catholic Charities of Louisville, KY  
Central American Refugee Center (CARACEN NY), NY  
Central American Resource Center (CARACEN), CA  
Centro Binacional Para El Desarrollo Indígena Oaxaqueño, CA  
Chaldean American Ladies of Charity, MI  
Charlotte Center For Legal Advocacy, NC  
Chinese for Affirmative Action, CA  
Church World Service  
Civic Empowerment Coalition  
Coalition for Humane Immigrant Rights (CHIRLA), CA  
COFEM  
Colorado Immigrant Rights Coalition, CO  
Contigo Immigrant Justice, NM  
Despertar Latino, IL  
Dorcas International Institute of Rhode Island, RI  
Education and Leadership Foundation, CA  
Family Focus, IL  
Florida Immigrant Coalition, FL  
Hanul Family Alliance, IL  
HIAS Pennsylvania, PA  
HICA, AL  
Hispanic Affairs Project, CO  
Hispanic American Mission, OK  
Home is Here NOLA, LA  
Hope Immigration Center, GA  
Illinois Coalition for Immigrant and Refugee Rights, IL  
Illinois Venezuelan Alliance, IL  
Illinois Workers in Action, IL  
Immigrant Children Advocates' Relief Effort (ICARE), NY  
Immigrant Defenders Law Center, CA  
Immigrant Legal Advocacy Project (ILAP), CA  
Immigrant Law Center of Minnesota, MN  
Immigrant Legal Services, UT  
Immigration Center for Women and Children, CA  
Immigration Law & Justice Michigan, MI  
Immigration Law & Justice New York, NY  
Immigration Law and Justice of Northern Illinois, IL  
International Institute of Minnesota, MN  
Iowa Migrant Movement for Justice, IA

ISLA: Immigration Services and Legal Advocacy, LA  
Jalloh's Upright Services of North Carolina, NC  
Just Neighbors, VA  
Just Neighbors Ministry Inc, VA/MD  
Justice and Mercy Legal Aid Center, CO  
Latin Advocacy Network – LATINAN, CA  
Literacy Solutions, Haverstraw, NY  
Louisiana Advocates for Immigrants in Detention, LA  
Louisiana Organization for Refugees and Immigrants, LA  
Massachusetts Immigrant and Refugee Advocacy Coalition, MA  
Michigan United, MI  
Mid-South Immigration Advocates, TN  
Mountain State Justice, Inc, WV  
Nevada Immigrant Coalition, NV  
New Jersey Consortium for Immigrant Children, NJ  
New Mexico Immigrant Law Center, NM  
New York Immigration Coalition, NY  
Nicaraguenses en el Mundo Texas, Inc., TX  
Northwest Immigrant Rights Project, WA  
Oasis Legal Services, CA  
Ohnusa, FL  
OneAmerica, WA  
Pars Equality Center, CA  
Project Citizenship, MA  
Refugee Women's Alliance (ReWA), WA  
Rocky Mountain Immigrant Advocacy Network, CO  
Sojourner House, RI  
Southeast Asian Coalition, NC  
Sur Legal Collaborative, GA  
Syrian Community Network, IL  
Tennessee Immigrant and Refugee Rights Coalition, TN  
Tennessee Justice for Our Neighbors, TN  
Texas Immigration Law Council, TX  
The Immigration Project, IL  
The International Institute of Metropolitan Detroit, MI  
The Protestant Episcopal Diocese of Massachusetts. MA  
United Resource Center, CA  
Utah Domestic Violence Coalition, UT  
Vision Comunitaria de Oregon, OR  
Worker Justice Center of New York, NY  
Wyoming Coalition Against Domestic Violence and Sexual Assault, WY\

### **National**

Acacia Center for Justice  
Adrian Dominican Sisters  
Alianza Hispanoamericana NFP, Inc.

American Friends Service Committee (AFSC)  
American Immigration Lawyers Association (AILA)  
American-Arab Anti-Discrimination Committee (ADCO)  
Arise Immigration Services  
Catholic Legal Immigration Network, Inc. (CLINIC)  
Center for Gender & Refugee Studies  
Center for Migration Studies  
Church World Service  
Civic Empowerment Coalition  
Dominicanos USA  
Educational and Legal Immigration Ministries  
Franciscan Action Network  
Hands United  
HIAS  
Hispanic American Association of East Texas  
Human Rights First  
Immigrant Hope – Mesa  
Immigrant Justice Corps  
Immigrant Legal Resources Center  
Immigration Equality  
Immigration Law & Justice Network  
Innovation Law Lab  
International Refugee Assistance Project  
International Rescue Committee  
Jesuit Refugee Service USA  
Kids In Need of Defense (KIND)  
Lawyers for Good Government  
Mennonite Central Committee U.S.  
Multicultural Family Center, Sherman, TX  
NALEO Educational Fund  
National Immigrant Justice Center  
National Immigration Law Center  
National Immigration Project  
National Korean American Service and Education Consortium (NAKASEC)  
National Network To End Domestic Violence  
National Partnership for New Americans  
NETWORK Lobby for Catholic Social Justice  
Nigerian Center  
Public Counsel  
Refugee Council USA

Refugees International  
Religious of the Assumption  
Tahirih Justice Center  
UFW Foundation  
UnidosUS  
Unitarian Universalists for Social Justice  
VECINA  
Vera Institute of Justice  
We are CASA  
Welcoming America  
West Coast Mennonite Central Committee (8897)  
Witness at the Border  
World Relief