

Comment from Mariel Townsend on *Nonlawyer Assistance and Representation*
July 19, 2024

To: The Administrative Conference of the United States

I am submitting a public comment on Nonlawyer Assistance and Representation. I currently volunteer with the Florida Immigrant Coalition (FLIC), which is a DOJ EOIR Recognized Organization, and employs DOJ EOIR Accredited Representatives. I volunteer with them during citizenship drives in which they assist immigrants to complete the N-400, under the supervision of the DOJ Accredited Representative, as well as attorney volunteers. I am currently enrolled in Villanova's Interdisciplinary Immigration Studies Training for Advocates (VIISTA) program, with the goal of having the educational background to become a DOJ Accredited Representative myself.

Through my work with FLIC, and my studies with Villanova, I have seen first hand the impact that having access to assistance from a DOJ-accredited org/representative can make for low-income people and members of other underserved communities in navigating the N-400 process, as well as the TPS application. Having this type of nonlawyer assistance available helps address the shortage of affordable legal services.

One thing that I think is crucial to ensure that nonlawyers who are assisting and representing immigrants are effective in their work to assist immigrants is ensuring that they have proper training. I believe the sort of formalized training like the VIISTA program provides is a strong template that could be adopted by organizations seeking to ensure that their representatives fully understand how to work with immigrant populations, the legal processes they are supporting, and the import of ensuring that they are supporting these populations in an accurate, responsible, thoughtful, and sustainable way.

Another thing that I think would be helpful is expanding awareness of DOJ Accreditation to immigrant-serving orgs, and to immigrant populations, and making available standardized, affordable training opportunities to support becoming a DOJ Accredited representative.

I personally have seen how the use of DOJ Accredited representatives has enabled FLIC to expand the population of immigrants that they are able to serve. Ensuring these reps have standardized and affordable training options will ensure that the quality of this service is maintained across the organizations that have this accreditation.

Thank you for your consideration of these comments.

Sincerely,

Mariel Townsend