

Docket (/docket/USCIS-2011-0015) / Document (USCIS-2011-0015-0019) (/document/USCIS-2011-0015-0019)  
/ Comment

 PUBLIC SUBMISSION

## Comment Submitted by Elissa Taub

Posted by the **U.S. Citizenship and Immigration Services** on Aug 15, 2023

View More Comments 2 (/document/USCIS-2011-0015-0019/comment)

View Related Comments 4 (/docket/USCIS-2011-0015/comments)

Share ▾

Comment

I am an immigration attorney and Partner with the law firm Siskind Susser PC based in Memphis, TN. I primarily file employment-based immigration petitions and applications, including H-1B petitions. I thank USCIS for opening this Notice and Comment period that contemplates electronic filing of H-1B petitions. In theory, filing electronically will make the process more efficient, allow for faster filing of petitions and will save reams of paper and shipping costs. I welcome those benefits.

On the other hand, USCIS's online filing system is so unfriendly to attorneys and has so many technical bugs that I fear we will quickly lose control of these filings. My primary USCIS account has been wiped of all my case information since June. I cannot get technical assistance to fix it. The online tech help only allows me to pick from a dropdown menu of existing receipt numbers. Because the technical glitch has wiped all receipt numbers from my account, it looks like I have no pending cases. Without a pending case, I cannot get assistance with my account. I have used Twitter (X) without success to ask for help. Meanwhile, my pending cases are going unmonitored, because I cannot see any case updates.

I urge USCIS to provide general technical assistance to attorneys with MyUSCIS accounts so that we can access our case information before rolling out online filing of H-1Bs.

In addition, my individual clients are all creating MyUSCIS accounts, which is great for them to get information about their cases. But I'm finding that their case information is not also showing up in my account, so they are obtaining information about cases before I do. In some cases, my client has responded to a Request for Evidence (RFE) without consulting me, which has left them at risk for denial of a pending application. I urge USCIS to better integrate attorneys into the online filing process so that we can fully represent our clients by having access to the same information at the same time they do.

Finally, online filing by an attorney currently involves our sharing a code with our client to facilitate their acknowledgment and assent to the filing. The process is cumbersome and time-consuming. Often it requires a video meeting to share screens to ensure the client reviews the application and follows the filing

instructions. On some days, we file multiple H-1B petitions for the same client, which would require multiple codes and collaboration. I urge USCIS to devise a different way of confirming a client's consent to filing than the code sharing when it comes to H-1B filings. The requirement will make the process of filing H-1Bs frustrating for employers and attorneys.

I thank USCIS for moving toward electronic filings. Overall, this move should be better for attorneys and our clients. Unfortunately, the process is not set up for attorney use. Because most H-1Bs are filed by counsel, it is important that USCIS acknowledge the vital role that attorneys play in the process and make the filing process simple and easy to use for us and our clients.

**Comment ID**

USCIS-2011-0015-0020



**Tracking Number**

llb-a3z0-s8n6

**Comment Details**

---

**Received Date**

Aug 14, 2023

---



*Your Voice in Federal Decision Making*

[About \(/about\)](#) [Bulk Data Download \(/bulkdownload\)](#) [Agencies \(/agencies\)](#) [Learn \(/learn\)](#)

[Reports \(/resources.regulations.gov/public/component/main?main=Reports\)](#) [FAQ \(/faq\)](#)

[Privacy & Security Notice \(/privacy-notice\)](#) | [User Notice \(/user-notice\)](#) | [Accessibility Statement \(/accessibility\)](#) | [Developers \(https://open.gsa.gov/api/regulationsgov/\)](https://open.gsa.gov/api/regulationsgov/) | [FOIA \(https://www.gsa.gov/reference/freedom-of-information-act-foia\)](https://www.gsa.gov/reference/freedom-of-information-act-foia)

[Support \(/support\)](#) [Provide Site Feedback](#)

