

August 2, 2024

Samantha Deshommes  
Chief, Regulatory Coordinator Division Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security

Submitted via [www.regulations.gov](https://www.regulations.gov)

**Re: Comment in response to DHS/USCIS Agency Information Collection Activities; Revision of a Currently Approved Collection: Application for T Nonimmigrant Status, Application for Derivative T Nonimmigrant Status, and Declaration for Trafficking Victim; OMB Control Number 1615-0099 Docket ID: USCIS-2006-0059**

Justice at Work Pennsylvania (“Justice at Work PA” or “JaW”) respectfully submits the following comment on the Agency Information Collection Activities; Revision of a Currently Approved Collection: Application for T Nonimmigrant Status, Application for Derivative T Nonimmigrant Status, and Declaration for Trafficking Victim, published on July 11, 2024. We appreciate the opportunity to provide comments.

JaW, formerly Friends of Farmworkers, has served and advocated for low-wage workers across Pennsylvania for nearly 50 years. We provide free immigration and employment legal services to low-wage workers. We also advocate for just immigration and employment policies at a local, state, and federal level. JaW began representing applicants for T nonimmigrant status in the 2010s, with a focus on survivors of labor trafficking. To date, JaW has successfully represented over 100 trafficking survivors in obtaining T nonimmigrant status. JaW has also worked with myriad local, state, and federal stakeholders in a deeply collaborative effort to combat human trafficking.

**I. We write in support of the changes made to I-914.**

First, we applaud USCIS for the addition of “another gender identity” category on Form I-914 Page 2, Part 2, Question 8. This change will allow applicants to most correctly select their genders and is more inclusive language than the previous “male/female” categories alone. We similarly support the change from “his or her” to “their” and “he or she” to “they” in various locations on form I-914.

Second, we appreciate the edited language on page 3, part 3, question 6 from “I am under 18 years of age” to “I was under 18 years of age at the time at least one of the acts of trafficking occurred.”



We hope this change will allow clients who were trafficked while at one time underage but have since turned 18 to honestly present their experiences. Some of our clients were trafficked over long periods of their lives, and we feel the new specification reflects a proper understanding that trafficking acts can be numerous and extended in duration.

## **II. We write in support of changes made to I-914 Supplement A and B**

In line with our perspective on gender inclusive language added in the primary form, we appreciate similar changes throughout Supplement A, such as the use of “they” pronouns and “spouse” instead of the previous “husband/wife” options. We also applaud the use of gender inclusive language in Supplement B.

We also appreciate clarifying language throughout the supplement establishing where answers asking for information are pertaining to the derivative family member as opposed to information about the primary applicant. We hope these changes will reduce misunderstandings for applicants.

## **III. Conclusion**

Justice at Work commends USCIS for many of the revisions to this form and its supplements.

On behalf of Justice at Work Pennsylvania,

*Sadie Basila*

Sadie Basila  
*Legal Intern*

*Lerae Kroon*

Lerae Kroon  
*Senior Lead Advocacy Attorney*