

PUBLIC SUBMISSION

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Docket: USCIS-2012-0012

Request for Deferred Action for Childhood Arrivals, Form I-821D

Comment On: USCIS-2012-0012-0017

Agency Information Collection Activities: Consideration of Deferred Action for Childhood Arrivals, Form I- 821D, Revision of a Currently Approved Collection

Document: USCIS-2012-0012-0019

Comment Submitted by Andrew Brooks

Submitter Information

General Comment

1. Thank you for requesting feedback on this important program.
2. I am an Immigration attorney who has prepared scores of DACA applications.
3. The time required and monetary costs to applicants to obtain supporting documents are not unreasonable. For applicants who are currently in school and have been in school since June 15, 2007, a transcript is all I have used to prove presence before age 16, presence since that day, and current enrollment. For applicants who have graduated many years ago, I ask the applicant for phone records, bank statements, utility bills, or other receipts. My sense is that the monetary costs to obtain these records is not unreasonable.
4. For applicants without a passport that has English on it, I use the birth certificate to prove qualifying age, which in turn requires a translation. I estimate that roughly 75% of my DACA clients required a translation. I have not had to translate any other document except the birth certificate.
5. Generally, the most difficult part of the application for the applicants is remembering or finding addresses where they lived long ago, for some applicants as many as 20 years ago. If the applicant is unable to locate the address, I simply put the city and state where they lived. I have had no problems getting approvals for applications that did not list every street address.