



*Protecting Immigrant
Women and Girls
Fleeing Violence*

January 25, 2019

Submitted via <http://www.regulations.gov>

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

Re: Comments in Response to OMB Control Number 1615-0067 / Docket ID USCIS-2007-0034 published in the Federal Register on November 27, 2018: Proposed Extension of the Currently Approved USCIS Form I-589 Application for Asylum and Withholding of Removal

Dear Ms. Deshommnes:

The Tahirih Justice Center is a national, nonpartisan policy and direct services organization that has assisted over 25,000 immigrant survivors of gender-based violence throughout the past twenty-one years. Our clients endure unimaginable atrocities such as human trafficking, domestic violence, and sexual assault. As such, we are pleased to submit the following comments regarding US Citizenship & Immigration Services' current Form I-589 Application for Asylum and Withholding of Removal and corresponding instructions.

We look forward to your detailed feedback on these comments, and please contact me at irenas@tahirih.org or 571-282-6180 for additional information.

Respectfully,

Irena Sullivan
Senior Immigration Policy Counsel

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COMMENTS:

I-589 Form

Current Question	Proposed Change	Explanation
Page 6, Part B, Question 2 Information About Your Application (continued)	Clarify whether an “arrest” includes immigration apprehension.	It is currently unclear.
Page 7, Part C, Questions 2a and 2b Additional Information About Your Application	Provide two separate boxes for the responses.	The question has two parts and should therefore have two separate boxes for the responses to maximize clarity.
Page 8, Part C, Question 6 Additional Information About Your Application (continued)	Clarify whether an “arrest” includes immigration apprehension.	It is currently unclear.
Page 4, Part A.III., Question 5 Information About Your Background, names of parents and siblings	Increase the size of the spaces provided for applicants to write their siblings’ and parents’ names.	Most names do not fit in the spaces provided and therefore cannot be accurately written. This is particularly true for those who have two last names.

I-589 Form Instructions:

Current Instruction	Proposed Change	Explanation
Page 7-8, Part VI, Questions 1 & 2 Required Documents and Required Number of Copies That You Must Submit With Your Application	Instead of describing “Required Documents and Required Number of Copies” using the current paragraph format (“ie, documents such as...”), use a bullet point format listing exactly what documents are required, how many copies of each are needed, and what documents are just examples of what could be submitted to fulfill the application requirements.	The way it this is currently written is confusing for and not specific enough.
Page 8, Part 9 Biometrics, Including Fingerprints and Photographs	Add the following words in red below, to the second paragraph of this instruction: “You and your eligible spouse or children, regardless of age, listed on your asylum application as derivatives must provide biometrics...”	The way the instruction is currently worded is unclear because it wrongly implies that <i>all</i> family members listed on the Form I-589 (regardless of derivative status) need to undergo biometrics.