



Cast



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August 29, 2024

Ur M. Jaddou, Director  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue, NW  
Washington, D.C. 20529

Re: Request for USCIS to Accept Prior Edition of I-914 Forms Through At  
Least October 28, 2024

Dear Director Jaddou:

The American Immigration Lawyers Association (AILA), the Coalition to Abolish Slavery and Trafficking (CAST), Freedom Network USA, and ASISTA write to you regarding yesterday's issuance of a new version of Form I-914 and related forms that are effective yesterday, August 28, 2024, with no notice and no grace period.<sup>1</sup> Given that many I-914 applications were likely mailed prior to yesterday's form edition change in anticipation of the new T bona fide determination process effective for applications received on or after August 28, 2024, we respectfully request that USCIS retroactively reinstate the 04/01/24 edition of Form I-914 and related forms and provide a grace period during which both the 04/01/24 and 08/28/24 editions can be submitted.

On June 26, 2024, USCIS announced an extension of the prior form edition grace period and indicated that the 04/01/24 edition of Form I-914 and related forms would be required beginning August 28, 2024. Similarly, as of August 27, 2024, USCIS's English I-914 webpage indicated that starting August 28, 2024, only the 04/01/24 edition of the I-914 and related forms would be accepted. Yesterday, an 08/28/24 edition was announced as required beginning that same day; the 08/28/24 edition was unavailable prior to yesterday. Given that other unrelated forms updated yesterday included a grace period of at least 60 days (e.g. Forms I-485, I-539), and given that the Spanish I-914 webpage continues to indicate that the 04/01/24 edition is the accepted I-914 form edition, we understand that yesterday's same-day I-914 edition change may have been inadvertent.

Form edition changes with advance notice would reduce barriers for trafficking survivors while

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<sup>1</sup> USCIS, *Forms Updates*, available at <https://www.uscis.gov/forms/forms-updates> (noting yesterday's I-914 update effective yesterday, 8/28/2024). USCIS's email notification of form changes sent yesterday afternoon indicates that the I-914 was updated at 8:26am EDT on 8/28/2024.

still meeting agency needs. It regularly takes several meetings—often over the course of a few months—to prepare T visa applications for survivors and their eligible family members. Trafficking survivors are often indigent and represented by pro bono counsel, who in turn often have high caseloads to meet the need for affordable legal representation. Survivors who cannot obtain free or low-cost representation are left to represent themselves or pay attorney’s fees which can be significant and which are often increased when counsel must redo forms. Form changes without notice or with extremely short grace periods further burdens survivors—who often already struggle to obtain counsel and prepare their applications while meeting other basic needs and recovering from trafficking-related trauma—and causes undue stress and labor for both survivors and those working with them, including law enforcement I-914B signatories. Additionally, a same-day form change without a grace period inevitably leads to the submission of outdated forms, resulting in extra work for USCIS to reject and return the forms to individuals who will eventually resubmit those applications.

Aside from reducing barriers for trafficking survivors and minimizing additional burden on USCIS due to form rejections, a grace period of at least two months is pragmatic given that the 04/01/24 and 08/28/24 versions of the forms themselves are substantially similar and collect virtually the same information. In implementing a grace period for the I-914 and related forms, USCIS would still be assured it receives full and complete information necessary to thoroughly review applicant eligibility while minimizing the potentially substantial number of forms it would have to reject due to the same-day edition change.

We therefore respectfully request that USCIS update its website indicating it will accept either the 04/01/24 or 08/28/24 edition of forms I-914, I-914B, and I-914A through at least October 28, 2024 to avoid creating unnecessary hardship for trafficking survivors, their families, and those who assist them. We also respectfully request that the initial received date of any I-914-related applications rejected as of 08/28/24 due to the same-day edition change be honored when a rejected filing is resubmitted to USCIS, or when the same individual submits an updated form version.

Thank you for your attention to this critical matter, and for your work to support trafficking survivors and their families. Should you have any questions or require additional information, please contact Carson Osberg (AILA VAWA/U/T Committee Chair) at [carson@castla.org](mailto:carson@castla.org) or Amy Grenier (AILA Policy & Practice Counsel) at [agrenier@aila.org](mailto:agrenier@aila.org).

Sincerely,

American Immigration Lawyers Association (AILA)  
Coalition to Abolish Slavery and Trafficking (CAST)  
Freedom Network USA  
ASISTA Immigration Assistance (ASISTA)

cc: Avidah Moussavian, Chief, Office of Policy and Strategy, USCIS

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