

Reaching Illinois Immigrant Communities

Building Legal Services Capacity In Advance of Immigration Reform



**Prepared by the
Illinois Immigration Legal Aid Collaborative**

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Information in this report does not constitute legal advice, and immigrants are encouraged to seek legal advice from a licensed immigration lawyer or Board of Immigration Appeals-recognized organization.

Reaching Illinois Immigrant Communities

Investing in Immigration Legal Services Today and Following Reform

Prepared by the
Illinois Immigration Legal Aid Collaborative

Table of Contents

Executive Summary	4
Introduction	5
Lessons From the Past	7
The Undocumented Population in Illinois	11
Immigration Legal Services in Illinois	12
Key Findings and Recommendations	13
Expand immigration legal expertise	13
Invest in technological infrastructure	15
Maximize strategic coordination and collaboration to support legal aid organizations	17
Build upon proven legal service delivery models	19
Conclusion and Next Steps	20
Appendices	21
Appendix 1: Four Phases of Immigration Reform	
Appendix 2: Applicant's Path to Registered Provisional Immigrant Status	
Appendix 3: Immigration Legal Service Providers in Illinois	

EXECUTIVE SUMMARY

This report provides an overview of current immigration legal service capacity in Illinois and identifies actions needed to expand access to information and high-quality legal services for low-income immigrants should Congress pass immigration reform. We estimate that 511,000 Illinois residents may be eligible to seek legal status if comprehensive immigration reform passes. The majority of these individuals need legal consultations before applying to assess their eligibility for reform and other relief and to avoid deportation. The Urban Institute projects that each legal organization in Illinois would need to assist in the preparation of 13,000 applications during the one-year enrollment period.¹ Projections like these underscore the necessity for immediate investment in infrastructure updates and strategic planning.

To meet this challenge, members of the Chicago and Illinois legal services community formed the Illinois Immigrant Legal Aid Collaborative (IILAC) in 2013 to create a cohesive statewide network of immigration legal service providers and to identify ways to increase the collective capacity of providers. Collaboration is particularly critical as federal immigration laws are poised to change in ways that will allow millions of new individuals and families to seek immigration benefits through a complex and lengthy legal process.

Based on interviews with members of the legal services community, a 2013 DePaul University College of Law conference of Illinois community-based organizations, two recent surveys of Illinois immigration legal service providers, and fall 2013 convenings of the IILAC steering committee and its member immigration legal aid organizations, IILAC identified four primary recommendations to increase legal services capacity in preparation for the passage of immigration reform:

I. Expand immigration legal expertise. The immigration legal service community must increase the number of qualified immigration law practitioners. This goal may be achieved by expanding current immigration programs within Board of Immigration Appeals (BIA)-recognized organizations via additional locations and/or increasing the number of qualified BIA-accredited individuals.² These steps will allow legal service organizations to increase their capacity to handle immigration legal work. Organizations also should work to grow the field of trained *pro bono* attorneys and law students able to handle cases, and train non-legal volunteers to assist with aspects of immigration cases that are essential but do not require immigration expertise.

II. Invest in technological infrastructure. As part of this report, IILAC assessed organizations' current infrastructure needs and identified gaps, particularly in organizations' technological capacities. One response to these findings is currently underway: the creation of an online intake tool by Illinois Legal Aid Online. This intake tool should be expanded to include specific intake for applicants applying for benefits under immigration reform, and made available to immigration legal service providers. Organizations also must work together to develop effective referral systems for both applicants and inter-organizational use.

III. Maximize strategic coordination and collaboration to support legal aid organizations. Immigration legal service programs must increase collaboration to develop and share best practices for delivery of immigration legal services and to address constant changes in immigration law. Partnerships with civil society, including government agencies, are critical to supporting effective legal services. Organizations also would benefit from expanded technical assistance on how to diversify and increase financial resources through collaboration, and opportunities to do so.

1 Erwin De Leon & Robert Roach, Urban Institute, *Immigrant Legal-Aid Organizations in the United States* (Oct. 17, 2013), available at <http://www.urban.org/publications/412928.html>.

2 The Board of Immigration Appeals falls under the Department of Justice, Executive Office for Immigration Review. One of its core responsibilities is to oversee and regulate the practice of immigration law by non-attorneys. Organizations that wish to use non-attorneys to practice immigration law must follow a series of requirements and receive recognition. Non-attorneys wishing to practice immigration law must go through a separate but linked accreditation process, including application and training requirements.

IV. Build upon proven legal service delivery models. Because of the size, diversity, and broad geographic scope of Illinois' immigrant population, legal service providers will need to rely on a variety of models to reach and serve communities. Successful past models that should be considered include large-scale screening workshops, *pro bono* clinics, *pro se* materials, one-on-one legal services, and community and web-based application preparation and informational sessions of varying sizes.

These recommendations focus on maximizing efficiencies through strategic coordination, multi-level training, and infrastructure improvements. They draw on existing strengths and relationships, and incorporate lessons learned from past legalization efforts and recent experience with the Deferred Action for Childhood Arrivals (DACA) program. Though legal reform is still under debate, the prospect of new laws has already generated significant interest among immigrant communities who will benefit from thoughtful preparation and coordination by legal service providers and all others involved.

The data gathered through this recent effort demonstrate that the time to dedicate resources to improving legal services is now. Efforts must start today to support organizations to meet the expected demand for legal services. Expanding financial resources to build and sustain essential infrastructure and to increase legal expertise is key, as legal services organizations begin to address the future needs of Illinois' deserving immigrant communities.

INTRODUCTION

Illinois is enriched by the presence of approximately 1.8 million immigrants, making it the sixth largest destination state for aspiring Americans. About 511,000 of Illinois' noncitizens are undocumented, which means they have yet to secure legal permission to live and work in the United States.³ Despite their tenuous legal status, undocumented individuals in Illinois contribute substantially to their communities. According to the Center for American Progress, immigration reform with a roadmap to citizenship would produce a \$30.4 billion cumulative increase in gross state product over 10 years and a \$16.3 billion cumulative increase in the earnings of all state residents over 10 years. Additionally, allowing Illinois' undocumented residents to legalize their status would create 4,400 additional jobs annually.⁴

On June 27, 2013, the U.S. Senate passed comprehensive immigration reform bill S. 744. While the future of S. 744 remains unclear, the U.S. House of Representatives is contemplating immigration reform and appears poised to pass some reform measures that could in the near future dramatically alter the legal landscape for immigrants in the United States.

This report assumes that certain provisions in S.744 will be part of any legalization process, including the following: (1) applicants have one year to apply for Registered Provisional Immigrant (RPI) status once the application period begins; (2) applicants must prove that they have been in the country since December 31, 2011; (3) applicants must choose at the outset whether they will pursue status under the new provisions, and once they complete the first step and receive RPI status they will be locked in and precluded from seeking permanent residence through any other legal channel ("lock-in" provision); and (4) there is no assurance that information disclosed in the RPI application process will not be used against applicants for immigration enforcement or criminal prosecution.

Moreover, immigration reform will not be limited to creating a legalization system; it will also make sweeping changes to other aspects of current immigration laws and their enforcement. S.744 contains provisions that substantially change high-skilled and family-based immigration. For example, it eliminates the visa category that

3 Rob Paral and Associates, *Undocumented Immigrants in Illinois*, http://robparal.com/IL_Undoc.html (last visited Feb. 27, 2014).

4 Robert Lynch & Patrick Oakford, Center for American Progress, *National and State-by-State Economic Benefits of Immigration Reform* (May 17, 2013), available at <http://www.americanprogress.org/wp-content/uploads/2013/05/EconomicsOfLegalization-2.pdf>.

Estimated timeline for rollout of a new immigration law (based on S.744 provisions):

- At least six months after the law is signed for the Department of Homeland Security to develop regulations, including a public comment period
- One year after law is signed until the beginning of the application period
- One year to apply for Registered Provisional Immigrant (RPI) status once the application period begins (but may be extended up to 30 months)
- Six years after obtaining RPI status, individuals must apply for an extension
- 10 years after obtaining RPI status, individuals may apply for lawful permanent residence (LPR) status
- 3 years after obtaining LPR status, individuals may apply to become citizens
- Youth and agricultural workers eligible for an expedited path to citizenship

allows U.S. citizens to petition for their siblings and expands the options for close family members to apply for legal status. Other provisions in S.744 dramatically increase enforcement of immigration law, which may lead to an increased number of immigrants in removal proceedings seeking legal representation.⁵

The impact of the “lock-in” provision will be significant. Individuals pursuing RPI status will do so to the exclusion of other forms of immigration relief. This means that even if individuals are or become eligible for other immigration benefits that could lead to permanent status more quickly and cheaply, once they opt to apply for and are granted RPI, they will no longer be able to pursue any other form of relief. During the DACA response, legal service providers found that a large proportion of undocumented immigrants who sought legal assistance for the first time to pursue the temporary relief were in fact eligible for more permanent status. It is likely that many undocumented immigrants who come forward for RPI status will also, with adequate legal counsel, realize they are eligible for swifter paths to permanent status that already exist.

Additionally, repercussions for those who submit

faulty RPI applications because they receive inadequate or misleading legal advice will be severe. Regardless of whether an individual’s application is prepared *pro se*, by a well-meaning community member, or by an unscrupulous entity seeking to profit from the new law, the penalties will be the same: financial loss, missed or delayed opportunity for legal status, and, at worst, deportation and long-term family separation. Moreover, stories of individuals being deported due to their applying for RPI status may deter other qualified individuals from seeking status, thereby undermining the process.

For these reasons, applicants must have access to comprehensive legal screenings from immigration law experts prior to submitting applications. The hundreds of thousands of undocumented immigrants living in Illinois are unique individuals with complex life stories; thorough legal consultations will be necessary to ensure each person pursues the most appropriate legal course. Legal screenings will require a deep knowledge of immigration law, including a nuanced awareness of the complexities within the new bill. Therefore, screenings should be completed by immigration attorneys, experienced BIA-accredited representatives, and well-supervised paralegals and *pro bono* lawyers, rather than non-specialized volunteers.

Additionally there will be a significant number of immigrants not eligible for legalization due to the presence requirements or bars for criminal convictions. Ineligible individuals are likely to be targeted for removal, and significant resources will continue to be needed for removal defense. Thus, it will be important to ensure that legal service organizations providing removal defense can continue this form of representation while also responding to the demand to serve those seeking RPI status.

⁵ Removal proceedings are civil proceedings where judges in immigration court determine whether an individual should be removed (commonly referred to as deported) from the United States.

Legal service providers must be prepared to implement an effective, coordinated response to reform that will match the anticipated demand, and at the same time continue to serve those who are eligible for lawful status outside of the immigration reform track. In order to respond to the anticipated influx of clients seeking immigration legal services, IILAC organizations need to increase capacity in the following four areas:

- I. Expand immigration legal expertise
- II. Invest in technological infrastructure
- III. Maximize strategic coordination and collaboration to support legal aid organizations
- IV. Build upon proven legal service delivery models

The time is now to invest in these four areas to be able to increase legal services for undocumented immigrants living in Illinois—a community whose needs, even without immigration reform, are not currently fully met. Adequate funding is necessary to achieve such a response. Illinois legal service providers consistently cite lack of funding as a primary challenge to establishing the staffing and technological infrastructure necessary to meet current and future demands for services. Many legal aid organizations rely on grant funds, which typically are project-based and time-specific, and generally do not cover the costs of overhead and administrative functions, which are critical to ensure accurate reporting and compliance. With funds earmarked for specific programs, there rarely is funding available to improve office technology and infrastructure. Diverse funding streams and access to information on available financial resources are critical to organizations' development. In addition, some funders have previously tied funding to unsustainable metrics, setting quotas for service delivery that are unrealistic or disproportionate to their financial support. Funder education also will be an important aspect of preparation to respond to a new immigration law.

IILAC's strategic vision for the legal services infrastructure necessary to respond to comprehensive immigration reform will be complemented by outreach and education efforts coordinated by the Illinois Coalition for Immigrants and Refugee Rights (ICIRR). ICIRR will undertake a large grassroots initiative to organize the community and provide individuals potentially eligible for these new benefits with timely and accurate information. Such information will both direct eligible immigrants toward competent legal service providers and steer them away from exploitative operations perpetrating fraud on Illinois' immigrant communities. Another necessary element of this effort will be working with the private sector, and banks or credit unions in particular, to aid immigrants in affording the fees involved in this process. Such efforts are already underway. The work of legal service providers should be coordinated with ICIRR's grassroots' efforts.

LESSONS FROM THE PAST

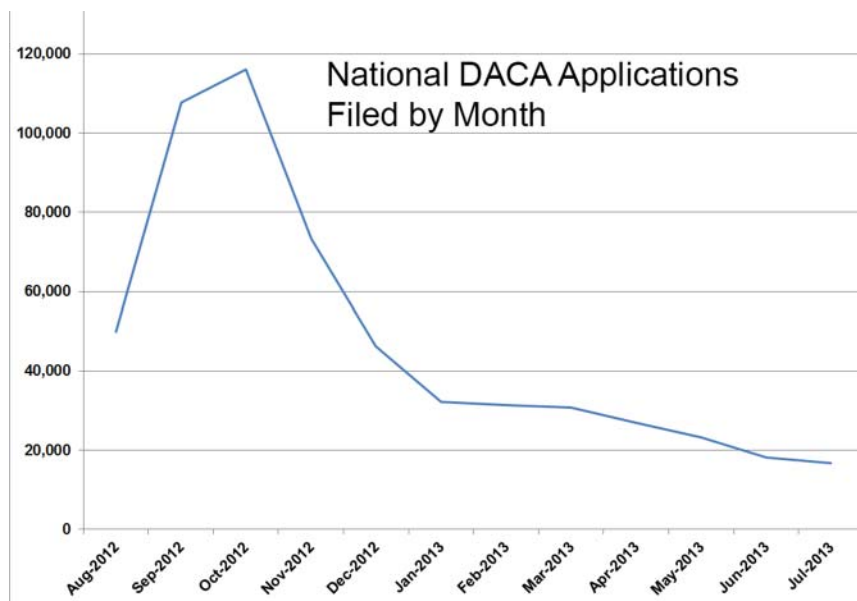
In preparing for the substantial influx of client needs that will flow from immigration reform, IILAC benefits from past efforts undertaken by advocates who responded to large-scale legalization programs: the Immigration Reform and Control Act of 1986 (IRCA), which legalized certain seasonal agricultural workers and undocumented immigrants who had entered the United States before January 1, 1982, and the administrative 2012 DACA initiative, which provides a temporary reprieve from deportation for immigrant youth who arrived in the United States at an early age and pursued education or served in the U.S. military. Three key lessons, highlighted below, can inform the development of current initiatives.

Advance Preparation and Flexibility

Advance planning is critical so there are “boots on the ground” ready to respond as new laws and policies are unveiled and implemented. However, these plans must be nimble, that is, able to adapt based on rapidly changing facts both in Washington and on-the-ground so that programs can be adjusted quickly as the realities of the application process emerge.

Enacted on November 6, 1986, IRCA mandated that the government start accepting applications within six months. Four days before the application period began, the Immigration and Nationality Service (predecessor to the immigration agencies now housed under the Department of Homeland Security) published rules regarding the process.⁶ There was a one-year application period for legalization applicants and 18 months for special agricultural workers. Nearly 2.7 million people received lawful permanent resident status through IRCA.⁷ Application rates slowly rose during the first half of the program and then gradually dropped at the midway point, only to hit a sharp upswing in the closing months of the application period.⁸

DACA, created by a surprise presidential announcement on June 15, 2012, outlined specific criteria for eligibility, and indicated that the application for DACA would be released in 60 days, when an estimated 900,000 eligible immigrants could apply. Given the imminence of the program’s commencement, legal service organizations shifted into high gear to prepare.



Service providers quickly realized that funding for immigration legal service programs would not be available from the national funders, who typically do not fund direct legal services—and certainly not as quickly as was needed to meet the immediate increase in demand. Responding to what would have been a severe shortfall, Illinois funders created a collaborative to invest funds to support local outreach and legal services delivery. The collaborative leveraged its funding to secure some national funding. This funding proved critical to the Illinois effort. Through the end of 2013, about 69 percent of Illinois’ estimated DACA-eligible population had submitted applications, and 60 percent had been approved. This success is likely a credit to the strong coordinated response from Illinois’ funders, legal service providers, immigrant advocacy groups, and local policy makers, as well as law firms and corporations who lent *pro bono* assistance.

6 Donald M. Kerwin & Laureen Laglagaron, Migration Policy Institute, *Policy Brief: Getting it Right Legalization in the United States: Structuring and Implementing an Immigrant Legalization Program: Registration as the First Step* (Nov. 2010).

7 Donald M. Kerwin, Migration Policy Institute, *Policy Brief: Getting it Right Legalization in the United States* (Dec. 2010).

8 S. González Baker, *The Cautious Welcome: The Legalization Program of the Immigration Reform and Control Act* (1990), at 149.

Top 10 States of Residence of Eligible DACA Youth and DACA Applications Accepted for Processing

State of Residence	Currently Eligible Population	Share of Eligible Youth Nationally (%)	Applications Accepted for Processing	Application Rate (%)
North Carolina	26,000	2	19,000	74
Georgia	28,000	3	18,000	63
Illinois	49,000	4	30,000	60
Arizona	33,000	3	19,000	58
Texas	165,000	15	88,000	54
California	311,000	29	153,000	49
Washington	25,000	2	11,000	45
New Jersey	36,000	3	16,000	43
Florida	65,000	6	23,000	35
New York	86,000	8	29,000	34
Total	1,089,000	100	538,000	49

Source: Adapted from Migration Policy Institute, *Deferred Action for Childhood Arrivals at the One-Year Mark, August 2013*, p. 5

In advance of the DACA implementation date, legal service organizations' trained staff took the following steps: (1) developed tools to assess individuals' eligibility, including an online self-assessment tool, (2) cleared intake calendars to reserve slots for DACA applicants; (3) developed streamlined procedures to provide consultations and representation to DACA applicants, and; (4) created materials to train and support *pro bono* attorneys handling DACA cases. At the same time, national organizations developed and distributed document lists, trainings, and additional tools for practitioners to use across the country.

ICIRR, with local partners, coordinated a large workshop on August 15, 2012, at Chicago's Navy Pier that was intended to welcome the arrival of the DACA filing date by providing information, screening, and application completion for eligible individuals. Effective outreach in advance of the rally yielded an enormous response. An estimated 15,000 people attended and received basic information about DACA, but not all were able to receive individualized evaluations because the number of attendees far exceeded expectations. Recognizing the massive interest in DACA and the high level of community engagement on the issue, legal service organizations quickly organized additional large weekend workshops, increased intake hours, referred potential applicants to other resources developed by local and national organizations, and established new models for providing quality immigration legal services to large numbers of individuals.

After several large DACA workshops it became apparent that the large citizenship-style workshops were not as effective in the DACA context. For example, The Immigration Project found that the larger workshops were logistically ill-equipped to serve the population of applicants seeking application assistance. In addition to a lack of resources such as computers and printers, there also were not enough attorneys present to complete the final application screenings. The Immigration Project soon realized that the clinics did not yield completed applications ready to file, which meant staff brought the cases back to the office to finalize—a process which proved to be overly burdensome. As a result, the organization adapted and began to offer detailed information sessions where applicants could prepare applications on their own and then submit the applications to the office for review or representation. Other organizations similarly adapted to similar obstacles. One service provider convened weekly DACA meetings with its partner organizations to share information. Other organizations employed "DACA days" and "DACA classrooms" to serve groups of people at the same time, in manageable numbers with reasonable expectations of what could be accomplished during the workshops.

Pro Se Filing

The IRCA and DACA experiences teach us that where there is a legal services vacuum, individuals will file *pro se*, without legal representation. During IRCA, an estimated 71 percent of applications were filed *pro se*.⁹ It is important to clarify that while these individuals submitted their applications without the full representation of an attorney, many were helped along the application process by Qualified Designated Entities, nonprofit organizations certified to provide legal assistance under IRCA. As for DACA, although it is not known exactly what percentage of all applications were filed *pro se*, a survey by the Pocket DACA mobile application found that 42 percent of its 1,250 users filed their applications *pro se*.¹⁰ Both efforts indicate that a significant number of individuals applied for relief *pro se* and it is safe to assume that this trend will continue with immigration reform. However, a new comprehensive immigration reform process will be complicated and lengthy, even more so due to the possible “lock in” provision. The need for individualized assistance from immigration law experts will be significantly more pressing than in the DACA context. Moreover, while unsuccessful IRCA applicants were generally protected from immigration enforcement by statutory confidentiality provisions, no such protections exist in the current reform proposals. This means applicants who are denied RPI status face the threat of detention and deportation. Because of these risks, support for legal screening for all of Illinois’ undocumented immigrants is critical and *pro se* filing without prior evaluation should be discouraged.

Strong Infrastructure

A prominent lesson learned from DACA implementation in Illinois involves the importance of addressing infrastructure gaps that currently exist within immigration legal service programs. These gaps include physical, technological, and human resources. Examples include lack of physical space for client consultations, meetings and files; lack of technological infrastructure such as online integrated case management systems; and insufficient human resources such as administrative staff and volunteer coordinators. During DACA, these gaps presented unnecessary hurdles and required inordinate effort by legal service staff to ensure their quality of services was not compromised. Early infrastructure investments today would have an immediate impact on organizations and allow more people to receive legal services.

Collaboration

IRCA and DACA also teach us that collaboration between organizations increases efficiency. When organizations share resources, jointly develop best practices, and provide support and guidance to each other, the quality of client services improves significantly. By familiarizing each other with the types of services each organization provides, advocates can make accurate referrals and prevent the need for clients to visit multiple providers. Moreover, advocates can benefit from the camaraderie that flows from close and frequent communication with other organizations, sharing experiences and information. During IRCA and DACA, organizations experienced staff burnout as a result of the intensity of the high-volume work. By providing emotional support to each other in addition to technical legal support, organizations can improve the sustainability of their service models.

9 Bill Ong Hing, *The Immigration and Naturalization Service, Communitybased Organizations, and the Legalization Experience: Lessons for the Self-Help Immigration Phenomenon*, 6 GEO. IMMIGR. L.J. 413 (1992)

10 Immigration Advocates Network, *Survey of 1250 “Pocket DACA” mobile application users*.

THE UNDOCUMENTED POPULATION IN ILLINOIS

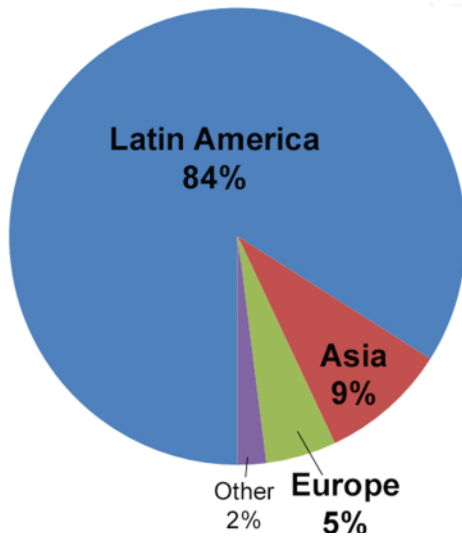
Of the approximate 11 million undocumented immigrants in the country, an estimated 511,000 have made their homes in Illinois.¹¹ About 90 percent of the total undocumented population resides in the eight-county Chicago-metro area:

	Undocumented Total (Rounded)
Cook County	308,000
Chicago	183,000
Suburban Cook	125,000
Collar counties (DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will)	151,000
Downstate (94 counties)	53,000

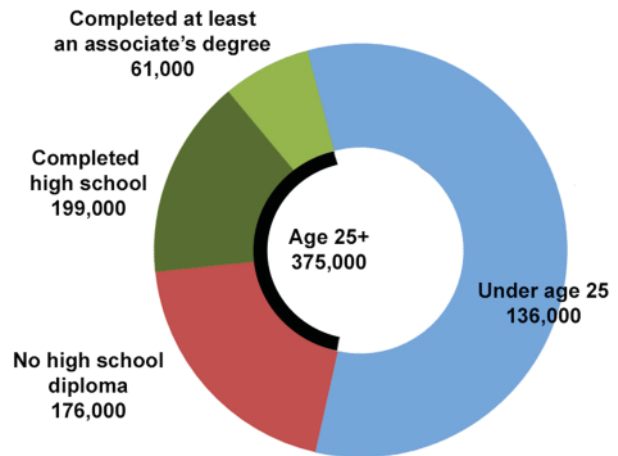


According to the Institute for Taxation and Economic Policy, undocumented immigrants in Illinois paid \$562,093,000 in state and local taxes in 2010.

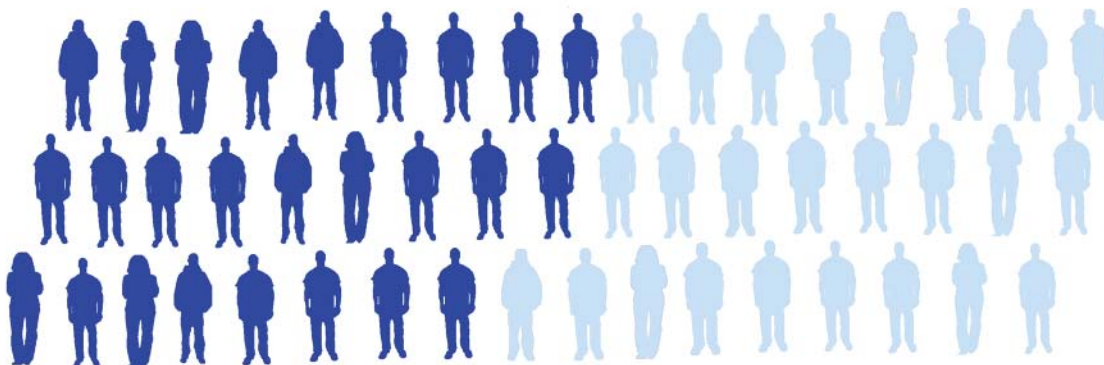
REGION OF ORIGIN



EDUCATION



Slightly more than 50% of the undocumented population has limited or no English skills.



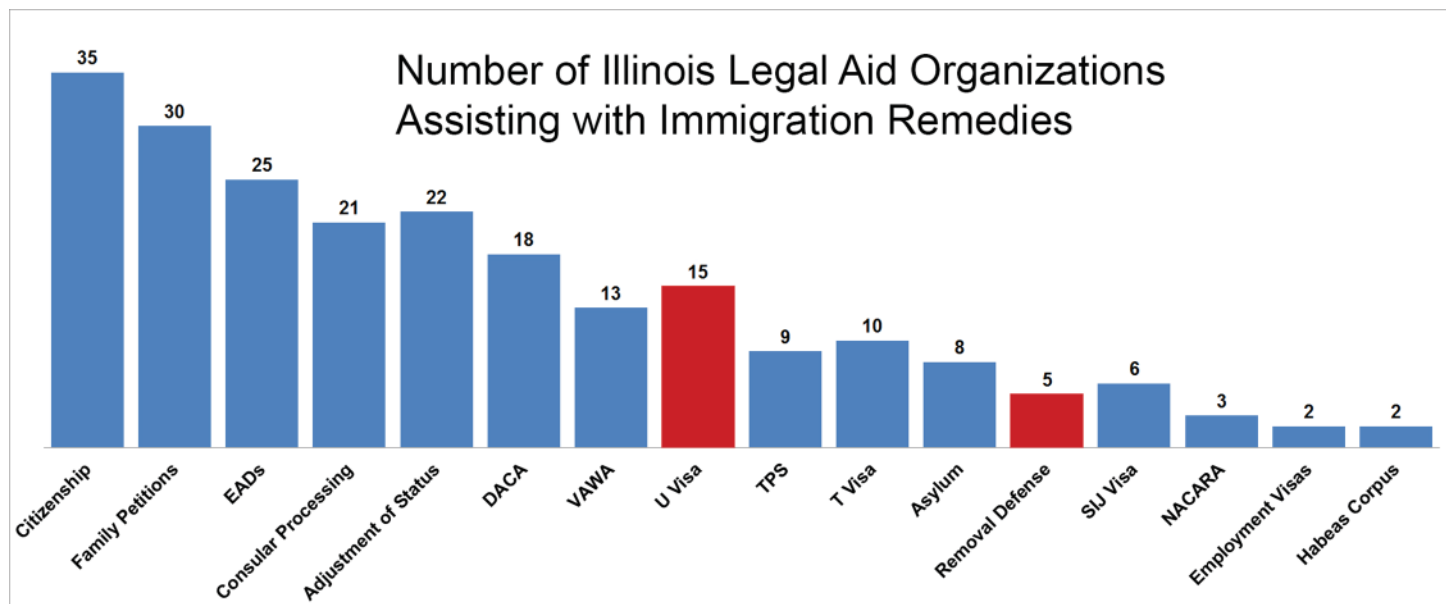
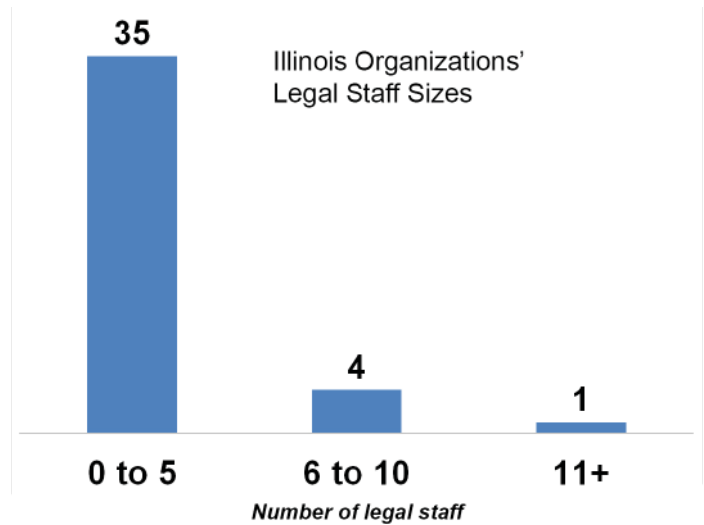
Nearly 53% of the undocumented population lives at 150% or below the poverty line.

¹¹ Unless otherwise noted, all data for this section was provided by Rob Paral and Associates, jointly with the Illinois Coalition for Immigrant and Refugee Rights. See Rob Paral and Associates, *supra* note 3.

IMMIGRATION LEGAL SERVICE PROVIDERS IN ILLINOIS

The data below is based on self-reporting by 40 Illinois immigration legal services organizations which currently employ immigration lawyers and/or BIA-accredited legal staff.¹²

	Staff
Attorneys	46
Fully accredited BIA representatives	8
Partially accredited BIA representatives	53
Paralegals	37
Total Immigration Legal Aid Staff	144



An overwhelming majority of organizations provide assistance with several types of immigration legal remedies, but less than half handle U visas and only five provide removal defense. This is significant: expertise in these areas will be critical to offer adequate advice to applicants seeking benefits under the new law.

¹² See Appendix 3 for the full list of legal aid organizations included in this data.

KEY FINDINGS AND RECOMMENDATIONS

I. Expand immigration legal expertise

1. Maximize expertise of immigration law by expanding existing BIA-recognized organizations and BIA-accredited staff and by coordinating regular training on existing and new immigration laws

One of the immigration community's most limited resources is wide-ranging immigration law expertise. Based on experiences from IRCA and DACA, organizations must be ready to hit the ground running as soon as reform is enacted. Investing early in new staff members who can develop the immigration expertise necessary to handle this legal work will be crucial. In addition to the recommendations discussed below, organizations should prepare to seek funding, should it become available, to hire new attorneys and paralegals.

Now is the time for current immigration legal service providers to take steps to plan for expansion. This might mean that organizations currently providing immigration legal services that are not BIA-recognized seek recognition. In addition, some organizations may seek BIA recognition for satellite offices or additional locations. Increasing the number of qualified BIA-recognized organizations in Illinois now will increase the number of clients who receive competent legal screenings and representation. Because the process to obtain BIA recognition takes months, organizations will be better prepared for legalization if they obtain the necessary recognition prior to enactment of comprehensive reform. DePaul University College of Law and CLINIC provide trainings on BIA recognition, as well as trainings on substantive immigration law and legal skills. Additionally, toolkits for preparing for recognition are widely available.

In a similar vein, BIA-recognized organizations should increase the number of BIA-accredited representatives on staff. ICIRR offers a six-day comprehensive immigration training each year for individuals seeking accreditation. The training offers sessions on immigration law led by experts, including attorneys and accredited representatives from many IILAC organizations; some of the trainers went through the training themselves. The comprehensive immigration law education included in the ICIRR training is important not only for organizations seeking BIA accreditation so they can provide full legal representation, but also for any organization intending to provide comprehensive immigration legal screenings. Additionally, CLINIC has recently developed a comprehensive immigration law course in a six-week e-learning format. While in the pilot phase, this format should provide an opportunity to increase access to these types of trainings.

Continuing education is critical for anyone providing immigration legal services, including those seeking renewal of their BIA accreditation. Immigration law is one of the most complex fields of law and service providers need ongoing training to properly advise immigrants of their options. If Congress passes a new immigration law, the entire immigration legal community will need to quickly learn its requirements and procedures. The legal service community must maximize its legal expertise in other areas of the law such as U visas and removal defense, as many individuals who set out to apply for RPI status will find themselves likely to benefit from additional remedies, or be at risk of removal. Every Illinois legal service organization represented at the fall 2013 IILAC convening registered with the Immigration Advocates Network (IAN) and should take advantage of IAN's free online legal trainings, as well as DePaul's quarterly trainings for its partner organizations. This is only a first step, and organizations' current and future staff must have better access to other continuing education. Recommendation III in this report provides some ideas of how the legal community can work together to provide such training.

2. Increase trained *pro bono* attorneys and law students

Illinois' immigration legal community has benefited significantly from the services of *pro bono* lawyers. Thirty-two Illinois organizations listed in the IAN database use *pro bono* attorneys. This volunteer resource is critical to expanding the legal aid community's capacity to meet current and future demands for legal services. While *pro bono* attorneys who do not specialize in immigration law are not a substitute for immigration specialists, they can be trained to issue-spot and, at minimum, identify cases in need of additional review by an immigration expert. Some also can learn how to prepare and file applications. Once they have been properly trained, *pro bono* attorneys will also play a significant role in preparing applications with clients who have been pre-screened by organizations. Funding for the training and ongoing technical support of *pro bono* attorneys will be integral to expanding legal services. It must be noted, however, that due to the complexity of immigration law, *pro bono* legal services are only beneficial when there is sufficient in-house immigration law expertise to support the *pro bono* attorneys.

As part of its DACA response, the National Immigrant Justice Center (NIJC) recruited law firm attorneys and corporate counsel to host 34 DACA clinics in 12 months to provide *pro bono* representation to 630 immigrant youth. Undergraduate and law students also were used to larger extents than ever before to help with basic application preparation. For example, DePaul University secured funding to train several law and undergraduate interns and place them at its partner organizations. DePaul provided ongoing technical support and guidance to the organizations and the interns. Under appropriate supervision, the quality of legal services was not compromised, and attorneys and representatives were freed to focus on particularly complicated matters. Beyond the DACA context, NIJC has long worked with law students in central and southern Illinois to conduct regular "know your rights" presentations and initial intake at detention centers. NIJC also works with volunteer law students to provide U visa clinics, in which 10 to 15 U visa clients receive full application preparation in one day. LAF trained over 100 volunteer attorneys to hold DACA screening sessions and trained and supervises *pro bono* attorneys who file DACA and U visa applications for those applicants who are eligible for both forms of relief.

There are law schools and universities throughout the state of Illinois, as well as undergraduate pre-law and paralegal graduate programs. Organizations could use these volunteer resources in a number of ways—including expanding their in-house staff through supervised semester-long internships and fellowships. It is possible that schools will support this effort with funding, and students may be willing to volunteer in exchange for training, experience, and possibly class credit.

All of the above models require investments in staff support to manage *pro bono* attorneys and other volunteers. There are different means to provide that support: 1) hire specialized, experienced volunteer/*pro bono* management staff; or 2) reallocate current staff time. Either of these staffing models can succeed as long as there is a point person responsible for management of the program, the individual has the appropriate experience and immigration expertise, and the individual has sufficient time to devote to the *pro bono* and/or volunteer program.

3. Train non-legal volunteers to handle non-legal activities

Partnering with community organizations to provide non-legal assistance to clients will allow attorneys and accredited representatives to focus their time and resources on providing legal expertise. While non-legal volunteers should not be tasked with legal assessment or application completion, they can play a significant role in increasing efficiency by supporting clients and legal workers. During DACA implementation, immigration legal service programs formed partnerships with social service and faith-based organizations who accompanied individuals to appointments and helped them gather documents. Centro Romero cites great success with utilizing volunteers for non-legal activities, such as data entry, copying, document sorting, and client follow-up. This division of labor allowed accredited representatives to focus on the legal aspects of cases, resulting in an ability to serve more clients. Similarly, World Relief DuPage/Aurora established a new category of volunteers: trained

document sorters. During in-house workshops, the document sorters organized client-supporting documents before clients met with the accredited representative or attorney, saving valuable time.

Non-legal volunteers also could be enlisted to assist with outreach to immigrant communities who may otherwise be isolated from legal aid. While the organizational cost of recruiting, training, and overseeing non-legal volunteers should not be minimized, the potential contributions from this group are significant.

II. Invest in technological infrastructure

1. Assess current needs and identify financial resources to build technological infrastructure

While some organizations already have started to adopt online technologies to assist with case management, intake, and community education, other organizations struggle to maintain basic office equipment and have been unable to prioritize the integration of technology into their offices. According to a survey of IILAC member organizations, three organizations are using Microsoft Excel or Microsoft Access, which have very limited capabilities, to track their cases, and 12 reported having no case-management system at all. Twenty percent of IILAC members reported they do not have enough computers, and many who reported having a sufficient number of computers communicated that those computers were slow and unreliable, or relied on outdated software programs. Similarly, one third of organizations reported a lack of sufficient copiers and scanners to meet their current needs.

These technology shortfalls hinder organizations' efficiency in meeting the needs of their current clients, and would be paralyzing in the face of an influx of demand following immigration reform. Furthermore, all organizations stated they would need more computers and equipment—and often more office space—to be able to hire additional staff to respond to a new law.

Expanding statewide collaboration also relies on improving individual organizations' technological infrastructures. Though more than half of organizations stated they were interested in participating in a statewide online intake and referral system such as Illinois Legal Aid Online (ILAO), many said they first would need to adopt case-management systems in order to accommodate this technology.

IILAC organizations commonly cited financial concerns as major limiting factors to making technological and infrastructure upgrades. Several organizations—particularly those that acknowledged they needed updated case management systems—pointed out that in addition to new equipment, investment in staff training and technical support was needed to improve their service delivery.

To meet the demand expected to accompany a new immigration law, the legal aid community must begin infrastructure improvements now.

Key infrastructure technology, facility, and administration components include:

- All organizations, regardless of size, require basic office equipment such as computers, printers, copiers, shredders and phones. While some IILAC groups possess this equipment, others are in need of upgrades, and all would need additional equipment to expand their capacity.
- All organizations, regardless of size, require sufficient work space, including private/semi-private space for consultations. In anticipation of reform, organizations with more than one legal worker need capacity to conduct multiple private client meetings simultaneously. All organizations indicated they either had insufficient space to meet current needs or were at capacity and could not expand further without more space.
- Organizations require adequate administrative-to-legal staff ratios.
- Groups with capacity to provide legal services from locations other than their offices need laptops or

tablets, mobile phones, and portable copiers and scanners.

- All groups, regardless of size, would benefit from adopting integrated online case management systems, accompanied by training and ongoing technical support to ease staff transition and ensure the systems remain functional and responsive to both internal users and clients.
- Many groups, regardless of size, would benefit from the implementation of online intake and screening interfaces and online appointment scheduling. Given the diverse technological abilities of IILAC groups, implementation of these systems would require training.
- Groups with capacity to provide legal services online need online video conferencing, meeting, website and web chat capabilities.

2. Expand the reach and capabilities of the Illinois Legal Aid Online intake tool

ILAO has partnered with NIJC to develop an online electronic intake process that could potentially expand to include all Illinois organizations and to include additional tools, including a referral system. The ILAO system—already in use in other sectors of the Illinois legal aid community—allows users statewide to enter basic demographic and case information and uses branching logic to ask subsequent questions based on each individual’s answers. At the end of the questionnaire, individuals who fall within designated poverty guidelines are referred to legal service providers based on organizations’ pre-determined monthly capacity and priorities.

ILAO currently is building its integration with LegalServer and plans to develop future compatibility with a variety of case management systems used in the immigration sector. Once a legal service provider receives a referral from ILAO, the organization conducts a conflict check and, if there are no conflicts, can merge the information from the online intake form directly into its case management system—thereby reducing valuable staff time to reenter this data. While it is still in the development stage and not yet widely used, the online intake system is a significant step forward to improve efficiency and convenience for both organizations and applicants.

Several steps must be taken before the ILAO intake system is able to be fully utilized by immigration legal service programs of varying size and sophistication. To prepare for future integration of the ILAO online intake, all immigration legal service organizations in Illinois should transition to online case management systems, including the ability to conduct a conflict check. In turn, ILAO must develop compatibility with these systems.

3. Develop an online information hub and listserv for immigration legal service providers

Immigration legal service providers in Illinois do not have an accurate, up-to-date referral system to tap into when they are unable to assist immigrants seeking certain services. Additionally, there is no online calendar where organizations and immigrants can learn about legal service activities hosted by other organizations, or a way to find or share documents online. IILAC proposes developing both a web resource and email listserv to serve clients more efficiently and effectively.

A foundation for this type of increased coordination among immigration legal service programs has already begun. During DACA implementation, DePaul University worked with its partners to create an updated list of immigration legal aid organizations providing DACA representation. Similarly, the Chicago VAWA/U Visa Working Group meets regularly and uses a listserv to provide updates on organizations’ capacities to accept new VAWA and U visa cases. This concept should be taken to the next level: IILAC should create a website that is an information resource for immigration legal service providers. It should include updated, accurate referral information, a calendar with upcoming training and legal service oriented events, and a tool where organizations can share and find templates and documents. In order to implement this idea, IILAC organizations should develop a wish list of functionalities, and further research is needed on which existing web platforms could be tapped. For example, the ILAO online intake tool is being developed to utilize an automated referral system and may be the appropriate place to develop this enhanced functionality. Regardless of where it is housed, this

online information hub is a critical investment. It will decrease unnecessary clerical time, avoid duplication of work, and bring renewed transparency to the work of partner organizations, saving both time and money for immigration legal service programs.

Recognizing that a portion of the immigrant community cannot access online resources, the feasibility of creating a statewide phone hotline should be explored. CARPLS' Legal Aid Hotline for Cook County may serve as a model.

III. Maximize strategic coordination and collaboration to support legal aid organizations

1. Develop and share best practices for delivery of immigration legal services and updates on immigration law

Organizations of all sizes would benefit from having expanded access to forums—online and off—where they could exchange best practices on service delivery and dealing with constantly evolving immigration laws and policies. Even large organizations whose service delivery models already are institutionalized benefit from ongoing sharing of insight and information with colleagues.

In advance of a new immigration law, legal aid organizations consistently have raised the importance of developing and implementing case management and service-delivery systems and practices that ensure quality service.¹³ Given the proposed protracted waits between obtaining initial RPI status, RPI renewals, and green cards, both clients and service providers must establish clear understandings from the beginning regarding the terms of their relationships. Several basic tools used by law offices and many nonprofits ensure quality representation and reduce risks of malpractice. Some of the tools include:¹⁴

- organizational policy and procedure manuals that outline practices to be employed by all staff
- retainer agreements defining clear beginning and end dates and specifically what services the organization is providing
- opening and closing letters, which will be particularly important under reform because of the years-long gaps between the steps in the path to citizenship
- database, file, and retention policies
- fee structures and billing and collection procedures

Ongoing trainings and roundtables on updates to immigration laws and policies also are essential to ensure that legal service providers are fully informed on potential relief and risks for their clients.

Two institutions currently facilitate trainings and information sharing on these topics for a limited number of organizations: DePaul University College of Law's Asylum and Immigration Law Clinic and CLINIC. Both institutions have developed strong models for increasing collaboration among legal service providers and providing technical assistance. Partner organizations receive technical assistance, template sharing, trend spotting, administrative advocacy, and interactive peer support through electronic listservs.

Presently, at least 15 immigration legal service programs in Illinois are not members of these networks and would greatly benefit from access to a similar forum, which could be coordinated through the expansion of

¹³ These topics were discussed in great detail at the Smart Growth/Capacity Building Conference for Immigrant Legal Service Providers held in Chicago on July 22-23, 2013. The DePaul University College of Law, Asylum and Immigration Law Clinic organized and hosted the conference, which offered sessions on building legal service programs and models of legal services delivery.

¹⁴ *See id.*

DePaul's and CLINIC's programs or through IILAC. Respondents to the IILAC technology survey overwhelmingly agreed that a central website where organizations can share and find helpful policy and procedure manuals and documents, as well as updates on immigration law, would be a valuable resource.

2. Work with civil society, including government agencies, to support legal services

The public sector can be extremely helpful in ensuring smooth implementation of a new immigration law. States and municipalities can leverage their respective resources to maximize legal services capacity, in addition to providing direct financial support. DACA provided a strong training ground for local governments to play a critical role. For example, the City of Chicago (home to roughly 183,000 undocumented immigrants) worked closely with immigration legal service providers to address challenges in gathering documentary evidence for applications. Officials facilitated partnerships with legal service providers to educate Chicago Public School (CPS) counselors on the undocumented community and availability of legal services. In turn, service providers provided screening at the various city colleges closest to their agencies, thus sharing the work in the most efficient manner. In response to confusion regarding the acquisition and interpretation of school transcripts, providers and school officials hosted a roundtable discussion with immigration legal service providers and school officials which resulted in increased transparency regarding the school transcript request process. Further, while LAF cannot represent many DACA applicants, it committed to training school counselors and now regularly trains school counselors with CPS staff. The City of Chicago also is working to harness public libraries as hubs for immigration information and to crack down on the fraudulent practice of immigration law. Similar successes took place at the state and federal levels. Ongoing coordination and planning must take place prior to any change in the law so that leverage points can be identified in advance, and longer-term issues can be addressed proactively to ensure smooth implementation. Similarly, strong collaboration with the federal government both at the national and local levels will result in smoother implementation.

Other areas of civil society have been and will continue to be critical in ensuring successful response to comprehensive immigration reform. The implementation effort must tap into organizations and institutions across sectors of civic society, including ethnic-based, faith-based, social services, education, libraries, health care, etc. It will be important to partner with non-traditional organizations to ensure that the legal aid sector's education and outreach are as broad-based as possible, and to channel individuals to the appropriate places for information and services. Notably, ICIRR is convening planning meetings to facilitate outreach with non-traditional partners.

Legal service organizations should also educate government agencies and funders who may provide monetary assistance for the legalization process. In the past, contracts to fund citizenship services have been flawed with insufficient funding and unfeasible demands. The process to screen and complete individual RPI applications will vary among applicants, and it is important that funding provide comprehensive support for both screening and application completion. This includes accounting for indirect costs, such as outreach, overhead, non-attorney time, travel costs, etc. In addition, past contracts have set unrealistic expectations on the number of applications that must be completed, not taking into account that many people who need initial legal screenings do not ultimately qualify to apply for benefits. For example, although there are an estimated 511,000 individuals who will be eligible to apply for RPI in Illinois, there are a host of reasons why these individuals may not be good candidates for RPI. Some may discover that they are eligible for other forms of relief that will help them achieve legal status more quickly and cheaply; others may be advised not to file due to criminal issues. It will be important to establish in advance what metrics legal service organizations should track.

3. Provide technical assistance to help organizations diversify and increase financial resources

Some nonprofit legal service organizations are permitted to charge nominal fees for their services to cover a portion of their costs. Roundtables and trainings to help organizations assess their fee structures and ensure alignment with BIA accreditation rules could help alleviate some financial pressure.

Because even nominal fees are cost-prohibitive for many undocumented individuals, outside funding will remain critical. IILAC should facilitate forums to provide organizations information on available financial resources as well as to communicate to foundations and other potential donors the areas of greatest need.

IV. Build upon proven legal service delivery models

Because of the size, diversity, and broad geographic scope of Illinois' immigrant population, legal aid providers will need to rely on a variety of models to reach and serve communities. Implementation planning must be aggressive but also realistic about the limitations of certain models and strategic about the roles of individual organizations.

Based on experiences with IRCA and DACA (see graph on page 8), the models discussed below must be funded and available as soon as possible after the passage of a new immigration law, and fully functional by the first day of implementation.

Illinois' legal aid community must work together in advance to design a service delivery plan that identifies organizations' roles and responsibilities and to implement strategies that ensure all individuals seeking legalization have the opportunity to receive legal screenings. Below are proposed legal service delivery models:

1. Screening workshops: While mass legal screening and application workshops were critical to the large-scale outreach necessary under DACA, many organizations found that this model was ineffective in bringing cases to completion, and favored smaller events. Workshop models would require significant changes to work for a comprehensive immigration reform effort. As already discussed, the new immigration laws will be complex and will require one-on-one consultations for at least the initial screening phase. Smaller or one-on-one screening sessions could help “weed out” individuals with more complicated cases versus those who could safely complete their applications through a workshop.

2. Pro se materials: Despite efforts to expand immigration legal services capacity in Illinois, it will be impossible to provide representation to every person. The legal aid community should develop a program for unrepresented individuals to pursue the legalization process themselves, or “pro se-plus.” The pro se-plus track would be developed as a shared tool to use by all immigration legal service programs and include checklists and FAQs given to individuals after they have been screened or received a legal consultation.

3. One-on-one legal services: Certain individuals and populations who do not want their undocumented status to be public knowledge may only seek legal assistance through traditional one-on-one consultations and representation in the offices of legal aid organizations that are trusted within their own communities or are more geographically accessible.

4. Pro bono clinics: Smaller-scale events that match pre-screened immigrant applicants with pro bono lawyers and offer sufficient immigration technical support from immigration legal service providers were a successful model for DACA response and could be adapted for a larger-scale legalization effort.

5. Community and web-based information sessions: Webinars and community meetings were critical to reaching large swathes of the DACA-eligible community with basic information about the program, eligibility, and available legal assistance. Similar events and web-based tools should be used to extend legal outreach in the event of a new immigration law.

Reaching Migrant and Seasonal Workers in Illinois

LAF's Illinois Migrant Legal Assistance Project relies on an average of seven law students per summer to live on-site in agricultural areas to conduct legal screenings and provide legal counsel. The work is overseen by one supervising attorney. During the rest of the year, the program reaches a limited number of individuals and relies solely on volunteers to conduct outreach. The program uses technology to efficiently conduct its fieldwork, holding virtual staff meetings and using laptops or tablets to conduct intake and scan documents. According to LAF, the fundamental element to successful outreach in the rural areas is building local relationships and trust.

To expand its reach into Illinois' rural areas, the legal aid community must invest now in building these relationships through further outreach, by maintaining a reputation as a source for credible information about changes in the law, and by demonstrating to these communities that when reform passes, they will be ready and capable of responding to their legal needs. Seeking out and educating local, non-legal partners, also is essential.

Additional funding will be required to expand LAF's successful program and allow other organizations to expand their reach to agricultural areas.

CONCLUSION

While the challenge looms large, there are many concrete steps that can be taken now to close the immigration legal services gap in Illinois and prepare for a successful response to immigration reform in the state. Next steps include:

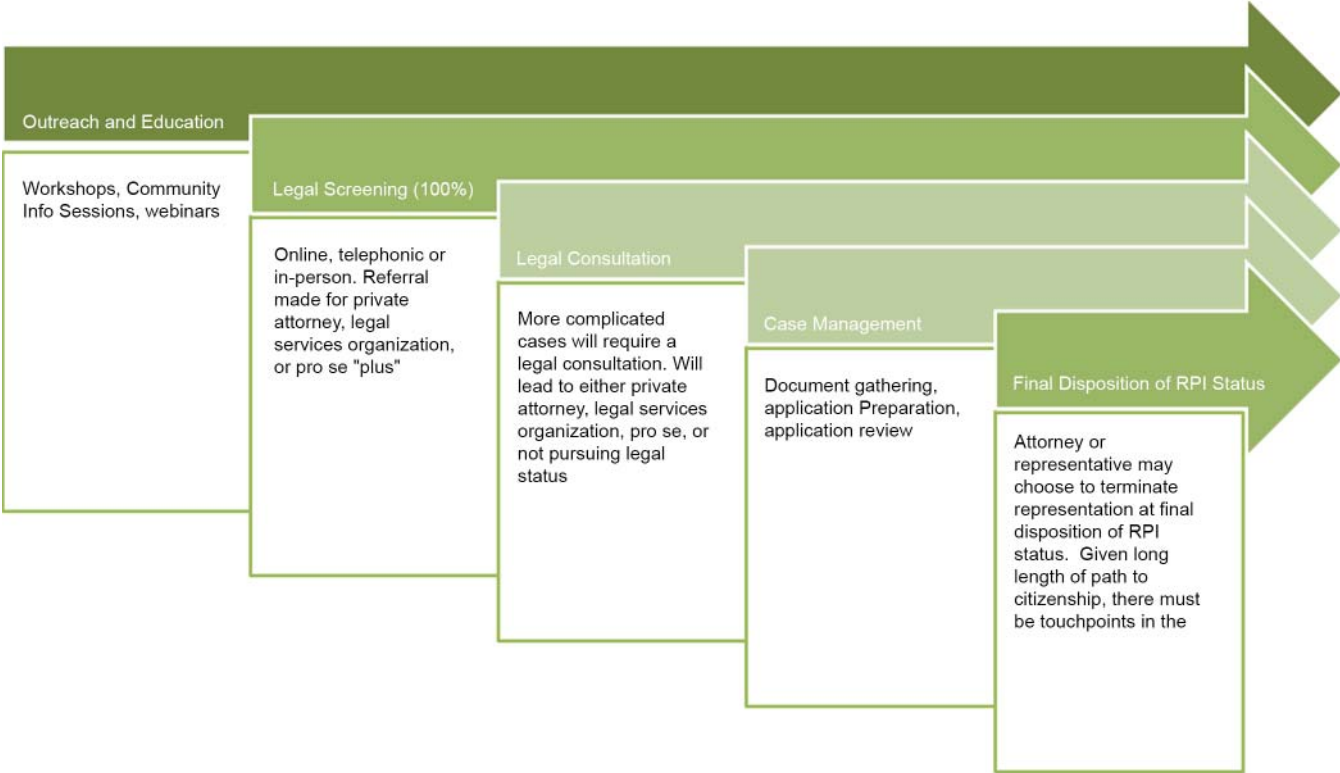
- Implement listserv for IILAC members
- Research and develop a plan for the creation of a statewide website, including identification of information that will be contained on the website, the platform from which the website will operate and the development of protocols for website users
- Explore the feasibility of a statewide phone hotline
- Plan and convene roundtable/webinars on best practices
- Identify resources to respond to technology gaps
- Conduct further analysis regarding each organization's capacity to develop a baseline snapshot of current immigration legal service capacity in Illinois

Each of the recommendations discussed in this report would not only better position immigration legal service providers in Illinois to meet the demand for high-quality immigration legal services following immigration reform, but also would contribute to closing the gap that currently exists. As indicated by Illinois's successful DACA implementation, it is clear that the state's immigration legal service providers, jointly with the public and private sectors, are ready and able to step up to the challenge.

APPENDIX 1: Four Phases of Potential Comprehensive Immigration Reform

PHASE 1	Present time to bill passage	<ul style="list-style-type: none"> - Strengthen individual organizations internally so they are able to expand quickly and responsibly - Expand immigration legal expertise - Invest in technology - Build upon and expand proven service delivery models - Increase partnerships with non-legal entities - Maximize strategic communication and collaboration among Illinois legal service providers - Outreach and education - Finalize organization-level and state-level planning - Raise funds (or build relationships with funders and key stakeholders in preparation for bill passage)
PHASE 2	Bill passage to open RPI application period (1 year from signing of the bill, but may be extended up to 18 additional months)	<ul style="list-style-type: none"> - Outreach and education (including basic information sessions) - Administrative advocacy - Develop plans and materials - Ramp up staffing and space - Begin legal screening, on current and prospective clients - Begin training staff, volunteers, partners - Enforcement and deterrence of fraud - Raise funds
PHASE 3	RPI Application Period (1 year)	<ul style="list-style-type: none"> - Outreach and education - Conduct screening workshops - Hold regular legal services issue roundtables - Administrative advocacy - Training - Screening - Case management - Volunteer recruitment and maintenance - Ongoing enforcement and deterrence of fraud
PHASE 4	13 Year Path to Citizenship	<ul style="list-style-type: none"> - Outreach and education - 6 year mark – applications for extension - Ongoing case management - Ongoing enforcement and deterrence of fraud

APPENDIX 2: Applicant's Path to RPI Status



APPENDIX 3: Immigration Legal Service Providers in Illinois

Name	Office Location(s)
Casa Guanajuato Quad Cities B, D, I	Moline
Catholic Charities of Chicago B, F, I	Des Plaines C Melrose Park Chicago C Waukegan Cicero C
Catholic Charities of Rockford B, F, C, I	Rockford
Centro de Información F, I	Carpentersville Elgin B, D Hanover Park D
Centro Romero B, C, D, I	Chicago
Chicago Irish Immigrant Support I, D	Chicago
Chicago Legal Clinic I	Chicago
Chinese American Service League B, D, I	Chicago
Chinese Mutual Aid Association B, D, I	Chicago
DePaul University College of Law - Asylum and Immigration Clinic D, I	Chicago
Erie Neighborhood House B, D, I	Chicago
Family Focus (Aurora Center) B, C, D, I	Aurora
Frida Kahlo Community Organization B, D, I	Chicago
Hanul Family Alliance I	Chicago, Mundelein Mt. Prospect B
Hispanic American Community Education and Services (HACES) B, I	Waukegan
Hebrew Immigrant Aid Society of Chicago F, D, I	Chicago B Skokie Arlington Heights
Indo-American Center B, D, I	Chicago
Instituto Del Progreso Latino B, D, I	Chicago, Cicero
Iraqi Mutual Aid Society B, D, I	Chicago
Justice for Our Neighbors F, I	Aurora, Chicago C Rockford
Korean American Community Services B, I	Chicago, Prospect Heights
Korean American Resource and Cultural Center B, I	Chicago
Latinos Progresando B, C, D, I	Chicago
Legal Assistance Foundation of Metro Chicago (LAF) B, I	Chicago
Life Span Center for Legal Services and Advocacy B, I	Chicago
Mano a Mano Family Resource Center B, I	Round Lake Park
Muslim Women Resource Center B, I	Chicago
National Immigrant Justice Center B, I	Chicago
Northwestern School of Law - Bluhm Legal Clinic I	Chicago
Pan-African Association B, D, I	Chicago
Polish American Association B, D, I	Chicago
Pui Tak Center B, I, F	Chicago
RefugeeOne B, D, I	Waukegan, Chicago
Rock Valley College B, I	Rockford
The Immigration Project B, I	Bloomington
The Young Center for Immigrant Children's Rights at the University of Chicago I	Chicago
United African Organization D, I	Chicago
World Relief Chicago B, D, F, I	Chicago
World Relief DuPage/Aurora B, D, F, I	Aurora, Wheaton
World Relief Moline B, F, I, D	Moline

Key:

B = Listed by EOIR as BIA-recognized
 F = Faith-based
 D = Member of DePaul College of Law network
 C = CLINIC affiliate
 I = Listed in Immigration Advocates Network directory