

Form I-914-012 Revision Responses to 60-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2006-0059](#)

60-day FRN Citation (federalregister.gov): [88 FR 48488](#)

Publish Dates: July 27, 2023 – Sept 25, 2023

Comment #/Topic	Commenter ID	Comment	USCIS Response
1.		Commenter: jean publieee	
	USCIS-2006-0059-0118	no foreigner should come to this country and be let to just walk right in as the demented biden is doing these days in direct opposition although he is aware that 76% of the citizens of this country don't want this to go on. he cannot continue on this unauthorized since we are to have a govt of the people by the people. open and transparent. but he is sneaky as can be and lies to the american people and works against them constantly. so many of his actions are anti american like bringing in all these foreignners with their criminality, their failure to live up to american laws. they violate our laws constantly. they need to all be sent back to their own country. we will have a lot of repair work to do when Biden leaves office. he is ruining this country. i am totally opposed to this inclusion of the non-immigrants. we need to close our borders. Biden has invited in criminals, ruffians, law breakers, liars.	Response: This comment is out of scope for the intended information collection because it does not provide feedback on the nature of the information collection, the categories of respondents, the estimated burden (i.e. the time, effort, and resources used by the respondents to respond), the estimated cost to the respondent, or the actual information collection instrument.
2.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	See attachment at USCIS-2006-0059-0119	Response: See Comment Responses below labeled with Commenter ID: USCIS-2006-0059-0119 . The commenter provided bulleted suggestions in a letter which GSA posted to the docket as an attachment. The attachment is available at this link USCIS-2006-0059-0119 . Each bulleted suggestion has been separated into different sections in this comment matrix to address each portion of information individually.

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			See Comments 3 - 42.
3.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 1, Part 1, Question 1: I suggest making the radio buttons either/or options, as an applicant has either never filed for T-1 status previously, or they have. Both (A) and (B) cannot both be simultaneously true.	Response: USCIS will review the form field functionality for this question.
4.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 1, Part 2, Question 3 (Physical Address): I suggest a note here or in the instructions that the applicant's complete address does not need to be included, for safety and confidentiality reasons, but that the city and state or zip code are required for biometrics scheduling purposes.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
5.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 1, Part 2, Question 4 (Safe Mailing Address): If "Apt.," "Ste.," or "Flr." is selected, the same is automatically selected for the Law Enforcement Agency on Page 3, Part 3, Question 5.	Response: USCIS will review the form field functionality for this question.
6.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 1, Attorney State License Bar Number: I suggest correcting this field as it does not currently allow numbers.	Response: USCIS will review the form field functionality for this question.
7.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 2, Part 2, Question 8 (Gender): In order to be more inclusive and representative, I suggest updating these options to include a non-binary or other option. The I-914A currently includes "other" as an option.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
8.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 2, Part 3, Questions 2 & 7: I suggest revising as both of these questions address cooperating with	Response: USCIS is not adopting the commenter's suggestions, but may

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		reasonable requests from law enforcement and are therefore partially duplicative.	consider these recommendations during the next revision action to Form I-914.
9.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 4, Part 4: I recommend including a note stating that vacated crimes meeting the Pickering standard—which were vacated due to a substantive, statutory, or procedural defect—do not need to be listed on Form I-914. Many trafficking survivors are forced or coerced into committing crimes as part of their victimization, and state legislatures are increasingly acknowledging forced criminality by enacting vacatur legislation to allow the vacatur of criminal acts for trafficking victims, voiding the earlier judgment. In recognition of the legal error, vacatur also leads to the destruction of the related criminal records. For instance, in California, under Cal. Penal Code § 236.14(k), government agencies are required to seal and destroy such records and there is often no recourse to obtain a copy from the court. Therefore, I suggest that USCIS indicate in this explanation that if a crime has been vacated, additional documentation is unnecessary, and the crime does not need to be listed on Form I-914.	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
10.		Commenter: Carson Osberg	
Form I-914	USCIS-2006-0059-0119	Page 5, Part 4, Question 3D & 4B4: I suggest revising to “one or more individuals.”	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
11.		Commenter: Carson Osberg	

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Form I-914	USCIS-2006-0059-0119	Page 9, Part 7, Interpreter's Contact Information: I suggest including a note indicating where applicants can provide information about additional interpreters used. In cases involving rarer languages, multiple interpreters may be required, such as for interpretation from English to Spanish to an indigenous language, and vice versa. I recommend either allocating space for an additional interpreter or providing guidance on what to include in the "Additional Information" section.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
12.		Commenter: Carson Osberg	
Form I-914A	USCIS-2006-0059-0119	Page 1, Part 3, #3: When completing the T-1's A# here, the derivative A# field on page 2 auto-populates. I suggest correcting this form error.	Response: USCIS will review the form field functionality for this question.
13.		Commenter: Carson Osberg	
Form I-914A	USCIS-2006-0059-0119	Page 2, Part 4, #3 (U.S. Physical Address or Intended Physical Address): I suggest noting here that the derivative applicant's full intended U.S. address does not need to be included for safety and confidentiality reasons.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
14.		Commenter: Carson Osberg	
Form I-914A	USCIS-2006-0059-0119	Page 9, Part 7, Interpreter's Contact Information: I suggest including a note indicating where applicants can provide information about additional interpreters. In cases involving rarer languages, multiple interpreters may be required, such as for interpretation from English to Spanish to an indigenous language, and vice versa. I recommend either allocating space for an additional interpreter or providing guidance on what to include in the "Additional Information" section.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
15.		Commenter: Carson Osberg	
Form I-914A	USCIS-2006-0059-0119	Pages 9-10, Part 7, Interpreter's Contact Information: I suggest	Response: USCIS is not adopting the commenter's

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		including a note indicating where applicants can provide information about additional interpreters. In cases involving rarer languages, multiple interpreters may be required, such as for interpretation from English to Spanish to an indigenous language, and vice versa. I recommend either allocating space for an additional interpreter or providing guidance on what to include in the "Additional Information" section.	suggestions, but may consider these recommendations during the next revision action to Form I-914.
16.		Commenter: Carson Osberg	
Form I-914A	USCIS-2006-0059-0119	Page 11, Part 8 (Preparer's Mailing Address), #3: The field allows no space between the street number and street name. I suggest correcting this form error.	Response: USCIS will review the form field functionality for this question.
17.		Commenter: Carson Osberg	
Form I-914A	USCIS-2006-0059-0119	Page 12, Part 9 (Additional Information): The T-1's name and A# automatically populate here, though the form primarily collects information about the derivative beneficiary. I suggest correcting this.	Response: USCIS will review the form field functionality for this question.
18.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	General: I suggest referencing the USCIS Policy Manual for pro se individuals who are unlikely to be aware of existing guidance regarding T nonimmigrant status. Also suggest providing a link to OVC-funded legal service providers so that unrepresented individuals may attempt to seek free or low-cost representation, which is more efficient and effective for both applicants and USCIS.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
19.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 1, #1(C): I suggest clarifying that the age-based exemption applies to	Response: USCIS is not adopting the commenter's

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		individuals who were under 18 <i>at the time of the trafficking victimization</i> , not at the time of filing Form I-914. (This should also be clarified on page 14.) 3 USCIS-PM B.2.D.5 .	suggestions, but may consider these recommendations during the next revision action to Form I-914.
20.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 1, #2: I suggest clarifying that no I-914A may be filed once the T-1 no longer holds T nonimmigrant status (e.g. it expires or they have adjusted status).	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
21.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 1, #2: I suggest clarifying that age-out protections exist beyond the date of adjudication of the T-1 application, as per the T visa regulations , as this question comes up fairly regularly. For example, if an I-914A is filed after the T-1 has turned 21 and after the I-914 has been granted, the derivative beneficiary still retains eligibility. (This should also be clarified on page 9.)	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
22.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 2, Completing form I-914, Part 1. Purpose for Filing This Application: I suggest revising the following, as I am not clear on its purpose here, since all derivatives must be applied for using Form I-914A: "If you are only filing for a T-6 derivative, you should leave Part A. blank."	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
23.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 2, Part 2. General Information About You, #3: I suggest noting here that the applicant's complete address does not need to be included, for safety and confidentiality reasons, but that the city and state or zip code are required for biometrics scheduling purposes.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
24.		Commenter: Carson Osberg	

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I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 4, Completing Form I-914, Supplement A, Application for Family Member of T-1 Recipient: ○ I suggest clarifying that no I-914A may be filed once the T-1 has adjusted to permanent residence, no I-914A may be filed and no I-914A beneficiary may be admitted into the U.S. in T nonimmigrant status, as this is critical information for a T-1 to be aware of. ○ I suggest revising this language (“must be accompanied by a copy of the principal applicant’s Form I-914”) to state that any I-914A filed after the principal applicant’s I-914 should be filed with a copy of the principal applicant’s T-1 receipt or approval notice. In practice, a full copy of Form I-914 has not been required, and I am concerned that including such a copy could cause confusion by mailroom employees. (This requirement is also mentioned on page 7 of the 4 instructions.) Including a copy of the T-1 receipt or approval notice seems much more relevant in this context than a copy of a form that may or may not have been properly receipted by USCIS, and that may have already been denied.	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
25.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 5, Part 4, Q14: I suggest revising as follows: “Provide your relative’s current status, regardless of how you they entered...”	Response: USCIS is not adopting the commenter’s suggestions, but may consider these

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			recommendations during the next revision action to Form I-914.
26.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 4, Part 7 (Interpreter's Contact Information, Certification, and Signature): I suggest clarifying that no signature is required where phone interpretation is used and instead, the interpreter identification number and name of the interpretation company should be included, where applicable.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
27.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 8, Evidence to Establish T Nonimmigrant Status: I suggest clarifying the language here, as the age-based cooperation exemption applies at the time of trafficking victimization, not the time of filing. Suggested new language: "... unless you were under the age of 18 during any part of your trafficking. " 3 USCIS-PM B.2.D.5 .	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
28.		Commenter: Carson Osberg	
I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 9, Evidence to Establish Derivative T Nonimmigrant Status: I suggest correcting the following sentence as follows: "If you are under 21 years of age at the time you file your application, USCIS will continue to consider your parent or unmarried sibling to have the required qualifying relationship. " As written, the current sentence is unclear as to what "consider" means. Also suggest clarifying that age-out protections exist beyond the date of adjudication of the T-1 application , as per the T visa regulations. For example, if an I-914A is filed after the T-1 has turned 21 and after the I-914 has been granted, the derivative beneficiary still retains eligibility.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
29.		Commenter: Carson Osberg	

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I-914 & I-914A Instructions	USCIS-2006-0059-0119	Page 12, Processing Information: As written, it appears that both T-1 nonimmigrants and T derivatives are authorized to work incident to status. "If your application is approved, you will be authorized to work." Suggest revising that initial sentence and clarifying that only T-1 nonimmigrants are authorized to work incident to status and need not present an Employment Authorization Document, while T derivatives must obtain an EAD. 8 CFR §§ 274a.12(a)(16), (c)(25).	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
30.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 1, Part 2 (Agency Information): The Apt., Ste., or Flr. number field does not accept a response. I suggest correcting this form error.	Response: USCIS will review the form field functionality for this question.
31.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 2, Part 3, Question 3: I suggest revising the following to: "Has the applicant expressed any fear of retaliation or revenge if they had to depart from or were removed from the United States?" Many survivors do not specifically express fears relating to removal, but rather, express fear of return or harm in home country generally.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
32.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 3, Part 3, Question 4: Often, the dates of the criminal activity are a range rather than specific dates. I suggest revising this section so specific dates or a range of dates can be included.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
33.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 3, Part 3, Question 6: I suggest the following: "Provide the date on which the investigation or prosecution was initiated, if applicable." Sometimes an LEA will	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during

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		sign an I-914B even where a formal investigation has not been opened.	the next revision action to Form I-914.
34.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 3, Part 3, Question 7: I suggest the following: “Provide the date on which the investigation or prosecution was completed, if applicable. ” An LEA may sign this form prior to the conclusion of the investigation or prosecution.	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
35.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 3, Part 4, Question 1D: I suggest revising this because the age of majority is relevant to when the trafficking took place, not the age at the time of LE involvement. 3 USCIS-PM B.2.D.5 . I suggest the following language here: “Was under the age of 18 at the time of the trafficking victimization.”	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
36.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 3, Part 5, Question 1: I suggest revising to “Are any of the applicant’s family members believed to have been involved in his or her the applicant’s trafficking to the United States? ” The current language is misleading because there is no requirement that an individual be trafficked to the U.S.; they could already be within the U.S. and trafficked once here, and a family member could be complicit in that trafficking in either scenario. Given that law enforcement is sometimes unfamiliar with trafficking or newer to the nuances of trafficking, I suggest making sure the language in this form and any guidance is clear.	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
37.		Commenter: Carson Osberg	
Form I-914B	USCIS-2006-0059-0119	Page 4, Part 6, Question 2: There is not always both a law enforcement officer and a supervisor of the certifying officer available to sign this	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during

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		form. For example, a unit chief could be both the investigating officer and the certifying official, or a judge may sign the form as the certifying official with the ability to detect trafficking. I suggest clarifying in the form and instructions how to handle in these situations to reduce barriers and encourage the form's use. ○ Additionally, the form language is not entirely consistent with the T Visa Law Enforcement Resource Guide, which could cause confusion and, therefore, reluctance to complete a Form I-914B. On page 4, Form I-914B seeks the signature of the "Law Enforcement Officer," who is referred to in Part 2 (page 1) as the "certifying official," and the "Supervisor of Certifying Officer." The T Visa Law Enforcement Resource Guide states the following, which makes it seem like the supervisor is the one with certifying authority (in contrast to the form language): "Officials With Signing Authority: The supervising official responsible for the detection, investigation, or prosecution of severe forms of trafficking in persons at your law enforcement agency must sign Form I-914B. You are the supervising official of your agency if you are in a supervisory role and your agency has designated you a	the next revision action to Form I-914.
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		“supervising official.” There is also an area designated on the declaration for the signature of a law enforcement officer who is directly familiar with the case.” I would recommend clarification of the form language and accompanying instructions and/or the T Visa Law Enforcement Resource Guide so the information on who must sign and their respective role is clear in both places.	
38.		Commenter: Carson Osberg	
I-914B Instructions	USCIS-2006-0059-0119	Page 1, What is the Purpose of Form I-914 Supplement B?: I suggest citing, as early as possible in the instructions, to the regulations or policy manual language that provides examples of who can sign an I-914B, as well as to DHS’s T Visa Law Enforcement Resource Guide, so that potential certifiers do not have to go digging to ascertain if they are able to sign an I-914B.	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.
39.		Commenter: Carson Osberg	
I-914B Instructions	USCIS-2006-0059-0119	Page 1, When Should I Use Form I-914, Supplement B?: I suggest revising the existing language as follows: “You do not need to formally launch an investigation or file charges to complete Form I-914, Supplement B. You may complete Supplement B if an investigation does not lead to an arrest or a prosecution. Additionally, you may complete Supplement B even if a victim decides to stop cooperating in an investigation or prosecution because they fall under the age-based exemption or trauma-based exception at 8 CFR § 214.11(b)(3). Completing Supplement B is not contingent on the outcome of a	Response: USCIS is not adopting the commenter’s suggestions, but may consider these recommendations during the next revision action to Form I-914.

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		prosecution or investigation. Completing Supplement B is at your discretion. There is no statute of limitations related to completing Supplement B."	
40.		Commenter: Carson Osberg	
I-914B Instructions	USCIS-2006-0059-0119	Page 3, Part 3, 1B: I suggest clarifying the following language: "Sex trafficking where the victim is was under 18 years of age at the time of the trafficking criminal activity. " (This should also be corrected on Page 3, Part 4.)	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
41.		Commenter: Carson Osberg	
I-914B Instructions	USCIS-2006-0059-0119	Page 3, Part 6, Attestation: I suggest clarifying that in some instances, the investigating officer and the certifying supervisor may be the same individual.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.
42.		Commenter: Carson Osberg	
I-914B Instructions	USCIS-2006-0059-0119	Finally, when a new form version is issued, I would strongly urge a minimum of at least 60 days' notice that the edition date is changing and ideally 180 days, as the agency has provided in the past when the I-918 and related forms were expiring, to avoid submission of outdated forms and additional burden on applicants, certifying agencies, legal representatives, and USCIS.	Response: USCIS is not adopting the commenter's suggestions, but may consider these recommendations during the next revision action to Form I-914.