



April 15, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Samantha Deshommes, Chief  
Regulatory Coordination Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW  
Washington, DC 20529-2140

Re: Public Comment Opposing Form G-1530: USCIS Tip Form  
OMB Control Number 1615-NEW  
Docket ID USCIS-2019-0001

Dear Ms. Deshommes:

Whitman-Walker Health (Whitman-Walker or WWH) is submitting these comments in opposition to the Department of Homeland Security, United States Citizenship and Immigration Services proposal to implement the new Form G-1530: USCIS Tip Form, OMB Control Number 1615 - NEW, Docket ID USCIS-2019-0001, published in the Federal Register on February 15, 2019, 84 Fed. Reg. 4518. We submit that the form is unnecessary, wasteful of USCIS resources, and threatens to harm vulnerable individuals and families with unsubstantiated, abusive allegations.

**Interest and expertise of Whitman-Walker Health.** Whitman-Walker Health is a Federally Qualified Health Center providing primary medical care, HIV specialty care, mental health care and substance abuse treatment services, dental care, community health services, youth and family services, and legal services to individuals and families throughout the greater Washington, DC metropolitan area. WWH provides high quality, affirming health care to more than 20,000 individuals annually. Approximately 60% of our patients and clients identify as gay, lesbian, bisexual, or transgender (LGBT). As is to be expected in our diverse, international metropolitan area, significant numbers of our patients and others receiving our health-related services are foreign-born.

Because of our commitment to holistic health care, which includes addressing the legal and social determinants of health, for more than 30 years our in-house Legal Services

Department, with the assistance of hundreds of volunteer attorneys throughout the area, has provided a wide range of immigration-related services to WWH patients and other foreign-born LGBT and HIV-affected individuals and families. Our in-house and volunteer attorneys help immigrant families to file, and successfully pursue, asylum applications; applications for green cards and U.S. citizenship; applications/renewals of protected status under DACA; applications under VAWA and U, T, and SIJS status; and petitions for family reunification. Between staff and volunteer attorneys, our immigration practice is currently handling more than 200 cases.

**Form G-1530 is unnecessary and a wasteful burden on USCIS resources.** The form invites allegations of “immigration fraud” that will frequently, if not mostly, be submitted anonymously, with little or no substantiation. Although the form allows individuals to identify themselves and provide contact information, and to offer details of their allegations, this is not required, and USCIS itself anticipates that most people using the form will spend very little time completing it – less than 10 minutes (0.166 hours – 84 Fed. Reg. at 4519). The agency will almost certainly be inundated with allegations that will be time-consuming to investigate and unlikely to produce actual instances of fraud. (The Federal Register notice estimates 55,000 reports – *id.*) There already are ample ways for federal immigration authorities to receive allegations of fraud; Form G-1530 itself enumerates already-established ways to provide such reports. Moreover, USCIS procedures already involved careful evaluation of petitioners’ claims. This new form is very unlikely to advance those efforts significantly. It would, however, likely cause considerable harm to immigrant individuals and families.

**Form G-1530 would invite unsubstantiated allegations that would harm innocent immigrants and invite abuse.** The form would threaten immigrants with valid claims – and even many individuals and families whose claims already have been determined to be valid and meritorious – to allegations that could disrupt their lives, harm their reputations, jeopardize their jobs and cause significant financial and other hardship. Many immigrants, even those with legal standing or valid claims, are threatened by abusive partners, employers and others with unsubstantiated allegations lodged with immigration authorities, as a way to maintain their control and exploitation. This is a particular concern for many in the current climate, in which immigrants are subjected to pervasive suspicion regardless of their actual legal standing. LGBT immigrants, and those living with HIV, are particularly vulnerable; many of them have fled persecution in their countries of birth, and were raised in societies in which their sexuality, gender identity or medical condition were heavily stigmatized. Many still live in communities in which their sexual and gender identities or HIV status remain stigmatized.

**Form G-1530 conveys a stigmatizing, anti-immigrant message that corrodes the intent of our immigration laws.** The form conveys a message that immigration claims are presumptively fraudulent. This undercuts the intent of our immigration system, which is to

protect and encourage a diverse society enriched by many cultures, and to enhance our nation's tradition of providing refuge for individuals and families fleeing persecution abroad. We agree that USCIS must administer our laws fairly and enforce their limits, which includes ensuring that claims are well founded and not fraudulent. However, the agency already is carrying out this mandate, and there is no justification for broadcasting a corrosive message of suspicion that unfairly targets all immigrants.

**Conclusion.** For all of these reasons, Form G-1350 should be withdrawn.

Respectfully submitted,

A handwritten signature in cursive script that reads "Daniel Bruner". The signature is written in dark ink and is positioned above the typed names of the signatories.

Daniel Bruner, Senior Director of Policy  
Amy Nelson, Director of Legal Services  
Denise Hunter, Staff Attorney  
Connor J. Cory, Staff Attorney