











AMERICAN  
IMMIGRATION  
LAWYERS  
ASSOCIATION

COVID-19 pandemic to be per se “extraordinary circumstances.” Many legal and social services offices are closed. Asylum seekers often need evaluations by medical and mental health professionals, and these professionals should be focusing on issues related to the pandemic at this time.

3. **Exercise Discretion to Allow Initial Evidence to be Submitted After Filing:** USCIS must exercise its discretion under 8 CFR 103.2(b)(8)(ii) to allow initial evidence that was not available at the time of filing due to the national emergency to be submitted in response to a request for additional evidence.

We thank you for your consideration and look forward to hearing from you at your earliest convenience. If you require any additional information and should you have any questions, please do not hesitate to contact Sharvari (Shev) Dalal-Dheini, Director of Government Relations at (202) 507-7621 or by email at [sdalal-dheini@aila.org](mailto:sdalal-dheini@aila.org).

Sincerely,

THE AMERICAN IMMIGRATION LAWYERS ASSOCIATION

cc: Joseph Edlow, Deputy Director for Policy, USCIS  
Kathy Nuebel Kovarick, Chief of Staff, USCIS  
Tracy Renaud, Associate Director, Service Center Operations Directorate  
Daniel Renaud, Associate Director, Field Operations Directorate  
Kathryn Rexrode, Associate Director, External Affairs Directorate, USCIS  
Michael Dougherty, Ombudsman, Office of the Citizenship and Immigration Services  
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Stacy Shore, Acting Deputy Ombudsman, Office of the Citizenship and Immigration Services  
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Elissa McGovern, Chief of Policy, Office of the Citizenship and Immigration Services  
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