



TENNESSEE  
**Immigrant  
& Refugee  
Rights**  
COALITION

## **EXHIBIT A-1**

### **Expanding Critical Immigration Legal Services in Davidson County Metro Grant Award RS 2022-1560 and RS 2022-1831 Proposed Modifications 11/22/23**

As explained in the original proposal for ARP support, Nashville has historically been an immigration legal services desert. The need for high-quality, low-cost immigration legal services has long outstripped local nonprofit capacity to meet it. TIRRC put together an ambitious proposal designed to respond to the pressing legal needs in immigrant communities we have long seen in our grassroots outreach work. The proposal represented something of an experiment, because it was the first time TIRRC sought to translate its community-based relationships, presence and visibility into the delivery of legal resources and services at scale. It contemplated using innovative community-based methods - such as the development of a large volunteer base, a reliance on non-attorney navigators, and the dissemination of legal information through Know Your Rights sessions and clinics - to deliver legal resources and advice to a large number of individuals.

We have learned over the past fifteen months that the need for immigration legal services in Nashville is not just widespread, but also deeper than we anticipated. The arbitrariness and complexities of the immigration legal system limit community members' ability to navigate it successfully without intensive, individualized, ongoing assistance from experienced immigration practitioners. We also learned that experienced immigration practitioners are scarce; it is very difficult to recruit and retain them, especially at nonprofit salaries.

In light of what we've learned over the past year and a half, the challenges we have faced in staffing our program, and the recommendations our new legal director has shared, we seek to modify proposal deliverables in three key ways:

- The number of clients served through consultations and screenings
- Our approach to training and engaging volunteers
- Our approach to and the scale of Know Your Rights sessions

#### **Number of clients served via consultations and screenings:**

We originally estimated that the enhanced capacity generated by this grant would allow us to conduct 1200 consultations and screenings, with legal filings as needed "depending on case details and staffing." As it turns out, most of the clients to whom we have provided

consultations require ongoing legal representation to resolve their immigration status or to become naturalized citizens. We have endeavored to provide ongoing legal representation to legal consultation clients so that we can help ensure that they are able to acquire or maintain immigration status, or become citizens. Our provision of ongoing case representation to a substantial number of clients has limited the number of legal consultations and screenings we can provide.

As such, we propose modifying the deliverable relating to consultation/screenings and follow-up services as follows:

- We estimate that we will serve at least 600 clients with consultations/screenings over the grant period. We will provide ongoing case representation (such as representation in naturalization, DACA, and adjustment of status applications) and/or assistance with administrative immigration filings (such as changes of address, applications to replace green cards, and inquiries about immigration records) to at least 200 of these clients.

The modification of this deliverable makes sense given the vast differences in staff time required to carry out a consultation versus representing a client through the life of a case. Whereas a legal consultation can be accomplished in 1-2 hours of legal staff time, ongoing case representation for a single client can take anywhere from 5-30 hours. We believe our shift to providing ongoing representation has been worthwhile because it enables most of those individuals who receive it to become citizens or acquire an immigration status adjustment.

### **Volunteer training and capacity:**

In the original proposal, we put forward a plan to develop volunteer capacity to assist with immigration legal services. The plan included stewarding 6-10 volunteers to qualify for, apply for and receive DOJ accreditation after at least 1 year of volunteer support; training 10-20 volunteers monthly in year 2, and hosting a 40-hour COIL training in years 1 and 2.

We propose revising these plans as follows:

- We intend to support 2-3 qualified volunteers on their path towards DOJ accreditation; we will continue to train volunteers who participate in our clinics, but will not seek to train a monthly cohort outside of our clinics; and we will forgo the COIL training in year 2.

While scaling back the community volunteer plans, we intend to instead invest staff resources in conducting trainings/CLEs for local attorneys on immigration law issues and on issues relating to the intersection of immigration and other areas of law (eg, family, employment, housing). We anticipate conducting 3 such trainings/CLEs for attorneys before June 2024.

We learned from our COIL training last year that immigration law is so complex it is difficult for volunteers to master it at the level required to acquire DOJ accreditation. Moreover, we've seen that a number of local attorneys who are not familiar with immigration law have an interest in learning it and that there is particular interest in the intersections of immigration and other areas of law as they affect low-income clients. Building capacity and familiarity with immigration law within the local bar will help expand a pool of pro bono attorneys willing to take pro bono cases for immigrants who need assistance.

**Modifying our approach to Know Your Rights (KYR) sessions:**

In our original proposal, we estimated that we would host 30 sessions per year, or 60 sessions total. While we have reached a number of community members with information about our legal services through events and media outreach, our reduced staffing capacity has meant that we have not been able to host as many KYR sessions as we anticipated. Additionally, we have learned that in order to be most beneficial to community members, each KYR session should be as detailed, specific, and customized as possible to the audience. For example, the legal information recently-arrived asylum seekers who are in immigration court proceedings need is very different from the legal information long-standing residents who hold DACA status need.

We would like to reduce the number of KYR sessions we will carry out in order to ensure we have staff capacity to develop tailored, high-quality programs for different sectors of the immigrant community. We estimate that we will host 30 total sessions over the grant period.