

COUNTRY OF ORIGIN INFORMATION DOCUMENTATION CENTER WHITE PAPER

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Adjudicators, including asylum and refugee officers from United States Citizenship and Immigration Services (USCIS) and immigration judges from the Executive Office of Immigration Review (EOIR), rely on country-of-origin information (COI) to assess asylum claims. Currently, however, decisionmakers often lack the detailed, accurate and timely COI necessary to decide asylum claims accurately and efficiently. In 1998, Congress recognized the importance of COI, establishing in 8 U.S.C. § 1157(f) a statutory requirement that the Attorney General provide adjudicators with “country-specific conditions” information.¹ 8 C.F.R. § 208.1(b) mandates that the Associate Director of the USCIS Refugee, Asylum, and International Operations (RAIO) “compile and disseminate to asylum officers information concerning the persecution of persons in other countries . . . , torture of persons in other countries, and other information relevant to asylum determinations,” and “maintain a documentation center with information on human rights conditions.”² The statute and regulations aimed to create a library of detailed, accurate and timely COI that would be accessible to asylum and refugee adjudicators.³ Due to insufficient resources, the COI currently available to adjudicators falls short of that goal.

This proposal presents a legal argument and framework for US policymakers to allocate funding to USCIS to increase resources, including staff, at the Research Branch of the Statelessness, TRIG, and Research Division of RAIO (RAIO Research) and maintain the COI documentation center mandated by §208.1(b). Section 1 outlines the background and purpose of §208.1(b). Section 2 describes the approach taken by two peer nations, Canada and the United

¹ 8 U.S.C. § 1157(f) provides:

(f) Training

(1) The Attorney General, in consultation with the Secretary of State, shall provide all United States officials adjudicating refugee cases under this section with the same training as that provided to officers adjudicating asylum cases under section 1158 of this title.

(2) Such training shall include country-specific conditions, instruction on the internationally recognized right to freedom of religion, instruction on methods of religious persecution practiced in foreign countries, and applicable distinctions within a country between the nature of and treatment of various religious practices and believers.

This provision was added to the Immigration and Nationality Act as part of the International Religious Freedom Act of 1998, 112 Stat. 2812; Pub. L. 107–208, § 5 (Oct. 27, 1998).

² 8 C.F.R. § 208.1(b) provides in full:

(b) Training of asylum officers. The Associate Director of USCIS Refugee, Asylum, and International Operations (RAIO) shall . . . in cooperation with the Department of State and other appropriate sources, *compile and disseminate to asylum officers information concerning the persecution of persons in other countries* on account of race, religion, nationality, membership in a particular social group, or political opinion, torture of persons in other countries, and other information relevant to asylum determinations, and shall maintain a documentation center with information on human rights conditions. *Id.* (emphasis added).

See also Asylum Officer Training, 55 Fed. Reg. 30676 (Immigr. & Naturalization Serv. July 27, 1990) (to be codified at 8 C.F.R. pt. 208.1) [hereinafter Asylum Officer Training, 55 Fed. Reg. 30676] (“a documentation center shall be maintained for the collection and dissemination of information on human rights conditions.”).

³ *Id.*

Kingdom, through their adjudication documentation centers that provide detailed, timely, accurate, and reliable COI. Section 3 sets forth recommendations to policymakers to allocate the necessary funds to (i) increase staffing within RAIO Research; (ii) increase accessibility of existing country conditions information through a centralized COI documentation center; and (iii) consider forming an Independent Quality Assurance Board to ensure that the resources available to RAIO Research are sufficient to meet statutory and regulatory COI requirements.

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I. BACKGROUND ON THE COI DOCUMENTATION CENTER

In 1980, Congress passed the Refugee Act, which created a statutory basis for asylum in the United States and directed the Attorney General to establish a procedure to assess asylum claims.⁴ In 1991, the Immigration and Naturalization Service, whose relevant functions have been subsumed by USCIS, promulgated a framework of regulations directing the implementation of “a comprehensive and uniform asylum policy and procedure” that comported with the Refugee Act of 1980.⁵ The Executive Branch was guided by “the essential need for an orderly and fair system for the adjudication of asylum claims.”⁶

These regulations required the establishment of a COI documentation center in order to “aid Asylum Officers to maintain *current knowledge* of country conditions around the world.”⁷ The creation of the COI documentation center “address[ed] criticism and concerns that asylum adjudicators relied on their own subjective concepts of country conditions in refugee-producing countries, or relied exclusively on reports motivated by foreign policy considerations.”⁸ The COI documentation center also mirrored the development of asylum adjudication processes in other countries such as Canada.⁹

The first version of 8 C.F.R. §208.1 specified that the compilation and dissemination of country conditions should be “an ongoing component of the training” required for asylum officers. The original version of §208.1 used the words “current knowledge” and “ongoing” to reflect asylum officers’ need for up-to-date COI.¹⁰ As emphasized in the USCIS Asylum Officer Training Manual, “[i]t is imperative to consult COI routinely, even when you believe that you are familiar with the current situation in a country. Conditions in many countries are often volatile and subject to rapid change.”¹¹

The USCIS’ asylum officer training manual also underscores the importance of COI in ensuring accurate and efficient adjudication, stating that “COI helps . . . elicit relevant information and form reasoned decisions” and “helps promote consistency.”¹² COI is indispensable for asylum

⁴ Refugee Act of 1980, Pub. L. No. 96-212, 94 Stat. 102 (1980). § 208(a).

⁵ Asylum Officer Training, 55 Fed. Reg. 30676, *supra* note 3.

⁶ *Id.*

⁷ *Id.* (emphasis added).

⁸ INS, ASYLUM OFFICER BASIC TRAINING: COUNTRY CONDITIONS RESEARCH AND THE COIRS 1 (2009), Westlaw 2009 WL 4566262 [hereinafter INS ASYLUM OFFICER BASIC TRAINING].

⁹ Asylum Officer Training, 55 Fed. Reg. 30676, *supra* note 3. (“The creation of a documentation center . . . also reflects recent developments in the methods used to aid in the adjudication of asylum cases in other countries, such as Canada.”).

¹⁰ *Id.*

¹¹ U.S. CITIZENSHIP & IMMIGR. SERV., RAIO DIRECTORATE – OFFICER TRAINING: RESEARCHING & USING COUNTRY OF ORIGIN INFORMATION IN RAIO ADJUDICATIONS: TRAINING MODULE 11 (2019) [hereinafter RAIO COI TRAINING], https://www.uscis.gov/sites/default/files/document/foia/COI_LP_RAIO.pdf.

¹² *Id.* at 10–11.

officers to “[a]sk questions to fully develop the interviewee’s claim,”¹³ “[e]valuate the objective or factual basis of the claim and eligibility,” and “[a]ssess credibility.”¹⁴ These statements are consistent with the purpose of 8 C.F.R. § 208.1—creating an “orderly and fair system for the adjudication of asylum claims.”¹⁵

Though detailed, timely, and reliable COI is crucial for an accurate and efficient asylum adjudication system, the current COI offerings at the asylum offices and immigration courts are inadequate.

A. History of USCIS COI Documentation Center

Pursuant to 8 C.F.R. § 208.1(b), RAIO initially created the Resource Information Center (RIC).¹⁶ The RIC performed two main tasks: (1) answering queries from adjudicators; and (2) compiling COI to disseminate to asylum officers. RAIO also created the Asylum Virtual Library, which contained country-specific databases, as well as articles and reports offering reliable country conditions information.¹⁷

The RIC was later reestablished as the Country-of-Origin Information Research Section (COIRS). COIRS introduced a regional structure, assigning researchers to a specific geographic region to collect and disseminate COI and to conduct COI trainings for adjudicators.¹⁸

B. RAIO Research Today

In 2010, RAIO created the incumbent Research Unit which subsumed COIRS. RAIO Research serves not only RAIO, but USCIS more broadly, providing research services to eleven asylum offices, refugee officers, immigration service centers, field offices, the Office of Policy and Strategy, the Fraud Detection and National Security Directorate (FDNS), and more. Staff in the Research Unit perform the following core tasks:

- Collecting information about assigned regions from a wide variety of sources;
- Disseminating information to the field through training, papers, query responses, and other work products; and
- Conducting field trainings on COI and research techniques.¹⁹

¹³ *Id.* at 11.

¹⁴ *Id.* at 11.

¹⁵ Asylum Officer Training, 55 Fed. Reg. 30675, *supra* note 3.

¹⁶ INS ASYLUM OFFICER BASIC TRAINING, *supra* note 12, at 5.

¹⁷ *Id.* at 7.

¹⁸ *Id.* at 5.

¹⁹ RAIO COI TRAINING, *supra* note 14, at 20.

For questions involving legal issues, RAI0 Research coordinates with the Law Library of Congress Foreign Law Specialists who provide foreign and legislative information services upon request.²⁰

The Research Unit consists of twelve researchers that are delegated as follows:

- Two researchers for the Middle East and North Africa;
- Two researchers for East and South Asia;
- Two researchers for Europe and Central Asia;
- Two researchers for Sub-Saharan Africa;
- Three researchers for Latin America and the Caribbean;
- One researcher for the Horn of Africa;

In addition, RAI0 Research houses the Research Division Chief and a Management and Program Analyst.

These staffing levels are inadequate to meet the demands of the job. At most recent count, there were 760 asylum officers and 290 refugee officers, or one researcher for 87 officers.²¹ RAI0 Research also fields requests for COI from other parts of USCIS, including Service Centers, Field Offices, and FDNS. These requests include country conditions reports for the Office of Policy and Strategy which relies on them to make TPS determinations as well as research for senior leadership in RAI0 and USCIS. Moreover, each researcher is responsible for creating and updating country conditions information for and conducting trainings on a large number of countries. Because RAI0 Research faces very high demand for its work and insufficient knowledge management resources, their shortfalls in staffing prevent them from providing in a timely way the country conditions research needed by asylum adjudicators to decide asylum claims accurately and efficiently. By way of comparison, the Immigration and Refugee Board of Canada (IRB) employs approximately fifty to sixty researchers.

C. EOIR and State Department COI

In addition to USCIS resources, asylum adjudicators rely on COI furnished by the State Department.²² However, State Department COI reports are alone insufficient to evaluate most asylum claims. The State Department provides COI through its annual “Country Reports on Human Rights Practices,” or “Human Rights Reports.” These reports contain a factual record of

²⁰ *Id.*

²¹ 769 asylum officers as of September 2023. Asylum Quarterly Engagement Fiscal Year 2023, Quarter 4 Talking Points (Sept. 19, 2023), available at <https://www.uscis.gov/sites/default/files/document/outreach-engagements/AsylumQuarterlyEngagement-FY23Quarter4PresentationTalkingPoints.pdf> 290 refugee officers as of November 2022. USCIS Refugee Processing Quarterly Engagement (Dec. 7, 2022), available at https://www.uscis.gov/sites/default/files/document/outreach-engagements/Refugee_Processing_Quarterly_Engagement.pdf

²² In fact, in RAI0’s COI training manual, adjudicators are explicitly directed to use State Department reports. RAI0 COI TRAINING, *supra* note 14, at 21 (“You should use only public sources, as opposed to sensitive or classified information, when citing COI [including] . . . Government reports (e.g., U.S. Department of State)”).

human rights violations that occurred in 198 countries in the prior year.²³ The State Department’s Bureau of Democracy, Human Rights, and Labor (DRL) oversees the creation of such reports, relying on officials working in U.S. embassies abroad. Following DRL guidance, these officials create draft reports for the country in which they work.²⁴ DRL staff then edit those reports, consulting with other offices within the State Department.²⁵ The Human Rights Reports offer a useful starting point, but are generally not sufficiently detailed to assess individual asylum claims. At worst, these reports may be politicized in ways that render them unreliable.²⁶

EOIR also provides COI through its Law Library and Immigration Research Center online “Country Pages” database.²⁷ EOIR’s Country Pages are inconsistent in the breadth of information they provide for each country. Country Pages are also not updated frequently. Each Country Page contains links to public sources providing information on that country’s COI.²⁸ Sources are divided into two categories, human rights reports and topical listings, and include reports generated by the U.S. government, foreign governments, non-governmental organizations, and the media. Topical listings vary significantly depending on the country, but generally include gender, children, corruption, medical availability, sexual orientation, and religion. Some countries do not have any topical listings.²⁹ Given that RAIO Research maintains its own country pages offering sources of COI tailored to the issues seen by refugee and asylum officers in their caseloads, RAIO officers have little incentive to rely on EOIR’s Country Pages. Given that EOIR’s Country Pages are essentially replicating the work of RAIO Research, they appear to be an inefficient duplication of efforts.

II. CASE STUDIES: COI DOCUMENTATION CENTERS IN CANADA AND THE UNITED KINGDOM

Canada and the United Kingdom have developed successful programs to conduct, compile, and disseminate COI. These countries’ COI programs lend useful insight into how the U.S. COI system’s model and staffing might be improved. Indeed, the Executive Branch intended that the U.S. COI system “reflect” the Canadian approach.³⁰

²³ 2021 Country Reports on Human Rights Practices: Preface, U.S. DEP’T OF STATE, Mar. 20, 2023, <https://www.state.gov/reports/2022-country-reports-on-human-rights-practices>.

²⁴ MICHAEL A. WEBER, CONG. RSCH. SERV., IF10795, GLOBAL HUMAN RIGHTS: THE DEPARTMENT OF STATE’S COUNTRY REPORTS ON HUMAN RIGHTS PRACTICES (2022), <https://sgp.fas.org/crs/row/IF10795.pdf>.

²⁵ *Id.*

²⁶ *See, e.g., Gramatikov v. INS*, 128 F.3d 619, 620 (7th Cir. 1997) (noting concerns the State Department downplays human rights’ violations by governments it seeks to have friendly relations with).

²⁷ *EOIR: Country Conditions Research*, DOJ, <https://www.justice.gov/eoir/country-conditions-research> (last visited Mar. 22, 2023).

²⁸ *Id.* As of March 2023, there are Country Pages for 192 countries. *Id.*

²⁹ For example, Mozambique has no topical listings. *EOIR: Country Conditions Research: Mozambique*, DOJ, <https://www.justice.gov/eoir/country/mozambique-topical> (last updated Mar. 21, 2023).

³⁰ Asylum Officer Training, 55 Fed. Reg. 30676 (Immigr. & Naturalization Serv. July 27, 1990) (to be codified at 8 C.F.R. pt. 208.1) (“The creation of a documentation center . . . also reflects recent developments in the methods used to aid in the adjudication of asylum cases in other countries, such as Canada.”).

A. Canada: Immigration and Refugee Board of Canada

The Immigration and Refugee Board of Canada (IRB) is responsible for the adjudication of asylum claims in Canada.³¹ The Immigration and Refugee Protection Act has been interpreted to allow the decision-maker of the Refugee Protection Division and the Refugee Appeal Division to request country-of-origin information.³² Adjudicators may request general and specific information related to an individual asylum claim from the IRB's Country-of-Origin Research Unit (as explained further below).³³

To ensure uniformity of research across the three main IRB offices, country conditions research is centralized in the Research Directorate, which handles all COI-related research requests.³⁴ The Research Directorate's objective is to provide reliable COI and claimant-specific information to support more accurate decisions by the Refugee Protection Division and the Refugee Appeal Division.

The IRB Research Directorate has three units: the Country-of-Origin Research Unit; the Knowledge and Management Information Unit; and the Specific Information Research Unit.³⁵ Through these units, the Research Directorate furnishes: (1) Responses to Information Requests (RIRs), which are claimant specific answers to discrete questions relating to refugee status; (2) National Documentation Packages (NDPs) on general country conditions; and (3) Supplemental Country of Origin Information (SCOI).³⁶

a) Responses to Information Requests (RIRs)

RIRs are detailed reports prepared by the Country-of-Origin Research Unit in response to specific requests made by the decision-makers within the Refugee Protection Division and the Refugee Appeal Division. (These are equivalent to Query Responses provided by RAIO Research. Moreover, the IRB's RIRs are often included on RAIO's Country Pages.) Decisionmakers can request both general and specific information needed to resolve a central issue, usually specific

³¹ *Immigration and Refugee Board of Canada*, available at <https://www.irb-cisr.gc.ca/en/Pages/index.aspx>

³²

³³ *Id.* ¶ 3.7. As an administrative tribunal, the IRB has flexible rules of procedure in the interest of administering fair and quick hearings. Immigration and Refugee Protection Act, S.C. 2001, c. 27 § 162(2). The Immigration and Refugee Protection Act allows the Refugee Protection Division of the IRB to conduct hearings without being bound by conventional rules of evidence, enabling the Refugee Protection Division to receive and consider off-the-record information in its decisions. *Id.* § 170(g), (h). In guidelines issued by the chairperson of the IRB, these provisions have been interpreted to allow the decision-maker of the Refugee Protection Division and the Refugee Appeal Division to request country-of-origin information. *Chairperson Guidelines 7: Concerning Preparation and Conduct of a Hearing in the Refugee Protection Division*, IMMIGR. & REFUGEE BD. OF CANADA (last modified Dec. 15, 2012) [hereinafter *Chairperson Guidelines*], <https://tinyurl.com/yfytgxno>.

³⁴ YOULIANA DASKALOVA & HEIDI SPRUNG, RESEARCH DIRECTORATE, THE RESEARCH DIRECTORATE AND COUNTRY OF ORIGIN INFORMATION (Nov. 23, 2016), <https://tinyurl.com/yjqrmtd4>.

³⁵ *Id.* at 4.

³⁶ Information on Supplemental COI Packages could not be found on the Board's website or elsewhere.

factual issues, in the case.³⁷ The finished reports are made publicly available on the IRB website under its dedicated COI section.³⁸ Older RIRs are saved on UNHCR's Refworld site, and newer RIRs are saved in the European Country of Origin Information Network.³⁹ RIRs are cataloged by country and date of entry and are titled by the question(s) that prompted each request.⁴⁰

RIRs are usually produced within five to fifteen days to avoid delays to the hearing for which they are prepared. RIRs source information from publicly available resources, contacts within foreign governments, international human rights organizations, media, and even individuals willing to appear and be cited in a public document.⁴¹ The Chairperson Guidelines concerning the preparation and conduction of an asylum hearing specify that these additional requests for information shall be made only where time permits and where the Refugee Protection Division considers the information necessary to decide the case and unobtainable otherwise.⁴²

Decision-makers must consider the following factors before requesting additional information (as set out in provision 3.3 of the Instructions for Gathering and Disclosing Information for Refugee Protection Division Proceedings):

- whether the information is needed to resolve an issue central to the case;
- likelihood that information can be acquired;
- whether obtaining the information will cause delays;
- whether there is a serious possibility that another person will be endangered through the gathering of the information; and
- whether the method for gathering the information complies with the Privacy Act.⁴³

Decision-makers must also ensure their request forms contain the following information:

- a description of the information required;
- specific sources to consult for the information;

³⁷ *Instructions for Gathering and Disclosing Information for Refugee Protection Division Proceedings*, IMMIGR. & REFUGEE BD. OF CANADA (last modified Dec. 15, 2012) [hereinafter *Instructions for Gathering and Disclosing Information*], <https://tinyurl.com/yjczjs39>.

³⁸ *See Responses to Information Requests*, IMMIGR. & REFUGEE BD. OF CAN. (last visited Mar. 22, 2023) [hereinafter *Responses to Information Requests*] <https://irb.gc.ca/en/country-information/rir/Pages/index.aspx>.

³⁹ <https://www.ecoi.net/>

⁴⁰ For example, the most recent report on Cameroon is titled "Situation and treatment of single women and women who head their own households, including their ability to live on their own and access housing, income, education, health care, and support services, particularly in Douala and Yaoundé; impact of COVID-19." *Responses to Information Requests: Cameroon*, IMMIGR. & REFUGEE BD. OF CAN. (last visited Mar. 22, 2023), <https://irb.gc.ca/en/country-information/rir/Pages/index.aspx?doc=458612&pls=1>.

⁴¹ DASKALOVA & SPRUNG, *supra* note 41, at 11.

⁴² *Chairperson Guidelines*, *supra* note 39.

⁴³ *Instructions for Gathering and Disclosing Information*, *supra* note 44.

- the purpose and method for obtaining the information;
- time required to retrieve the information; and
- the estimated costs of obtaining the information, where known.⁴⁴

Once the draft request form has been prepared, the decision-maker's adjudicative support team promptly submits copies of the draft to both parties who must then review the drafts and return their written consent, and any objections and comments, within five business days of receipt.⁴⁵

At the end of the review period, the request form and the parties' comments, objections, and consent form are presented to the decision-maker for a final review.⁴⁶ This is an opportunity for the decision-maker to review the comments and objections to the request form before it is submitted by email to the Research Directorate. Where the claimant does not consent to the request for information, the decision-maker may still proceed with the request provided that the sources listed do not require consent before disclosing personal information. If the claimant objects to the acquisition of information, the decision-maker may alter the request to conform to the claimant's objections or proceed without changes. Decision-makers must consider the particular risk factors listed in provision 3.3 above before proceeding without changes. The decision-maker may still cancel the request at this point if, in light of the parties' comments and objections, she considers the factors listed in provision 3.3 are not met. In the event of cancellation, a copy of the request form and the decision-maker's comments must be tendered to the parties.⁴⁷

Once the results of the request are received from the Research Directorate, both parties are promptly informed and furnished copies for comments to be submitted either before the next hearing date or on a date assigned by the decision-maker.⁴⁸ The decision-maker may still withhold the results of the investigation if she determines that disclosure to the parties will lead to the endangerment of any person's life, liberty, or security. If the parties' responses are not received by the anticipated response time, the value of the information may be reassessed by the decision-maker and the request canceled.⁴⁹

b) National Documentation Packages (NDPs)

NDPs are a selection of documents and links containing country conditions information; they are equivalent to RAIO Research's Country Pages. The Research Directorate, through the Knowledge and Information Management Unit, produces NDPs for all countries from which refugee applicants arrive. NDPs are updated regularly so that decision-makers can refer to the

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.*

most current country conditions information to analyze the claimant's risk of persecution. NDPs are publicly available on the IRB's webpage.

The existence of an entire unit focused on knowledge management sits in stark contrast to RAI0 Research, which requires its researchers to perform a range of additional functions, including research and training, on top of knowledge management. These multiple responsibilities of RAI0 Research staff could be a full-time job, as the IRB's structure demonstrates. Moreover, many members of the RAI0 Research staff are not specialists in knowledge management. RAI0 Research as a whole has not been provided with the technology needed to share their work effectively.

NDPs differ from Responses to Information Requests in several respects. For instance, in every proceeding before the Refugee Protection Division, NDPs are used as the standard source of COI, and decision-makers disclose this fact to the parties. The policy objective behind this is to ensure uniformity and fairness; regardless of the applicant's resources, each applicant's claim is decided according based on a minimum amount of reliable and detailed COI.⁵⁰ Prior to any hearing, the Refugee Protection Division is required to provide the parties with information on how to access the NDP reports.⁵¹ The NDP provided at the hearing is included in the record for appellate review. The Refugee Appeal Division may also request a more recent NDP and rely on both the latest NDP and the NDP on which the parties relied during their hearing before the Refugee Protection Division.⁵²

Because NDPs are considered as a source of general, baseline COI, each follows a uniform structure and addresses the same topics in the same order.⁵³ For example, each NDP contains information on general geography; human rights issues; identification documents and citizenship requirements; political activities and organizations; gender, domestic violence, and children; sexual minorities; criminality and corruption; military service; judicial legal and penal systems; law enforcement; media reforms; religion; nationality and ethnicity; freedom of movement; and labor, employment, and unions.⁵⁴ Additionally, a specific request for information can be included in an NDP if the Response to Information Request pertains to a central, common aspect of the claims originating from a specific country or an area in the country.

⁵⁰ *Policy on National Documentation Packages in Refugee Determination Proceedings: Policy Statement*, IMMIGR. & REFUGEE BD. OF CANADA (June 5, 2019) [hereinafter *National Documentation Package Policy Statement*], <https://tinyurl.com/yf5v7ls>.

⁵¹ Refugee Protection Division Rules, SOR/2012-256 § 33(2) (Can.).

⁵² *National Documentation Package Policy Statement*, *supra* note 59.

⁵³ DASKALOVA & SPRUNG, *supra* note 41, at 24.

⁵⁴ *Id.* at 23.

B. United Kingdom: The U.K. Home Office

The U.K. Home Office is the United Kingdom’s ministerial department responsible for immigration, counterterrorism, and crime.⁵⁵ U.K. Visas and Immigration, an executive agency of the Home Office, processes asylum applications.⁵⁶ The agency is governed by the U.K. Borders Act of 2007,⁵⁷ which requires the Independent Chief Inspector of Borders and Immigration⁵⁸ to collect information about the conditions in countries outside the United Kingdom for use by immigration officials.⁵⁹ The Country Policy Information Team (CPIT), a group of trained researchers, is responsible for collecting and publishing the country conditions information.⁶⁰

As of May 2017, CPIT consisted of seventeen full-time employees,⁶¹ including one Head of Unit, two Team Managers, and several Country Managers and Country Officers.⁶² Work is distributed to “teams consisting of at least a Country Manager and Country Officer.”⁶³ These teams are responsible for drafting COI for a particular geographical area. For example, a two-person team is responsible for Iran, Iraq, Syria, and Yemen.⁶⁴

⁵⁵ *Home Office: About Us*, GOV.UK, <https://www.gov.uk/government/organisations/home-office/about> (last visited Mar. 22, 2023).

⁵⁶ *UK Visas and Immigration: About Us*, GOV.UK, <https://www.gov.uk/government/organisations/uk-visas-and-immigration/about> (last visited Mar. 22, 2023). The agency also processes citizenship applications.

⁵⁷ Mark Henderson, Rowena Moffatt & Alison Pickup, *Best Practice Guide to Asylum and Human Rights Appeals*, ELEC. IMMIGR. NETWORK (Jan. 15, 2021), <https://www.ein.org.uk/bpg/chapter/17>. Previously, U.K. immigration practices were guided by the Nationality, Immigration and Asylum Act 2002 (now repealed). *Id.* Today, COI practices are also guided by the United Nations High Commissioner for Refugees (UNHCR) and the 1951 Refugee Convention. *See* DAVID BOLT, AN INSPECTION OF THE HOME OFFICE’S PRODUCTION AND USE OF COUNTRY OF ORIGIN INFORMATION APRIL – AUGUST 2017 (2018) [hereinafter BOLT INSPECTION 2018], https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677556/An_inspection_of_the_production_and_use_of_Country_of_Origin_Information.pdf (referencing UNHCR guidance and the 1951 Refugee Convention).

⁵⁸ The Independent Chief Inspector is a publicly appointed official who serves a three-year term monitoring and reporting to Parliament on the efficiency of the immigration, asylum, nationality, and customs functions. *Independent Chief Inspector of Borders and Immigration: About Us*, GOV.UK, <https://www.gov.uk/government/organisations/independent-chief-inspector-of-borders-and-immigration/about> (last visited Mar. 22, 2023).

⁵⁹ *Id.*; UK Borders Act, 2007, § 48(2)(j) (U.K.), <https://www.legislation.gov.uk/ukpga/2007/30/section/48> (“The Chief Inspector shall consider and make recommendations about . . . the content of information about conditions in countries outside the United Kingdom which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.”).

⁶⁰ Henderson, Moffatt & Pickup, *supra* note 66. Previously, the Country of Origin Information Service (COIS) prepared Country Information and Guidance, while the Country Specific Litigation Team (CSLT) prepared Operational Guidance Notes. *Id.* COIS and CSLT merged into CPIT and the work products were renamed due to criticism that the names improperly implied an ability to direct executive decision-making. *Id.*

⁶¹ BOLT INSPECTION 2018, *supra* note 66, at 21.

⁶² *Id.*

⁶³ *Id.*

⁶⁴ *Id.*

The Independent Advisory Group on Country Information (IAGCI), described below, provides quality assurance of the CPIT’s work for the Independent Chief Inspector.⁶⁵ The group is made up of academics and people from organizations with a working interest in country conditions information.⁶⁶ Membership in the IAGCI, which is voluntary and unpaid, is by invitation of the Independent Chief Inspector.⁶⁷

i. CPIT Work Products

The Country Policy Information Team aims “to produce between 100 and 120 updated or new Country Policy and Information Notes (CPIN) a year and responds to around 1,000 requests from staff for specific information (COIR).” CPINs are made publicly available but responses to COIRs are kept within the U.K. Home Office. The CPIT also produces and makes publicly available Country Background Notes (CBN).⁶⁸

CPINs are more narrowly focused (e.g., fear of persecution or serious harm in Pakistan by the state or non-state actors because the person is a Shia Muslim), whereas CBNs cover a country’s general demography, geography, and issues relevant to protection claims (e.g., general country information and human rights issues in Afghanistan).⁶⁹ CPINs also include an assessment of risk, availability of protection, and/or reasonableness of internal relocation; CBNs do not. Both CPINs and CBNs are used by the U.K. Home Office decisionmakers in protection and human rights claims, but neither is intended to replace specific, factual, consideration of individual claims.⁷⁰ As

⁶⁵ *The Independent Advisory Group on Country Information (IAGCI)*, GOV.UK, <https://www.gov.uk/government/collections/the-independent-advisory-group-on-country-information-iagci> (last visited Mar. 31, 2021). The UK Borders Act of 2007 created and assigned oversight responsibilities to the Independent Chief Inspector; the Independent Chief Inspector then instituted IAGCI in 2009. Henderson, Moffatt & Pickup, *supra* note 66.

⁶⁶ *Dr. Chelvan Appointed Independent Reviewer for the IAGCI*, NO5 BARRISTERS’ CHAMBERS (Oct. 22, 2019), <https://www.no5.com/media/news/dr-chelvan-appointed-independent-reviewer-for-the-iagci> (announcing commission of a globally recognized expert in protection and human rights claims based on sexual or gender identity and expression for the thematic CPIN review).

⁶⁷ DAVID BOLT, INDEP. CHIEF INSPECTOR BORDERS & IMMIGR.: ANNUAL REPORT FOR THE PERIOD 1 APRIL 2019 TO 31 MARCH 2020 29 (2020), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/916542/ICIBI_An_nual_Report_for_the_period_1_April_2019_to_31_March_2020.pdf [hereinafter BOLT REPORT 2020].

⁶⁸ *Country Policy and Information Notes*, GOV.UK, <https://www.gov.uk/government/collections/country-policy-and-information-notes> (last updated Nov. 29, 2022). Decision-makers submit COIRs to CPIT when they cannot find the specific country information they need in an existing CPIN. CPIT provides a response to the decision-maker directly and if CPIT believes the contents could be useful to others it publishes the response on internal Home Office intranet. BOLT INSPECTION 2018, *supra* note 66, at 28.

⁶⁹ *Compare HOME OFFICE, COUNTRY POLICY AND INFORMATION NOTE: PAKISTAN: SHIA MUSLIMS* (2021), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1001418/Pakistan-Shia_Muslims-CPIN-v3.0_July_2021_.pdf with HOME OFFICE, COUNTRY BACKGROUND NOTE: AFGHANISTAN (2020) [hereinafter COUNTRY BACKGROUND NOTE: AFGHANISTAN], <https://www.ecoi.net/en/file/local/2042243/Afghanistan-Background+Note-v1.0%28Archived%29.pdf>.

⁷⁰ *But see* BOLT INSPECTION 2018, *supra* note 66 (noting the risk that adjudicators will simply adopt the CPIN’s analysis of risk on return, internal relocations, the availability of state protection, and other considerations, instead of considering the specific facts of an individual case).

of November 2022, when the CPIN webpage was last updated, the CPIT had published CPINs for forty-five countries.⁷¹

ii. CPIT Methodology – Planning the Research

The Country Policy Information Team receives requests for research primarily from decision-makers in the Asylum Intake and Casework Unit.⁷² The CPIT also determines research areas based on factors like geopolitical changes, migration trends, policy changes, and new case law.⁷³ CPIT managers cite ten factors that affect the drafting and updating of CPINs:⁷⁴

1. Real world events – Individual officers within the CPIT are responsible for staying up to date with current events for assigned countries. There is no set method, but generally, officers follow news, blogs and social media, drawing the CPIT’s attention to important developments as they arise.

2. Asylum intake – The U.K. Home Office records actions and decisions for asylum cases in the Case Information Database. The CPIT is working on methods of using the Database to observe and forecast trends so it can plan research initiatives accordingly.⁷⁵

3. Significant new external reporting on a country or topic – New reporting can trigger new or updated CPINs, though there is no defined threshold for significance.

4. The age of existing CPINs and the need to maintain relevance – The CPIT aims to update CPINs at least every two years, though an estimated 20% are more than two years old.

5. Current, planned, or potential Country Guidance cases – Per the Independent Chief Inspector, “Country Guidance determinations are judicial findings on the risk on return to a specific country. They become binding for future asylum appeals relating to that country, unless the country guidance is superseded or is shown not to be applicable to a specific asylum claim.”⁷⁶ The CPIT provides research for Country Guidance cases and coordinates CPINs with Country Guidance determinations to ensure consistency.⁷⁷

⁷¹ *Country Policy and Information Notes*, *supra* note 78.

⁷² BOLT INSPECTION 2018, *supra* note 66, at 24. AIC is responsible for receiving and registering claims, conducting screening interviews, and making initial asylum decisions. *Id.*

⁷³ *Id.*

⁷⁴ *Id.* at 26–29.

⁷⁵ This has not yet been tested, likely due to inconsistent data recording in the Database. *Id.* at 26.

⁷⁶ *Id.* at 27.

⁷⁷ For example, a recent CPIN included the Country Guidance case of *TG and Others* (Afghan Sikhs persecuted) (CG) [2015] UKUT 595 (IAC), which held “[m]embers of the Sikh and Hindu communities in Afghanistan do not face a real risk of persecution or ill-treatment such as to entitle them to a grant of international protection on the basis of their ethnic or religious identity, *per se*.” HOME OFFICE, COUNTRY POLICY AND INFORMATION NOTE: AFGHANISTAN: HINDUS AND SIKHS, at 9–10 (2021) <https://www.ecoi.net/en/file/local/2048207/Afghanistan-CPIN-Hindus+and+Sikhs+v6.0%28Archived%29.pdf> (last visited Mar. 22, 2023).

6. Other issues arising from litigation – The CPIT claims to review appeals rates because successful appeals might indicate that appellate decision-makers deviate from the country conditions set forth in CPIT’s publications.⁷⁸

7. Common issues raised by COIRs – Many Country-of-Origin Information Requests on the same topic may prompt CPIT to create a new CPIN, though this rarely happens; decision-makers only submit COIRs in 3% of asylum claims.⁷⁹

8. Fact finding missions – CPIT staff or counterpart international COI units visit “key asylum intake countries” to “assess and resolve information gaps . . . for asylum decision makers.” On these periodic fact-finding missions, CPIT staff “talk to a balanced range of sources from both government and civil society.” The results of these missions inform decisions on which CPINs need to be updated.⁸⁰

9. IAGCI recommendations – As part of the quality review process (discussed in further detail in a later section), IAGCI proffers recommendations for additions, deletions, or amendments to CPIT products. The CPIT chooses whether to accept or reject the recommendations.⁸¹

10. Direct requests from UKVI – Direct requests from U.K. Visas and Immigration, whether through the Chief Caseworker of the Asylum Intake and Casework Unit (AIC), the manager of one of AIC’s twelve decision-making hubs, or the CPIT Quarterly Steering Board,⁸² are particularly influential in the CPIT’s research plans.

iii. CPIT Methodology – Conducting the Research

When preparing reports, the Country Policy Information Team follows the general research principles set out in “Common EU Guidelines for Processing Country of Origin Information”⁸³

⁷⁸ There is no observable link between appeals rates and updated CPINs. The Immigration Law Practitioners’ Association claims CPIT is “unwilling to respond to appeal determinations with the exception of binding Country Guidance cases that undermined its policy or country information.” BOLT INSPECTION 2018, *supra* note 66, at 27.

⁷⁹ CPIT asserts the low request rate indicates that existing CPINs largely meet decision-makers’ needs, though no analysis has tested this assertion nor explored alternative reasons. *Id.* at 28.

⁸⁰ BOLT INSPECTION 2018, *supra* note 66, at 59–60.

⁸¹ In practice, “[i]t is unclear how often an IAGCI review has caused CPIT to *revise* its work plan for updating or producing new CPINs.” *Id.* (emphasis added). Usually, CPIT accepts IAGCI recommendations to change a CPIN “when that CPIN is next due for updating.” *Id.*

⁸² The Steering Board generally consists of CPIT management, Home Office Legal Advisors, the AIC Chief Caseworker, Non-Suspensive Appeals Hub representatives, presenting staff (Home Office representatives at appeal hearings), Asylum Policy representatives, and Specialist Appeals Team representatives. BOLT INSPECTION 2018, *supra* note 66, at 29.

⁸³ EUR. UNION, COMMON EU GUIDELINES FOR PROCESSING COUNTRY OF ORIGIN INFORMATION (COI) 2 (Apr. 2008), <https://www.refworld.org/docid/48493f7f2.html> (“Pursuant to the Action Plan of the European Commission, the COI Guidelines aim at ‘improving the quality of decision making in the common European asylum system’ while contributing to the harmonization of the asylum processes within the EU.”). According to the preface of every recent CPIN, this is still true post-Brexit. See for e.g., HOME OFFICE, COUNTRY POLICY AND INFORMATION NOTE: AFGHANISTAN: FEAR OF THE TALIBAN (2022), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069647/AFG_CP_IN_Fear_of_the_Taliban.pdf.

and the Austrian Centre for Country of Origin and Asylum Research and Documentation’s training manual on “Researching Country of Origin Information.”⁸⁴ Both guidelines emphasize that sources of country conditions information must be evaluated for relevance, reliability, accuracy, balance, currency, transparency, and traceability.⁸⁵ The introduction to each CPIN notes:

All information is publicly accessible or can be made publicly available and is from generally reliable sources. Sources and the information they provide are carefully considered before inclusion.

Factors relevant to the assessment of the reliability of sources and information include:

- the motivation, purpose, knowledge and experience of the source
- how the information was obtained, including specific methodologies used
- the currency and detail of information, [and]
- whether the COI is consistent with and/or corroborated by other sources.

Multiple sourcing is used to ensure that the information is accurate and balanced and corroborated, which is compared and contrasted where appropriate so that a comprehensive and up-to-date picture is provided of the issues relevant to this note at the time of publication.⁸⁶

Before publication, a new CPIN undergoes numerous reviews within the CPIT, and is also circulated for editing and feedback among U.K. Home Office stakeholders and legal advisors, as well as a U.K. research consultancy.⁸⁷

iv. IAGCI Oversight – Reviewing the Quality of CPIT’s Research

The Independent Advisory Group on Country Information (IAGCI), comprised of “appropriately qualified independent reviewers,” quality assures a portion of the CPIT’s work products after publication.⁸⁸ With guidance from the Independent Chief Inspector, the Group meets up to three times annually to “consider both the overall number of asylum claims and the number of rejected claims when deciding which countries, topics or themes should be reviewed next.”⁸⁹

⁸⁴ AUSTRIAN CENTRE FOR COUNTRY OF ORIGIN & ASYLUM RESEARCH & DOCUMENTATION (ACCORD), RESEARCHING COUNTRY OF ORIGIN INFORMATION: TRAINING MANUAL (2013), <https://www.coi-training.net/site/assets/files/1021/researching-country-of-origin-information-2013-edition-accord-coi-training-manual.pdf> (“[D]eveloped by ACCORD with UNHCR support, [the manual] provides a comprehensive discussion of all aspects of researching and using country information in the context of applications for international protection.”).

⁸⁵ See e.g., COUNTRY BACKGROUND NOTE: AFGHANISTAN, *supra* note 79, at 2.

⁸⁶ COUNTRY BACKGROUND NOTE: AFGHANISTAN, *supra* note 79.

⁸⁷ BOLT INSPECTION 2018, *supra* note 66, at 38 (noting review by a consultancy “goes some way towards satisfying” recommendations for peer or expert review before publication).

⁸⁸ *Id.* (explaining IAGCI does not review every single publication, but reviews publications for 3–4 countries at 2–3 meetings a year, and aims to review the top 20 asylum intake countries over the course of 2 years).

⁸⁹ *Id.*

For example, IAGCI recently reviewed CPINs and COIRs for El Salvador because of an uptick in asylum cases from that country.⁹⁰

For any given review, independent reviewers send the IAGCI their recommended additions, deletions, clarifications to a CPIT publication.⁹¹ IAGCI quality assures the reviews and then submits them to the CPIT. Then, IAGCI meets with the CPIT and independent reviewers to consider any disagreements.⁹² If the parties disagree on something, IAGCI commissions further inputs from the independent reviewers before signing off the reviews as complete.⁹³ The Independent Chief Inspector produces a “covering report” with his recommendations and sends this, along with the IAGCI reviews and the CPIT responses, to the Home Secretary to be relayed to Parliament.⁹⁴ The CPIT ultimately decides whether to adopt suggested changes.⁹⁵ All reports, reviews, and responses are publicly available.⁹⁶

III. PROPOSALS TO IMPROVE COUNTRY OF ORIGIN INFORMATION IN THE U.S. ASYLUM SYSTEM

Given the importance of accurate and up to date country of origin information in determining asylum claims, US policymakers should increase funding to bolster country conditions research for asylum adjudicators. As described below, funding should primarily be allocated towards expanding RAIO’s regional research teams, on which adjudicators primarily rely for country-of-origin information. USCIS should also relaunch a webpage for RAIO Research, potentially with the long-term goal of publishing country conditions information. Lastly, USCIS should consider forming an Independent Quality Assurance Board for Country of Origins Information, comprised of country conditions experts, to ensure that RAIO Research has sufficient resources to support adjudicators through country-of-origin research and training.

A. Expand RAIO Research Capacity

First, RAIO should allocate researchers to different regions through an evidence-based approach that can identify how to expend its resources most effectively. Regular needs-based

⁹⁰ IAGCI, INSPECTION OF COUNTRY OF ORIGIN INFORMATION (2020) [hereinafter IAGCI, INSPECTION OF COUNTRY OF ORIGIN INFORMATION], https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/963208/Inspection_Report_on_Country_of_Origin_Information_El_Salvador_and_Sudan_December_2020.pdf.

⁹¹ BOLT REPORT 2020, *supra* note 75, at 29.

⁹² *Id.*; IAGCI, INSPECTION OF COUNTRY OF ORIGIN INFORMATION, *supra* note 101, at 3. (“The completed reviews were quality assured by the IAGCI Chair and members and sent to CPIT. CPIT added its responses, forming a single document for each country review. [IAGCI] met via Skype . . . to consider the reviews and the CPIT responses.”).

⁹³ BOLT REPORT 2020, *supra* note 76, at 29.

⁹⁴ *Id.*

⁹⁵ BOLT INSPECTION 2018, *supra* note 66, at 9 (“Ultimately, CPIT decides for itself what recommendations for additions, deletions or amendments to a CPIN it accepts, and in the case of IAGCI recommendations when it will make any changes. This has resulted in some difficult exchanges with IAGCI, particularly where CPIT has rejected certain sources of information because it has not felt able to corroborate them, for example foreign language sources and internet-based social media.”).

⁹⁶ *The Independent Advisory Group on Country Information (IAGCI)*, GOV.UK (Aug. 9, 2017), <https://www.gov.uk/government/collections/the-independent-advisory-group-on-country-information-iagci>.

assessments should be utilized, balancing the frequency of claims, the most common types of claims, and the complexity of the claims from particular countries of origin. Drawing from these assessments, and with an eye to likely migration trends, RAIO research should confirm that current allocations of researchers match the need for country-of-origin information for particular geographic sub-regions, hiring additional researchers as needed. RAIO should also survey adjudicators to enable them to identify any COI gaps, including requests for specific COI.

Currently, RAIO Research divides the geographic regions into the following six regions: Latin America and the Caribbean; Europe and Central Asia; East and South Asia; Horn of Africa; Middle East and North Africa; and Sub-Saharan Africa. According to data from the Department of Homeland Security's Office of Immigration Statistics, since 2015,⁹⁷ seventy to eighty percent of asylum applicants have come from Latin America and Asia. Despite these disproportionate numbers, only three researchers are assigned to Latin America and only two researchers are assigned to Asia. These regions should be further divided into sub-regions, as proposed below, to ensure more nuanced research:

- Latin America:
 - Central America and Mexico: current priority countries are El Salvador, Guatemala, Honduras, Nicaragua
 - South America: current priority countries are Brazil, Colombia, Ecuador, Peru, Venezuela
 - The Caribbean: current priority countries are Cuba, Dominican Republic, and Haiti
- Asia: East Asia and South Asia;
- Europe and Central Asia
- Middle East and North Africa; and
- Sub-Saharan Africa: Horn of Africa and Sub-Saharan Africa

More researchers should be assigned to the sub-regions that have consistently produced the highest number of asylum claimants and/or the most complex claims. The new Management and Program Analyst is currently gathering data on the past two years of asylum receipts which will help to identify the need for country of origin information for different regions.

In order to meet the demand it faces more effectively, RAIO Research should hire nine to eleven additional researchers, three more research managers to oversee their work, and one more Management and Program Analyst to disseminate their work. As the program expands, it will be important to create a supervisory structure that ensures that these additional resources are put to the most effective use possible. Like the U.K. Home Office, RAIO Research should appoint

⁹⁷ 2015 was the last year for which DHS OIS released data on the number of asylum filings; prior to 2015, the data only concerns asylum claims that were granted. *Immigration Data and Statistics: Refugees and Asylees*, DHS, <https://www.dhs.gov/immigration-statistics/refugees-asylees> (last updated Mar. 14, 2023). OIS publishes Annual Flow Reports, which report on the flow of refugees and asylees who applied for and were granted asylum during a given fiscal year. *Id.*

research managers to oversee research by sub-region, train and supervise researchers, and act as the point-person for the Chief of the Research Unit. Managers should be hired at the GS-14 level, and country researchers and management and program analysts should be hired at the GS-13 to GS-14 level. In addition to the costs of these salaries, RAIO Research should receive an enhancement to cover the additional cost of the training and development work they perform.

Increasing and assigning staff using an evidence-based approach that takes into account past demand and predicts future needs would enable RAIO Research to produce more reliable and accurate country conditions information in a shorter amount of time, increasing the efficiency of the asylum adjudication process. Adding staff with expertise in knowledge management would help to achieve that goal by enabling researchers to focus on COI research and ensuring their work product is disseminated effectively. Expanding the teams would allow researchers to conduct more thorough and accurate research, respond to adjudicators more quickly, and update existing country conditions reports more frequently. This approach could be piloted with the Latin American region to better understand potential efficiencies.

Moreover, greater capacity at RAIO Research could make adjudication more efficient by expanding “pattern and practice of persecution” analysis, following the recommendations of the USCIS Ombudsman. RAIO Research could identify groups of people in specific countries who are likely to have a well-founded fear of persecution based on one of the five grounds for asylum, and offer country conditions information that would enable adjudicators to assess their cases quickly. In addition, RAIO Research could create interview guidance tailored to certain groups fearing persecution to increase efficiency and accuracy in adjudication. Finally, an expanded RAIO Research team could train asylum officers on how to incorporate country conditions information into their decisions.

B. Distribute COI More Efficiently and Effectively

The country of origins information produced by RAIO Research should be more accessible to adjudicators and potentially other participants in the process. Until its web redesign in October 2006, USCIS had dedicated a webpage for the Resource Information Center (now RAIO Research), where it publicly published country conditions information including country information pages, query responses, profiles, alerts, perspectives, question and answers, information packets, and master exhibits.⁹⁸ The page has since been removed and COI is accessible to adjudicators only via their internal, currently outdated, SharePoint server. This gap in knowledge management makes the asylum process less efficient than it should be; adjudicators who can easily access reliable country of origin information will have increased capacity to make more accurate and more efficient decisions.

⁹⁸ *Resource Information Center*, USCIS, <https://web.archive.org/web/20031229145600/https://www.uscis.gov/graphics/services/asylum/ric/index.htm> (last visited Mar. 1, 2023).

In the long run, RAIO Research should consider publishing their work product so that this COI is more easily available on well-known search engines and adjudicators can rely on it in their decisions. This publication of RAIO Research work product would not raise confidentiality concerns because the information is not classified; researchers consult publicly available information to create these pages. Query responses, which may contain sensitive or identifying information, are redacted of identifying information before being shared even internally; this process should be continued.

C. Create an Independent Board for Country of Origins Information

Lastly, RAIO should consider creating an Independent Board for Country of Origins Information to ensure that RAIO Research is receiving sufficient support to enable it to meet and exceed statutory and regulatory requirements. This group should be comprised of twelve COI experts—including a librarian from the Library of Congress.⁹⁹ The Quality Assurance Board would make recommendations around staffing, support, and training of RAIO Research, which the RAIO Research would then decide whether to accept or reject. Membership in the Quality Assurance Board would be voluntary, unpaid, and by invitation of the U.S. Government Accountability Office to ensure neutrality.¹⁰⁰ The Board would meet quarterly and additional meetings can be scheduled at the Chief’s request. The Quality Assurance Board would be an effective, cost-free way to assure that the Research Unit is sufficiently resourced to provide accurate, detailed, and timely COI to adjudicators.

⁹⁹ The Library of Congress has an online research guide which includes a section on country research. *Library of Congress, Immigration & Asylum Law: A Beginner's Guide: Other Online Resources: Country Research*, LIBRARY OF CONG., <https://guides.loc.gov/immigration-asylum-law/online-resources#s-lib-ctab-21254926-2> (last visited Mar. 22, 2023).

¹⁰⁰ The U.S. Government Accountability Office is “an independent, non-partisan agency that works for Congress.” *About*, U.S. Government Accountability Office, <https://www.gao.gov/about> (last visited Apr. 11, 2023).