



Practice Advisory: Establishing Employment Authorization for T and U Nonimmigrants Without an EAD Card

On February 17, 2022, USCIS added a new section to the [Handbook for Employers](#) (“the Handbook”), describing the evidence that employers should accept from T and U nonimmigrants as proof of their authorization for employment.¹ Reference to the Handbook may be helpful to persons in U and T status who have not yet received an employment authorization document (EAD), but are nevertheless eligible to work based on the terms of their visa status, and who seek to establish their eligibility for employment by presenting evidence of their visa status.

The Immigrant Reform and Control Act (IRCA) established the employment verification system that requires employers to verify the identity of their employees and their authorization to work in the United States, and requires employers to complete and retain an Employment Eligibility Verification Form I-9 for each employee.² IRCA includes an anti-discrimination provision under which an employer’s “request ... for more or different documents than are required under such section or refusing to honor documents tendered that on their face reasonably appear to be genuine shall be treated as an unfair immigration-related employment practice if made for the purpose or with the intent of discriminating against an individual.”³ Accordingly, the Form I-9 instructions state that “[e]mployers CANNOT specify which document(s) an employee may present to establish employment authorization,” and that

¹ See generally UNITED STATES CITIZENSHIP AND IMMIGRATION SERVS., HANDBOOK FOR EMPLOYERS M-274, EVIDENCE OF STATUS FOR CERTAIN CATEGORIES, 6.8: T AND U NONIMMIGRANT STATUS (last reviewed/updated Feb. 17, 2022) (hereinafter “HANDBOOK FOR EMPLOYERS 6.8”), <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274/60-evidence-of-status-for-certain-categories/68-t-and-u-nonimmigrant-status>.

² 8 USC §1324a.

³ 8 USC §1324b(a)(6).

“[t]he employer must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”⁴

This Practice Advisory will summarize the differing work authorization rules for T and U principals and derivatives, the Handbook’s instructions to employers regarding T and U nonimmigrants, and the privacy concerns arising from the use of visa status documentation to establish work authorization. Practitioners can use this information to advocate for their clients who are authorized to work incident to their status, but are not in possession of a valid EAD.

I. **Certain T and U Nonimmigrants Are Eligible By Regulation to Work Without an Employment Authorization Document.**

Before reviewing the guidance produced in the Handbook and the documents adequate to establish work authorization for T and U nonimmigrants, it is important to understand the complicated regulatory framework for employment authorization of principal and derivative T and U nonimmigrants. Specifically, 8 C.F.R. § 274a.12(a) provides that noncitizens with **T-1, U-1, and U-2, U-3, U-4, and U-5** visas are employment authorized incident to status.⁵ Noncitizens with **T derivative** status are **not** employment authorized incident to status.⁶ The Handbook states that noncitizens with T-1, U-1, and U derivative status with pending, timely filed U or T based Applications for Adjustment of Status (“AOS”) are work authorized incident to their status⁷ for an additional 1 or 2 years, respectively. The Handbook states that **T derivatives** with pending AOS applications are **not** authorized to work without a code (c)(9) EAD.⁸

Although noncitizens with T-1, U-1, and U derivative status are eligible to work without a valid EAD card, List C of the Form I-9 currently does not

⁴ FORM I-9 INSTRUCTIONS, DEPT. OF HOMELAND SECURITY, at 1 (Oct. 21, 2019) (hereinafter “FORM I-9 INSTRUCTIONS”)

⁵ 8 C.F.R. §274a.12(a) (categories of noncitizens who are employment authorized incident to status), (a)(16) (noncitizens with T-1 status), (a)(19) (noncitizens with U-1 status), and (a)(20) (noncitizens with U derivative status).

⁶ 8 C.F.R. § 274a.12(c) (“An [noncitizen] within a class of [noncitizens] described in this section must apply for work authorization”), § (c)(25) (T derivatives).

⁷ Cf. HANDBOOK FOR EMPLOYERS 6.8, at 1.

⁸ *Id.* at 2.

explicitly identify evidence of these statuses as examples of proof of employment authorization. The section of the Handbook related to U and T visa status clarifies for employers that noncitizens with T-1, U-1, and U derivative status are work authorized incident to status.

II. The USCIS Handbook for Employers: 6.8: T and U Nonimmigrant Status Describes the Documentation Sufficient to Establish Work Authorization for Eligible Nonimmigrants with T and U Status

In the new Section 6.8 of the Handbook, USCIS provides helpful clarity to employers about the employment eligibility of noncitizens in T and U status. The Handbook states that “not all classes of T and U nonimmigrants must have an EAD card before they start working.”⁹ For Form I-9 purposes, the Handbook advises that employees in T or U nonimmigrant status should check “An [noncitizen]¹⁰ authorized to work,” and then enter their EAD “card expires” date **or** the “admit until date” on their I-94 as the expiration date.¹¹

Further, the Handbook provides guidance to employers as to how the Form I-9 should be completed by employees in T or U status who wish to rely on their visa status as proof of employment authorization. To complete the Form I-9, employees may show a “List A” document (evidence of employment authorization **and** identity) **or both** a “List B” document (evidence of identity) **and** a “List C” document (evidence of employment authorization.)¹² The Handbook states that a Form I-94 listing T-1, U-1, U-2, U-3, U-4, or U-5 as the “class of admission” is an acceptable “List C” document.¹³ The Handbook notes that these noncitizens do not need an EAD card as **evidence** of employment authorization if they produce their Form I-94 and an acceptable “List B” document, because they “are employment authorized incident to status.”¹⁴ The specific documentation requirements for nonimmigrants in T and U status are covered below.

⁹ HANDBOOK FOR EMPLOYERS 6.8 at 1.

¹⁰ While the term “alien” is used in regulations, immigration forms (including Form I-9), and form instructions, ASISTA will use the term “noncitizen” instead of “alien” throughout this Practice Advisory.

¹¹ HANDBOOK FOR EMPLOYERS 6.8 at 1

¹² Cf. 8 C.F.R. §274a.2(b)(1)(v)(A)-(C) (“The individual may present **either** an original document which establishes both employment authorization and identity, **or** an original document which establishes employment authorization **and** a separate original document which establishes identity.”) (emphasis added), FORM I-9 INSTRUCTIONS, at 1 (“The employer must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”)

¹³ HANDBOOK FOR EMPLOYERS 6.8, at 1.

¹⁴ See HANDBOOK FOR EMPLOYERS 6.8, at 1.

A. T-1 and U-1 Status

Regarding noncitizens with valid T-1 or U-1 status, the Handbook¹⁵ correctly reflects the regulation, which holds that noncitizens with Form I-94s that show valid T-1 and U-1 status **do not need an EAD** to work lawfully in the United States.¹⁶ Thus, practitioners can advise clients with a Form I-94 reflecting admission in current T-1 or U-1 status that they may work lawfully in the United States without an EAD card. This is helpful for U-1 and T-1 clients whose status has been approved but who have not received EAD cards yet.

B. U Derivatives

The derivative family members of U-1 principals who receive U-2, U-3, U-4, and U-5 visas (“U derivatives”), are by regulation authorized to work based on their status alone.¹⁷ U-1 and T-1 principals do not need an EAD, but the same regulation states that noncitizens in U derivative status must apply for an EAD card in order to work in the United States.¹⁸ Although U derivatives are thus required to **apply** for an EAD, they are not required to present it to establish their eligibility for work, and the Handbook does not instruct employers to ask them for proof of an EAD filing.

C. T Derivatives

Unlike U derivatives, T derivatives are **not** employment authorized incident to status.¹⁹ The Handbook states that a Form I-94 showing valid admission in a T derivative status is “not acceptable as a List C document.”²⁰ Thus, T

¹⁵ See HANDBOOK FOR EMPLOYERS 6.8, at 1 (“Employees whose Form I-94 indicates a class of admission of T-1, U-1...may instead choose to present their Form I-94 as a List C #7 document and must also present a List B identity document.”)

¹⁶ See 8 C.F.R. §§274a.12(a), (a)(16) (T-1 nonimmigrants), and (a)(19) (U-1 nonimmigrants) ((a)(16) and (a)(19) categories are employment authorized incident to status and are not within the classes of noncitizens who are required to apply for an EAD card.)

¹⁷ 8 C.F.R. § 274a.12(a) states that noncitizens in U derivative status “are authorized to be employed in the United States...as a condition of their admission or subsequent change to one of the indicated classes. See 8 C.F.R. §274a.12(a)(20) (noncitizens with U derivative status).

¹⁸ See 8 C.F.R. §274a.12(a) (“Any [noncitizen] who is within a class of [noncitizens] described in...(a)(20) of this section, and who seeks to be employed in the United States, must apply to U.S. Citizenship and Immigration Services (USCIS) for a document evidencing such employment authorization.”) Category (a)(20) is for U derivatives. See 8 C.F.R. §274a.12(a)(20).

¹⁹ 8 C.F.R. §274a.12(c) (“An [noncitizen] within a class of [noncitizens] described in this section must apply for work authorization.”), §(c)(25) (T derivatives).

²⁰ HANDBOOK FOR EMPLOYERS 6.8, at 1

derivatives must possess an EAD card and present it to their employer in order to work lawfully in the United States.

Valid U-1, U derivative, T-1, and T derivative status: What documents are necessary to demonstrate employment authorization?

Status	Document needed	EAD card needed?
Valid U-1 status	Form I-94 showing valid U-1 status. ²¹	No. ²²
Valid U derivative status	Form I-94 showing valid U derivative status. ²³	No. ²⁴
Valid T-1 status	Form I-94 showing valid T-1 status. ²⁵	No. ²⁶
Valid T derivative status	Valid EAD card. ²⁷	Yes. ²⁸

PRACTICE TIP:

If the client has presented an acceptable “List B” identity document and an I-94 showing valid T-1 or U-1 status and the employer still demands an EAD card, practitioners are encouraged, with the client’s permission, to communicate with the employer on the client’s behalf. The practitioner may write a letter or make a similar communication to the employer that explains that the client is employment authorized incident to status and does not need to produce an EAD card to satisfy the requirements of the Form I-9. The letter should include a citation to 8 C.F.R. §§274a.12(a) and (a)(16) or (a)(19)

²¹ See HANDBOOK FOR EMPLOYERS 6.8, at 1.

²² See 8 C.F.R. §274a.12(a), (a)(19), HANDBOOK FOR EMPLOYERS 6.8, at 1.

²³ See 8 C.F.R. §274a.12(a), (a)(20), cf. 8 C.F.R. §274a.2(b)(v)(C) (An “Employment authorization document issued by the Department of Homeland Security” is an acceptable “List C” document.), *I-9 Acceptable Documents*, UNITED STATES CITIZENSHIP AND IMMIGRATION SERVS. (last reviewed/updated Jan. 14, 2021), <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents> (a Form I-94 “issued to...work authorized nonimmigrants...because of their immigration status” is an “Employment authorization document issued by the Department of Homeland Security.”) U derivatives are “work authorized nonimmigrants” because they are work authorized incident to status. Cf. 8 C.F.R. §§274a.12(a), (a)(20).

²⁴ The regulation instructs U derivatives to apply for an EAD, see 8 C.F.R. §274a.12(a), (a)(20), but the Handbook does not require employees to present proof of the EAD application to employers.

²⁵ See HANDBOOK FOR EMPLOYERS 6.8, at 1.

²⁶ See 8 C.F.R. §274a.12(a), (a)(16), HANDBOOK FOR EMPLOYERS 6.8, at 1.

²⁷ See 8 C.F.R. §§274a.12(c) (c)(25), HANDBOOK FOR EMPLOYERS 6.8, at 1.

²⁸ See 8 C.F.R. §§274a.12(c) (c)(25), HANDBOOK FOR EMPLOYERS 6.8, at 1.

(whichever is appropriate), which states that U-1s and T-1s are employment authorized incident to status, and does not contain a requirement that these noncitizens apply for an EAD card.

The letter should also cite to the new section of the Handbook, which explains that an I-94 showing valid admission in U-1 or T-1 status is an acceptable “List C” document. Finally, the letter should cite the Form I-9 instructions, which state that the employer **cannot** require specific documents from the client (such as an EAD card) as long as the client submits an acceptable “List B” document and their I-94 showing admission in U-1 or T-1 status as a “List C” document.²⁹ The practitioner is encouraged to include printouts of 8 C.F.R. §274a.12(a), the Form I-9 instructions, and Section 6.8 of the Handbook.

Example:

Tina has approved U-1 Nonimmigrant Status. Her I-94 shows that she is admitted in U-1 status from January 1, 2022 through December 31, 2025. Tina has not received her U-1 EAD card yet. Assume that Tina has a valid “List B” identity document. Tina may work lawfully in the United States without an EAD card during the validity period of her U-1 status.³⁰ She should present the following to her employer: her “List B” identity document and her I-94 showing her valid admission in U-1 status.

If Tina’s employer refuses to accept these documents and instead demands an EAD card, Tina’s counsel can write a letter to the employer that makes the arguments detailed on pages 5-6 of this Practice Advisory.³¹

NOTE: Privacy implications

While it is helpful that some clients can show a Form I-94 as evidence of employment authorization, practitioners should ensure that clients

²⁹ FORM I-9 INSTRUCTIONS, at 1 (“Employers CANNOT specify which document(s) an employee may present to establish employment authorization. The employer must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”) (emphasis in original.)

³⁰ Cf. 8 C.F.R. §§274a.12(a), (a)(19) (U-1s are employment authorized incident to status and are not required to possess an EAD card), FORM I-9 INSTRUCTIONS, at 1, HANDBOOK FOR EMPLOYERS 6.8, at 1 (an I-94 showing admission in U-1 status is a valid “List C” document.)

³¹ FORM I-9 INSTRUCTIONS, at 1.

understand the privacy implications. If a client shows an employer a Form I-94 demonstrating valid T or U status, the employer will know that the client has the listed status. An employer who is familiar with the survivor-based nature of U and T nonimmigrant status will know that the client or a family member are survivors of human trafficking or another serious crime. If a client is concerned about an employer having this personal information about them, the client may wish to wait until they have a valid EAD card before they begin working. While the employer can look up the “code” on the client’s EAD card and discover the client’s status, a client’s status is less obvious to an employer who is looking at an EAD card versus an I-94.

D. Extension of Status Based on Law Enforcement or Exceptional Circumstances

The Handbook states that a Form I-797C that a T or U Nonimmigrant receives after filing a Form I-539 for extension of status based on law enforcement need or exceptional circumstances “is not an acceptable document for Form I-9 purposes.”³² The Handbook states that these noncitizens may file a Form I-765 concurrently with their Form I-539.³³

E. Extension of Status Based on Pending Form I-485

T-1 and U Nonimmigrants who timely file for Adjustment of Status (“AOS”) based on their T-1 or U status receive a Form I-797C Notice of Action from USCIS, which contains an extension of their T-1 or U status.³⁴ The Handbook states that this Form I-797C, “presented in combination with” a Form I-94 demonstrating admission in T-1, U-1, or U derivative status, “is an acceptable List C #7 document to show employment authorization” for U-1s, U derivatives, and T-1s.³⁵

For **T-1 nonimmigrants (“T-1s”)**, the Handbook states that Form I-797C is an acceptable List C document for **two years** from the “admit until date” on the T-1’s I-94, **or** until the AOS “application is denied or withdrawn, whichever is earlier.”³⁶

³² HANDBOOK FOR EMPLOYERS 6.8, at 2.

³³ *See id.*

³⁴ *Cf.* HANDBOOK FOR EMPLOYERS 6.8, at 1.

³⁵ *Id.*

³⁶ *Cf. id.*

For **U-1s and U derivatives**, the Handbook states that Form I-797C is an acceptable List C document for **one year** from the “admit until date” on the U-1 or U derivative’s I-94, or until the AOS “application is denied or withdrawn, whichever is earlier.”³⁷

Accordingly, employers should consider these T-1 and U noncitizens to be employment authorized during their I-94 extension period and to not need an EAD card to work lawfully in the United States during that time.³⁸ To benefit from the employment authorization auto-extension, the “[r]eceived date” on the T-1 or U AOS Form I-797C must be “on or before” the “admit until date” on the client’s Form I-94.³⁹ In other words, the I-485 application must be filed on or before the expiration of the I-94. Thus, **it is very important for practitioners to ensure that a client’s T-1 or U-based AOS application is received on time**, both to preserve the client’s eligibility for AOS and to ensure that the client benefits from the employment authorization auto-extension. Otherwise, the client must wait until their I-539 is approved.

For I-9 purposes, the Handbook states that T-1s, U-1s, and U derivatives with timely filed, pending AOS applications should check “An [noncitizen] authorized to work until,” and enter the extended Form I-94 “Admit Until Date” as the expiration date.⁴⁰

Unlike U derivatives, **T derivatives are not** eligible for an employment authorization extension even with a timely filed AOS and Form I-797C.⁴¹ The Handbook states that these noncitizens will need to apply for an EAD card.⁴² The EAD card application will be a Category (C)(9) application, which is for applicants for Adjustment of Status.⁴³

³⁷ Cf. HANDBOOK FOR EMPLOYERS 6.8, at 1-2.

³⁸ Cf. 8 C.F.R. §274a.2(b)(1)(v) (“The individual may present **either** an original document which establishes both employment authorization and identity, **or** an original document which establishes employment authorization **and** a separate original document which establishes identity.”) (emphasis added), FORM I-9 INSTRUCTIONS (Employers “must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”), HANDBOOK FOR EMPLOYERS 6.8, at 1-2 (Form I-797C in combination with an appropriate I-94 are acceptable “List C” documents for these noncitizens during the extension period.)

³⁹ Cf. HANDBOOK FOR EMPLOYERS 6.8, at 1-2 (Form I-797C in combination with an appropriate I-94 are acceptable “List C” documents if the I-485 is “timely filed.” USCIS instructs employers to ensure that the I-485 is “timely filed” by directing them to ensure the “received date” on the I-797C is “on or before the Form I-94 “Admit Until Date.””)

⁴⁰ *Id.* at 2.

⁴¹ *Id.*

⁴² *See id.*

⁴³ *See* 8 C.F.R. §274a.12(c)(9) (employment authorization category for noncitizens with a pending application for Adjustment of Status.)

Pending AOS: What documents are necessary to show work authorization?

Status	Documents required	How long are the alternative documents valid?	EAD card needed?
Timely filed AOS based on U-1 or U derivative status	Form I-797C showing timely U-based AOS filing and original I-94 showing U status. ⁴⁴	1 year past the expiration date of the original I-94, or until the AOS is denied or withdrawn (whichever is earlier). ⁴⁵	Not for 1 year past the expiration date on the I-94. ⁴⁶
Timely filed AOS based on T-1 status	Form I-797C showing timely T-1 based AOS filing and original I-94 showing T-1 status. ⁴⁷	2 years past the expiration date on the original I-94, or until the AOS is denied or withdrawn (whichever is earlier). ⁴⁸	Not for 2 years past the expiration date on the I-94. ⁴⁹

⁴⁴ HANDBOOK FOR EMPLOYERS 6.8, at 1-2 (Form I-797C in combination with an appropriate I-94 are acceptable “List C” documents for these noncitizens during the extension period), *see also* 8 C.F.R. §274a.2(b)(1)(v)(A)-(C) (“The individual may present **either** an original document which establishes both employment authorization and identity, **or** an original document which establishes employment authorization **and** a separate original document which establishes identity.”) (emphasis added), FORM I-9 INSTRUCTIONS (Employers “must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”)

⁴⁵ HANDBOOK FOR EMPLOYERS 6.8, at 1-2

⁴⁶ *Id.* (Form I-797C in combination with an appropriate I-94 are acceptable “List C” documents for these noncitizens during the extension period.)

⁴⁷ HANDBOOK FOR EMPLOYERS 6.8, at 1 (Form I-797C in combination with an appropriate I-94 are acceptable “List C” documents for these noncitizens during the extension period), *see also* 8 C.F.R. §274a.2(b)(1)(v)(A)-(C) (“The individual may present **either** an original document which establishes both employment authorization and identity, **or** an original document which establishes employment authorization **and** a separate original document which establishes identity.”) (emphasis added), FORM I-9 INSTRUCTIONS (Employers “must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”)

⁴⁸ HANDBOOK FOR EMPLOYERS 6.8 at 1.

⁴⁹ *Id.*

Timely filed AOS based on T derivative status	Valid EAD card. ⁵⁰	Alternative documents are not accepted. ⁵¹	Yes. ⁵²
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PRACTICE TIP:

If a client has presented to an employer an acceptable form of identity and work authorization as set forth above, and the employer demands an EAD card, practitioners are encouraged, with the client’s permission, to communicate with the employer on the client’s behalf. The practitioner may write a letter or make a similar communication to the employer that explains: 1) the client is employment authorized incident to status; 2) their status has been extended through the timely filing of the T or U-based AOS application; 3) the combination of the I-94 and I-797C are acceptable “List C” documents during the extension period; and 4) as long as the client produces an acceptable “List B” document and the aforementioned “List C” combination, the client does not have to possess an EAD card during the extension period.

For T-1s, U-1s, and U derivatives, the letter should also cite to the new section of the Handbook, which explains that an I-94 showing admission in T-1, U-1, or U derivative status, in combination with an AOS I-797C with a “received date” that is on or before the I-94 expiration date, are acceptable “List C” documents during the I-94 extension period. The letter should also cite the Form I-9 instructions, which state that the employer cannot request specific documents from the client (such as an EAD card) as long as the extension period is current, the client submits an acceptable “List B” document, and the client submits their I-94 showing admission in T-1, U-1, or U derivative status and their AOS I-797C as “List C” documents.⁵³ The practitioner is encouraged to include printouts of 8 C.F.R. §274a.12(a) (if applicable), the Form I-9 instructions, and Section 6.8 of the Handbook.

Example 1:

⁵⁰ Cf. HANDBOOK FOR EMPLOYERS 6.8, at 2.

⁵¹ Cf. *id.*

⁵² Cf. *id.*

⁵³ Cf. FORM I-9 INSTRUCTIONS, at 1 (“Employers CANNOT specify which document(s) an employee may present to establish employment authorization. The employer must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9.”) (emphasis in original.)

The original expiration date of John's T-1 I-94 was March 1, 2022. The "received date" on John's T-based AOS Form I-979C was October 1, 2021. On Form I-9, John should put **March 1, 2024** as the expiration date. Because he timely filed for AOS based on his T-1 status, John will remain employment authorized **without needing an EAD card** until March 1, 2024.

Example 2:

The original expiration date for Alex's U-2 I-94 was November 1, 2021. The "received date" on Alex's AOS Form I-797C is August 1, 2021. Alex has not received his Category (C)(9) EAD card yet. Assume that Alex has an acceptable "List B" identity document. Before November 1, 2022, Alex may present the following to his employer: his "List B" identity document and **both** the original U-2 I-94 **and** his AOS Form I-797C as a "List C" document.

If Alex's employer refuses to accept these documents and instead demands an EAD card, Alex's counsel can write a letter to the employer that makes the arguments detailed in the Practice Tip on page 10 of this Practice Advisory.

NOTE: Privacy implications

The privacy implications detailed on pages 6-7 of this Practice Advisory also apply to clients who rely on a pending, timely-filed T-1 or U-based AOS application as evidence of work authorization. Practitioners should advise clients about these privacy implications. Clients with pending adjustment applications who do not want employers to discover private information about their immigration status may wish to wait until they receive their Category (c)(9) EADs before they begin or resume working.

III. Conclusion

USCIS's I-9 Handbook for Employers contains helpful information about how T-1s, T derivatives, U-1s, and U derivatives can demonstrate employment authorization. In some cases, practitioners and clients can use the Handbook to show that a client is work authorized without an EAD card. Given EAD adjudication backlogs, practitioners are encouraged to use the Handbook to

help their clients demonstrate work authorization to their employers. However, practitioners should ensure that clients with these survivor-based immigration statuses understand the privacy implications of demonstrating work authorization without an EAD card.

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