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LAW LAB

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Re: DHS Docket No. USCIS-2019-0011, Innovation Law Lab's Comment in Response to Proposed Rulemaking: Asylum Application, Interview, and Employment Authorization for Applicants

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Innovation Law Lab submits these comments in response to the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking published in the Federal Register on November 14, 2019, by which DHS proposes to severely limit asylum seekers' eligibility for work authorization, including banning asylum seekers from legally working in the United States until their applications have been pending for at least one year.

Innovation Law Lab is a nonprofit organization dedicated to upholding the rights of immigrants and refugees. Founded in 2014 in response to the mass detention and deportation of asylum-seeking immigrant families, Innovation Law Lab specializes in the creation of scalable, highly replicable, and connected sites of resistance that create paradigm shifts in immigration representation, litigation, and advocacy. By bringing technology to the fight for immigrant justice, Innovation Law Lab empowers advocates to scale their impact and provide effective representation to immigrants in detention and in hostile immigration courts across the country. Innovation Law Lab works directly with low-income immigrants and the pro bono attorneys who serve them, providing legal services, direct representation, and tactical support before USCIS and the Executive Office for Immigration Review (EOIR).

Innovation Law Lab strongly opposes the proposed modification of the regulations, which would change employment authorization eligibility in the following ways: 1) extending the waiting period from 180 to 365 calendar days from the date of asylum application receipt; 2) eliminating the issuance of recommended approvals for a grant of affirmative asylum; 3) eliminating employment authorization eligibility for asylum seekers who entered the United States without

inspection, and for those who do not file for asylum within one year of entry to the United States, unless and until an asylum officer or immigration judge determines that an exception to the one-year deadline applies; 4) eliminating employment authorization eligibility for asylum seekers who have certain criminal convictions or pending criminal charges: 5) making employment authorization under the (c)(8) category discretionary instead of mandatory; 6) revising the provisions governing employment authorization termination; 7) changing the provisions for filing an asylum application; 8) limiting the validity of the employment authorization periods; 9) requiring the collection of biometrics, and the payment of the biometrics services fee, as part of the employment authorization application process; and 10) eliminating parole-based employment authorization eligibility under 8 C.F.R. § 274a.12(c)(11) for asylum seekers who are paroled into the United States after passing a credible or reasonable fear interview. All of these changes are unnecessary and unjustified. Particularly in light of the staggering backlog and lengthy delays in pending asylum applications before both U.S. Citizenship and Immigration Services (USCIS) and the Executive Office of Immigration Review, the proposed changes strongly suggest that the changes only mean to make life unnecessarily more challenging for persons who are lawfully seeking asylum in the United States.

I. The Proposed Changes Would Unnecessarily Delay or Preclude Employment Authorization Eligibility, Causing Significant Hardship to People Fleeing Persecution and Their Families.

The proposed rule would increase the already-lengthy six month waiting period for seeking employment authorization to 365 days. *See* 8 C.F.R. § 208.7. This lengthened wait period is wholly unnecessary and would cause significant hardship to people fleeing persecution and their families.

Delaying eligibility for employment authorization would unnecessarily postpone asylum seekers' entry into the U.S. labor force and result in the loss of desperately needed wages and benefits. The loss of income that would result from implementation of the Proposed Rule will cause disproportionate harm to an already vulnerable community and will deprive asylum seekers of the ability to afford food, housing, medical treatment, health insurance, or legal representation. Moreover, because asylum seekers often lack valid identity documents, delays in EAD adjudication would also impact asylum seekers' ability to access many social services and put them at even greater risk of exploitation and trafficking. The Proposed Rule will further delay asylum seekers' ability to work in the United States and will also vastly increase the risk that asylum seekers coming to the United States will become a public charge.

The increased delay period is particularly significant in light of the extensive backlog of asylum application adjudications before both USCIS and EOIR. As of November 2019, over a million

cases are pending before the nation's immigration courts;[1] a significant number of these cases involve claims for asylum. The average time an applicant waits for a court decision in their asylum case now exceeds two years.[2] Over 650,000 individuals in immigration proceedings are in courts where the average wait time for an individual's next hearing is three or four years.[3] And for many of these individuals, their next hearing is merely a scheduling ("master calendar") hearing, leading to even more waiting before their asylum case is finally adjudicated on its merits.[4] USCIS also has over 338,000 cases pending adjudication.[5]

These administrative delays often mean that people fleeing persecution face barriers to getting their application on file in a timely manner. Many people fleeing persecution supported by Law Lab see delays of several months - and sometimes more than a year - before their Notice to Appear is even filed with the immigration court, formally beginning their case. Given that the adjudication time period now stretches to years for the vast majority of non-detained asylum applicants, the barriers imposed by the proposed changes will wreak hardship for even greater periods of time.

DHS does not meaningful address that the proposed change will inflict serious harm on people fleeing persecution, merely noting that "individuals with meritorious claims … may also experience economic hardship …" and dismissing the "potential economic hardship" that will be inflicted in light of the "urgency to maintain the efficacy and the very integrity of the US asylum and immigration system." But lengthening the already-significant waiting period for work authorization will have devastating impact upon asylum seekers, their families, and their communities.

II. The Agency Should Not Bar from Employment Authorization People Fleeing Persecution Who Enter the United States Outside of a Port of Entry.

The proposed rule would bar asylum seekers from work authorization if they "entered or attempted to enter the United States at a place and time other than lawfully through a U.S. port of entry, absent "good cause" and the fulfillment of other requirements. Innovation Law Lab opposes this proposed change, which is in tension with U.S. law and international obligations,

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[1] TRAC, *Immigration Court Backlog Tool: Pending Cases and Length of Wait by Nationality, State, Court, and Hearing Location*, November 2019 https://trac.syr.edu/phptools/immigration/court_backlog/ (last accessed Jan. 12, 2020).

[2] Marissa Esthimer, *Crisis in the Courts: Is the Backlogged U.S. Immigration Court System at Its Breaking Point?*, Migration Policy Institute (Oct. 3, 2019), https://www.migrationpolicy.org/article/backlogged-us-immigration-courts-breaking-point.

[3] *See* TRAC Immigration, *Crushing Immigration Judge Caseloads and Lengthening Hearing Wait Times* (Oct. 25, 2019), https://trac.syr.edu/immigration/reports/579/.

[4] *Id.*

[5] Gretchen Frazee, *U.S. claims reducing refugee numbers helps with the asylum backlog. Will it?*, PBS, (Oct. 2, 2019), https://www.pbs.org/newshour/politics/u-s-claims-reducing-refugee-numbers-helps-with-the-asylum-backlog-will-it.

and would leave potentially hundreds of thousands of people fleeing persecution without the ability to support themselves during the years-long pendency of their asylum cases.

This proposed change is especially punitive in light of U.S. Customs and Border Protection's (CBP) practice of turning back people who seek safety from persecution at official points of entry and implementing a process known as "metering."[6] CBP and DHS are well aware that this practice encourages border crossings outside of lawful ports of entry.[7] These crossings often occur by necessity, as people turned back from seeking asylum at lawful ports of entry are forced to wait in some of the most dangerous conditions in the world: the State Department's travel warning for Mexico advises U.S. citizens to exercise extreme caution, or avoid travel altogether, to several of the border cities to which asylum seekers are returned.[8] Human Rights First has also reported at least 636 public reports of "rape, kidnapping, torture, and other violent attacks" against people fleeing persecution who have been forced to wait in Mexican border cities under the "Migrant Protection Protocols" program.[9] Punishing people who cross in between lawful ports of entry due to the danger they face due to the metering program is cruel, unnecessary, and inconsistent with duly enacted asylum law, which allows *any* noncitizen "physical present in the United States or who arrives in the United States" to seek asylum. 8 U.S.C. § 1158(a)(1).

Moreover, this proposed change would violate Article 31 of the Refugee Convention and Protocol, which prohibits the imposition of penalties of people fleeing persecution "on account of their illegal entry or presence," "provided they present themselves without delay to the authorities and show good cause for their illegal entry or presence."[10] "Penalties" is interpreted to have "a broad meaning and is not limited to criminal penalties, but includes any administrative sanction or procedural detriment imposed on a person seeking international protection."[11] The "good cause" exemption that DHS would allow would not mitigate the problems caused by this presumptive penalty. The agency should allow anyone who is lawfully seeking asylum in the United States to receive employment authorization during the pendency of their case, regardless of their manner of entry into the country.

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[6] *See, e.g., Al Otro Lado, Inc., v. Nielsen*, 327 F.Supp.3d 1284 (S.D. Cal. 2018).
[7] Department of Homeland Security, Office of the Inspector General, *Special Review – Initial Observations Regarding Family Separation Issues Under the Zero Tolerance Policy*, Sep. 27, 2018, *available at* https://www.oig.dhs.gov/sites/default/files/assets/2018-10/OIG-18-84-Sep18.pdf.
[8] U.S. State Department, Mexico Travel Advisory, December 17, 2019, *available at* https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/mexico-travel-advisory.html.
[9] Eleanor Acer, Rebecca Gendelman, and Kennji Kizuka, *Human Rights Fiasco: The Trump Administration's Dangerous Asylum Returns Continue*, Human Rights First, Dec. 2019, https://www.humanrightsfirst.org/sites/default/files/HumanRightsFiascoDec19.pdf.
[10] Convention relating to the Status of Refugees, Article 31, 189 UNTS 137 (July 28, 1951), *available at* www.unhcr.org/en-us/3b66c2aa10.
[11] UNHCR, "Legal considerations on state responsibilities for persons seeking international protection in transit areas of 'international' zones at airports" (Jan. 17, 2019), *available at* https://www.refworld.org/docid/5c4730a44.html.

III. The Agency Should Not Bar from Employment Authorization People Who Have Missed the One-Year Filing Deadline.

Innovation Law Lab strongly opposes the proposal to eliminate employment authorization eligibility for asylum applicants who have missed the one-year filing deadline. In Innovation Law Lab's experience, it is often the most traumatized and vulnerable people fleeing persecution who face the greatest challenges in meeting the one-year filing deadline.[12] Absent the financial resources to hire an attorney, many asylum applicants are simply unable to fill out the highly complex - and extremely important - asylum application, which is only available in English, requests significant personal information, and requires an understanding of complex legal requirements and asylum law to properly complete. Quality pro bono and low-cost legal services for asylum seekers are unavailable in many parts of the country, and overburdened and at capacity where they do exist. Indeed, the rule would penalize applicants who miss the one-year filing deadline due to lack of resources by *further* depriving them of the opportunity to acquire the resources to support themselves during the remaining pendency of their cases.

The proposed change would allow employment authorization eligibility once USCIS or an immigration judge found that an exception to the one-year filing deadline applied. But this is cold comfort in light of the fact that this determination is most often made at the final adjudication stage of an asylum case - meaning that an applicant may have waited years without employment authorization, only to later find that their late filing was entirely justified. There is no reason to delay employment authorization in such circumstances, especially, as described *supra*, in light of the significant economic hardships inflicted on asylum applicants by the denial of employment authorization.

IV. The Agency Should Not Expand Criminal Ineligibility for Employment Authorization.

The proposed regulation would significantly expand the range of criminal conduct - even when merely alleged - that would eliminate eligibility for employment authorization based on a pending asylum application. Innovation Law Lab strongly opposes these changes, which would expand criminal ineligibility beyond crimes that make an applicant ineligible for asylum itself, unfairly eliminate eligibility based on pending criminal charges, and inappropriately empower USCIS officers to make complex determinations about foreign criminal offenses and charges.

First, the proposal to eliminate employment authorization eligibility for anyone convicted of a felony is exceedingly broad and would cover many asylum applicants who are eligible to receive

[12] *See, e.g.,* Eleanor Acer, et. al., *The Asylum Filing Deadline Denying Protection to the Persecuted and Undermining Governmental Efficiency*, Human Rights First (Sept. 2010), https://www.humanrightsfirst.org/wp-content/uploads/pdf/afd.pdf.

asylum. In the United States, a felony is generally defined as any offense that is *punishable* by one year or more of imprisonment- regardless of the sentence actually imposed in a particular case. The proposed change would also create ineligibility due to convictions for "public safety offense[s] involving" domestic violence or domestic assault, child abuse neglect, controlled substances, or driving under the influence of alcohol or drugs. The proposed changes provide no useful definitions for these offenses. Imposing such a complex criminal analysis on a simple application made by mail would impose significant burdens on USCIS adjudicators, and raises concerns of due process for applicants, who may not be able to prove that their offense is not related to one of the listed topics. There is no legitimate policy reason for denying employment authorization based on such an exceedingly broad range of criminal conduct, much of which may be irrelevant to the applicant's eligibility for asylum itself.

Second, the proposed changes would give DHS discretion to refuse employment authorization eligibility to anyone with merely pending charges for certain crimes. The loss of eligibility based on unproven charges flies in the face of the presumption of innocence that it central to the United States criminal justice system. The proposal also penalizes asylum applicants who wish to assert their innocence, as defendants must often wait months or even longer for a resolution even of fairly minor criminal charges. For many asylum applicants, work authorization eligibility may thus depend on the timing of pending criminal charges, even if they are ultimately found not guilty of those charges.

Finally, the proposed changes would bar from employment authorization any asylum applicant convicted abroad of a serious non-political crime - and would give officers discretion to deny employment authorization based on a conviction for *any* foreign non-political crime, regardless of the seriousness of the offense. These measures would lead to unjustified denials of work authorization and would require the staff of USCIS service centers to engage in complicated legal and factual analysis about the "seriousness" of a crime - a challenging question under US and international law - that they are ill-equipped to undertake. These changes are particularly troubling because they take foreign convictions at face value, without accounting for corruption and abuse of the criminal system. Many asylum seekers flee countries whose governments abuse criminal prosecution as a tool for suppressing dissidents.

V. The Agency Should Not Eliminate Recommended Approvals and Make Work Authorization Decisions "Discretionary".

The proposed changes would eliminate recommended approvals of work authorization for asylum seekers who have met their evidentiary burdens, and who are merely waiting for background checks to process before they can receive a grant of asylum. Ending recommended approvals for these applicants makes no sense even based on the agency's self-professed rationale: these asylum seekers have already been found by the agency to have bona fide claims,

and must merely comply with the requisite background checks, which can take months or even years. With recommended approval, these applicants are at least immediately eligible for work authorization and can begin to rebuild their lives and integrate with their communities. There is no reasonable explanation for eliminating such approval.

Neither should the agency make work authorization decisions in this category "discretionary." The right to work and support oneself is a universal human right of utmost importance; it is especially important to people who have been displaced from their home countries due to violence and who must support themselves while seeking humanitarian protection. There is no need to add additional uncertainty and arbitrariness to this process by making approvals discretionary.

VI. The Agency Should Not Require Asylum Evidence To Be Submitted 14 Days in Advance, and Should Not Eliminate Notifications of Missed Interviews.

Innovation Law Lab opposes the proposed amendments to 8 C.F.R. § 208.4 and 8 C.F.R. § 208.9, which would require the submission of evidence to the asylum office no less than 14 days before a scheduled interviewed. Based on current scheduling practices at the asylum office, a 14-day deadline for evidence submission is entirely unworkable. In the experience of Innovation Law Lab and the legal services programs we support, many attorneys and applicants receive notice of their asylum interviews only 14 days- or even less- in advance of the interview date. Given the long delays in application adjudication, and arbitrary, often-changing scheduling practices, this change would make it almost impossible to submit updated evidence in a case.

Additionally, Innovation Law opposes the proposed changes to 8 C.F.R. § 208.10, which would eliminate the requirement that USCIS notify an applicant about a failure to appear at an asylum interview or a scheduled biometrics appointment before dismissing an application or making a referral to immigration court. Given ongoing challenges with USCIS application updates- and, again, long-pending timelines for interview scheduling in many cases- it is not uncommon for an interview or biometrics notice to be mailed to an incorrect address through no fault of the applicant. Given the extremely high stakes of asylum adjudications before USCIS, providing notice is the right thing to do and should continue.

VII. The Agency's Proposed Changes are Arbitrary and Capricious.

If adopted, the Proposed Rule would be an arbitrary and capricious exercise of authority by the DHS. Such an action would violate the Administrative Procedure Act, which requires the government to provide a well-reasoned, evidence-based justification for proposed rulemaking,

including rescission of a prior regulation.[13] When an agency's "prior policy has engendered serious reliance interests . . . [i]t would be arbitrary or capricious to ignore such matters."[14] In such cases, "a reasoned explanation is needed for disregarding facts and circumstances that underlay or were engendered by the prior policy."[15]

The Proposed Rule provides no such reasoned explanation. In justifying the Proposed Rule, the government claims that its purposes are "reducing incentives for aliens to file frivolous, fraudulent, or otherwise non-meritorious asylum applications," "disincentivizing illegal entry into the United States," and "eas[ing] . . . the administrative burdens" on USCIS. None of these justifications provides a reasoned explanation for ignoring the concerns about expedient work authorization that underlie the existing regulation.

In crafting the initial timelines for filing and processing employment authorization, the government wanted "to ensure that bona fide asylees are eligible to obtain employment authorization as quickly as possible," 62 Fed. Reg. at 10,318 (1997). Indeed, the government consciously set a 30-day processing deadline for EADs due to concern over the length of the 150-day waiting period. 50 Fed. Reg. at 14,780 (1994). While hoping that most applicants would have their applications adjudicated before that time, the government set the 150-day limit because it was a period "beyond which it would not be appropriate to deny work authorization to a person whose claim has not been adjudicated." *Id.* Thus, as explained by the federal judge in *Rosario*, the 150-day waiting period "was already—in the agency's view—an extraordinary amount of time to wait for work authorization." *See Gonzalez Rosario v. USCIS*, 365 F.Supp.3d 1156, 1160-61 (W.D. Wash. 2018). The government's prior concerns about delays of work authorization for asylum applicants are only heightened in the current context of ballooning case backlogs, as discussed above.

The agency's purported concerns about asylum fraud do not justify the rescission of the previous regulation. In passing the original regulation, the government explicitly determined that it would "adjudicate [asylum seekers'] applications for work authorization within 30 days of receipt, regardless of the merits of the underlying asylum claim." 50 Fed. Reg. at 14,780 (1994). As the court in *Rosario* explained, the government thus considered the possibility of unsuccessful asylum applications and nevertheless chose expedient processing of work authorization "above the merits of the underlying asylum claim." *Gonzalez Rosario*, 365 F. Supp. 3d at 1160–61.

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[13] "[A]n agency changing its course by rescinding a rule is obligated to supply a reasoned analysis for the change beyond that which may be required when an agency does not act in the first instance." *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 42 (1983). *See also Dept. of Commerce v. New York*, 139 S.Ct. 2551, 2567 (2019): "The Administrative Procedure Act embodies a 'basic presumption of judicial review,'" *Abbott Laboratories v. Gardner*, 387 U.S. 136, 140 (1967), and instructs reviewing courts to set aside agency action that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law," 5 U. S. C. § 706(2)(A).

[14] *F.C.C. v. Fox Television Stations, Inc.*, 556 U.S. 502, 515–16 (2009).

[15] *Id.* at 516.

Additionally, while DHS claims that "the vast majority of protection claims" are meritless, this assertion is fundamentally incorrect. The agency claims that "a historic low rate of approval of affirmative asylum applications and credible fear claims" supports their position that the majority of asylum claims are frivolous. Yet as Innovation Law Lab and other legal service providers have recently alleged in federal court, this low rate of approval is due not to meritless claims, but instead to the Trump administration's sustained weaponization of the immigration system against asylum seekers and their attorneys.[16] Rather than supporting a well-founded concern about asylum fraud, this Proposed Rule is part and parcel of the Trump administration's efforts to make the United States a hostile destination for individuals fleeing persecution in their countries of origin.

VIII. The Agency's Proposed Rule Violates the United States' International Commitments

The Proposed Rule will violate the United States' international commitments by furthering the Trump Administration's systemic attacks on asylum seekers and undermining the internationally recognized right to work.

A. The Proposed Rule Is Part of the Trump Administration's Systematic Effort to Deter Asylum Seekers

The Trump administration has enacted numerous harmful policies aimed at undermining the legal rights of asylum seekers. This Proposed Rule is yet another attempt to impose an unwarranted barrier on asylum seekers in an effort to prevent individuals fleeing violence from exercising their internationally recognized right to seek asylum.These efforts include the administration's metering policy, which dramatically reduces the number of asylum seekers who are inspected and processed at ports of entry along the U.S.-Mexico border, as well as the "Remain in Mexico" policy and the third-country transit rule.

The government must take care that it implements its regulations in a manner that does not violate the United States' commitment to facilitate the protection of meritorious asylum seekers.[17] By sabotaging the asylum system, the Trump administration has instead made a mockery of the United States' international reputation as a country that respects human rights and the rule of law.

B. The Proposed Rule Contradicts the Internationally Recognized Right to Work

[16] *See Las Americas v. Trump*, 3:19-cv-02051-SB (D. Or. filed Dec. 18, 2019).
[17] *See* United Nations High Commission for Refugees, 1951 Convention Relating to the Status of Refugees, 30–31, *available at* http://www.unhcr.org/en-us/3b66c2aa10.

The right to work is an internationally recognized human right enshrined in the Universal Declaration of Human Rights and international law recognizes the right to work as a vital foundation for the realization of other human rights, such as the right to life. The right to work is incorporated into the International Covenant on Economic, Social and Cultural Rights (ICESCR), a binding international treaty. Article 6 of the ICESCR provides that all individuals, regardless of citizenship status, have the right to the opportunity to earn a living by work freely chosen or freely accepted.[18] The Committee that oversees the compliance of ICESCR has confirmed that this right applies "to everyone including non-nationals, such as refugees, asylum seekers, stateless persons, migrant workers and victims of international trafficking, regardless of legal status and documentation." *Id.* The right to work is further enshrined in Article 45 of the Organization of American States (OAS), Article XIV of the American Declaration on the Rights and Duties of Man, and Article 6 of the Additional Protocol to the American Convention on Human Rights in the Area of Economic, Social and Cultural Rights. The Office of the United Nations High Commissioner for Human Rights (UNHCHR) directs nation states to grant asylum-seekers the right to work during the pendency of their cases.

The proposed changes curtailing asylum seekers' access to employment authorization are contrary to these well-recognized international laws and standards.

IX. The Agency's Proposed Rule Is Harmful to National Interests and the Public Welfare

The proposed rule is harmful to both the national interest and the public welfare. Restricting work authorization for asylum applicants would harm the country's economy and society.

First, as USCIS itself has conceded, government agencies across sectors will lose tax revenue under the proposed rule change. The refusal of work authorizations will prevent persons with pending asylum applications from earning income out of which they pay taxes, and will also limit contributions to programs like Medicare and Social Security. The loss projections are huge: the agency itself predicts a loss of earnings from between $1.19 billion and $3.6 billion, and a corresponding lack in annual tax transfers from $182 million to $550.9 million.

Second, by delaying eligibility for work authorization, the proposed rule change will move persons with pending asylum applications away from economic independence and towards reliance on charitable programs and other social safety networks.

Third, as USCIS concedes, lack of work authorization may push asylum seekers into the informal labor market out of a desperate need to support their families during the months and even years of their asylum proceedings. Placing asylum seekers in this position makes them an

[18] *See* UN General Assembly, *International Covenant on Economic, Social and Cultural Rights, International Covenant on Civil and Political Rights and Optional Protocol to the International Covenant on Civil and Political Rights*, 16 December 1966, A/RES/2200, *available at* https://www.refworld.org/docid/3b00f47924.html.

even more vulnerable population, greatly expanding the potential for workplace abuses and human trafficking.

X. Conclusion

For the above stated reasons, Innovation Law Lab strongly opposes the government's Proposed Rule. In addition to its arbitrary and capricious nature, if allowed to take effect, the Proposed Rule will cause untold harm to asylum-seeking individuals and their families, contradict our international commitments, and undermine our national interests and public welfare.

Thank you for the opportunity to submit these comments. Please do not hesitate to contact us should you have any questions about our comments or require further information.

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