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RE: RIN 1615-AC97; CIS No. 2799-25; DHS Docket No. USCIS-2025-0370, Public Comment Opposing Proposed Rulemaking on Employment Authorization Reform for Asylum Applicants

The Unitarian Universalist Service Committee (UUSC) writes to convey our strong opposition to the Notice of Proposed Rulemaking on Employment Authorization Reform for Asylum Applicants. We urge you to **withdraw this rule in its current form and to uphold the right of asylum-seekers to access work permits** during the pendency of their removal proceedings, consistent with Congress’s original design.

UUSC is a U.S.-based human rights organization with over 85 years’ experience working in solidarity with people in conditions of migration and forced displacement. After its founding in 1940, UUSC assisted refugees escaping Nazi-occupied Europe during World War II. Up to the present, we have continued to partner with people forced to flee their homes due to war, persecution, genocide, and environmental destruction.

Emerging from the bloodshed of the Second World War and the Holocaust, the United States and other nations around the world pledged that **never again would people facing persecution be forcibly returned to the hands of their oppressors**. Instead, many governments of the world—including our own—recognized a legal obligation to provide refuge for people who manage to reach their territory and petition for safety from torture or identity-based persecution in their countries of origin.

Congress established the asylum program in 1980 in order to embody these aspirations in law. The aim of this statute was to provide a fair, equitable, and formalized procedure to access safety in the United States for people experiencing persecution because of who they are and what they believe. **The principles of this law hearken to what is best in our nation’s shared ideals**, including the words inscribed in the Statue of Liberty, which declare the United States to be the “mother of exiles.”

The proposed rule—in its current form—would turn this congressional intent on its head. Because processing of EAD applications wouldn’t resume until asylum application processing times are drastically reduced, which could take many years, the vast majority of future asylum applicants will be deprived of the opportunity to work lawfully while awaiting the outcome of their immigration cases. **The rule would thus make it all but impossible for most asylum seekers to obtain humanitarian protection**, as people would be forced to abandon their asylum cases in order to survive. Thousands of families would be thrust into poverty, danger, or exploitation as a result, despite following all lawful procedures to access their rights under the statute Congress designed.

The rule as written would thereby effectively abolish asylum in all but name and make a hollow mockery of our government’s promise to provide a pathway to legal protection for people escaping persecution. This cannot be what lawmakers intended when they passed the 1980 Refugee Act into law; and it is not what the American people expect of our government now. People seeking asylum deserve the chance to survive and thrive while making their case for refuge—not to be punished for nothing more than requesting protection in a manner consistent with our laws and values.

Our organization works with congregations around the country that work directly with asylum seekers, helping them to integrate into their new communities while they wait for their asylum cases to be processed. We have seen firsthand how eager those seeking safety are to work and not rely on others for support. **They want to**

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contribute to their communities, find dignity in work, and make vital social and economic connections.
There is no reason to deny these rights.

The first six months that asylum seekers currently have to wait to receive employment authorization is already an incredible burden. **Trying to feed and house one's family with no income is almost impossible for those who have fled their home countries in pursuit of safety.** The new rule would require doubling this wait, at a minimum, which means that organizations like ours, local churches, and other civil society groups would be unlikely to meet the need. Our infrastructure to support people in search of support will be overly taxed.

Asylum seekers deserve the same chance as any other members of our community to support themselves and their families. Depriving them of these opportunities is needlessly cruel, punitive, and in conflict with our values as people of faith and conscience. **We urge you to reconsider this rule and halt it from ever taking effect.**

Sincerely,

The Unitarian Universalist Service Committee

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