International Institute of New England

July 13, 2020

Submitted via www.regulations.gov

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Office of Information and Regulatory Affairs,
Office of Management and Budget,
725 17th Street NW, Washington, DC 20503;
Attention: Desk Officer, U.S. Citizenship and Immigration Services, DHS

RE: RIN 1125-AA94 or EOIR Docket No. 18-0002
International Institute of New England's Public Comment Opposing the Proposed Rule, Procedures for Asylum and Withholding of Removal; Credible Fear and Reasonable Fear Review.

Our organization, the International Institute of New England ("IINE"), submits this public comment in opposition to the above-referenced Notice of Proposed Rulemaking (NPRM) and urges the Department of Justice ("DOJ") and Department of Homeland Security ("DHS") to withdraw these proposed rules in their entirety.

Asylum is a lifeline for tens of thousands of vulnerable refugees, and these proposed regulations not only violate the United States' duties under domestic law and international law but will eviscerate the ability of countless men, women and children to obtain asylum in the United States.

Just as importantly, these rules, which would eliminate asylum for the vast majority of asylum seekers, are morally wrong—if these rules are published as written, the United States will cease to be a leader in providing humanitarian protection and protecting the most vulnerable. We urge you not to allow that to happen.

IINE's mission is to create opportunities for refugees and immigrants to succeed through resettlement, education, career advancement and pathways to citizenship. IINE is a nonprofit serving the refugee and immigrant communities of New England by providing humanitarian relief, English language learning, employment, skills training, and citizenship programs. In fact, in 2019 alone we served over 2,500 people from 102 different countries, many of which were asylees.

The United States has a long history of protecting those escaping danger, yet the NPRM seeks to target the most vulnerable individuals fleeing to the U.S. in search of safety. The rule imposes new barriers at every stage of the process that will be impossible to meet for the vast majority of asylum applicants, resulting in scores more asylum seekers being returned to harm. **We oppose these regulations in their entirety and call upon the agencies to withdraw them immediately**.

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We Strongly Object to the Agencies Only Allowing 30 Days to Respond to Comment on the Notice of Proposed Rulemaking (NPRM)

As discussed below, the proposed regulations would completely eviscerate asylum protections. These regulatory changes seek to rewrite the laws adopted by Congress and would be the most sweeping changes to asylum since the 1996 overhaul of the Immigration and Nationality Act, Illegal Immigration Reform and Immigration Responsibility Act ("IIRIRA"). The NPRM is over 160 pages long (*emphasis added*) with more than 60 of those pages being the proposed regulations themselves—including dense, technical language and sweeping new restrictions that have the power to send the most vulnerable back to their countries where they may face persecution, torture, or death. Any one of the sections of these regulations, standing alone, would merit 60 days for the public to fully absorb the magnitude of the proposed changes, perform research on the existing rule and its interpretation, and respond thoughtfully. Instead, the agencies have allowed a mere 30 days to respond to multiple, unrelated changes to the asylum rules, issued in a single, mammoth document.

Under any circumstances, it would be wrong for the government to give such a short time period to comment on changes that are this extensive, but the challenges to respond to the NPRM now are magnified by the ongoing COVID-19 pandemic. Our organization has been working from home since March 13, 2020 due to the outbreak in Boston and the surrounding areas. Our staff, clients and community partners were all affected and our daily lives have changed drastically. For many, time is limited due to overwhelming client needs, childcare, and the challenges of remote work. To limit the comment period for this NPRM to 30 days when there is over 160 pages of information to analyze and digest while in the midst of a global pandemic is unconscionable.

For this procedural reason alone, we urge the administration to rescind the proposed rule. If it wishes to reissue the proposed regulations, it should grant the public at least 60 days to have adequate time to provide comprehensive comments.

We Strongly Object to the Substance of the Entire Proposed Rule and Urge the Administration to Rescind it in its Entirety

Although we object to the agencies' unfair 30-day timeframe in which to submit a comment to the proposed rule, we submit this comment, nonetheless, because we feel compelled to object to the proposed regulations which would gut asylum protections. The proposed rules would result in virtually all asylum applications being denied, by removing due process protections, imposing new bars, heightening legal standards, changing established legal precedent, and creating sweeping categories of mandatory discretionary denials. In a best case scenario, the result of these changes would be to leave a higher percentage of those fleeing harm in a permanent state of limbo, if they are able to meet the higher legal standard to qualify for withholding of removal under INA § 241(b)(3). Since those who qualify for withholding of removal have no ability to petition for derivative beneficiaries, these rules would result in permanent family separations.

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As noted above, we may have not covered every topic which we would like to have covered because of the constricted timeframe in which to respond, however we strongly object to each and every proposed change.

8 CFR § 1208.13 (e)—The Proposed Rule Would Deprive Asylum Seekers of Their Day in Court

Section 8 CFR § 1208.13 (e) would allow immigration judges to deny asylum to asylum seekers without even allowing them a hearing or chance to testify, if judges determine, on their initiative or at the request of a DHS attorney, that the application form does not adequately make a claim. This radical change would allow judges to "pretermit" asylum claims.

Allowing judges to "pretermit" claims and deprive asylum seekers, many of whom do not have lawyers and do not speak English fluently, at the same time that the administration again changes and further restricts the eligibility criteria for asylum through this proposed rule and prior rules and decisions, would deny them due process and would be an abrupt change from decades of precedent and practice before the immigration court. *See Matter of Fefe* 20 I&N Dec. 116, 118 (BIA 1989) ("In the ordinary course, however, we consider the full examination of an applicant to be an essential aspect of the asylum adjudication process for reasons related to fairness to the parties and to the integrity of the asylum process itself.")

Many asylum seekers, especially those who are unrepresented and those who are detained, struggle to complete the 12-page asylum application form at all. They may have to use unofficial translators with whom they fear sharing intimate details of their past or their present fears. Asylum seekers who are detained and do not speak English fluently may be unable to secure any assistance in filling out the application. And, in any event, asylum seekers are often not well-versed in the complexities of the U.S. asylum system and cannot be expected to lay out every element of their asylum claims in the application before arriving in court. Allowing immigration judges to deny asylum cases without even taking any testimony or looking beyond the asylum application would inevitably lead to meritorious cases being denied and vulnerable asylum seekers being returned to harm. We oppose this proposed change in the strongest possible terms.

8 CFR § 208.1(c); 8 CFR § 1208.1(c)— The Proposed Rule Will Make it Virtually Impossible to Prevail on a Particular Social Group Claim

Applicants for asylum and withholding of removal are legally required to demonstrate that the persecution they fear is on account of a protected characteristic: race, religion, nationality, membership in a particular social group (PSG), or political opinion. INA § 101(a)(42). Membership in a particular social group in this list was designed to allow the refugee definition to be flexible and capture those who do not fall within the other listed characteristics. "The term membership of a particular social group should be read in an evolutionary manner, open to the diverse and changing nature of groups in various societies and evolving international human rights norms." United Nations High Commissioner on Refugees (UNHCR) Guidelines On International Protection: "Membership of a particular social group" within the context of Article 1A(2) of the 1951 Convention and/or its 1967 Protocol relating to the Status of Refugees, May 7, 2002,

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https://www.unhcr.org/en-us/publications/legal/3d58de2da/guidelines-international-protection-2-membership-particular-social-group.html.

These regulations would essentially make it impossible for asylum seekers, especially those from Central America and Mexico, to win protection based on particular social group membership. The section on PSG prohibits a favorable adjudication of a PSG asylum claim based on issues unrelated to its cognoscibility, such as "presence in a country with generalized violence or a high crime rate"—restrictions that appear calculated to target individuals from these countries.

One of the most unfair aspects of this proposed rule is its requirement that an asylum seeker state with exactness every PSG before the immigration judge or forever lose the opportunity to present the PSG, even after receiving ineffective assistance of counsel. This is morally wrong.

An asylum seeker's life should not be dependent on an applicant's ability to expertly craft arguments in the English language in a way that satisfies highly technical legal requirements; the asylum officer or immigration judge has a duty to help develop the record. It would be unconscionable to send an applicant back to persecution for failure to adequately craft PSG language. Applying this proposed regulation to asylum seekers, including unrepresented individuals, would raise serious due process issues.

8 CFR § 208.1(d); 8 CFR § 1208.1(d)—The Proposed Rule Redefines Political Opinion Contravening Long-Established Principles

The proposed rule would redefine "political opinion" in contravention of existing law. The proposed rule states that political opinion claims can only be based on "furtherance of a discrete cause related to political control of a state or a unit thereof." The proposed rule goes on to explicitly reject the possibility that applicants' expression of opposition to terrorist or gang organizations can qualify as a political opinion, unless the asylum seeker's "expressive behavior" is "related to efforts by the state to control such organizations or behavior that is antithetical to or otherwise opposes the ruling legal entity of the state or a legal sub-unit of the state." However, this restriction utterly fails to recognize that many asylum seekers flee their homelands precisely because the government of their country is unable or unwilling to control non-state actors such as international criminal organizations.

The proposed rule's redefinition of political opinion in the narrowest possible way contradicts existing case law, and will send many bona fide asylum seekers back to harm's way. For example, women holding feminist political opinions that men do not have the right to rape them, or indigenous people who oppose gangs' taking their land would be barred from meeting the political opinion definition under this rule. Rather than following precedent that recognizes political opinion in such circumstances, the agencies seek to erase all precedent that is favorable to asylum seekers through this rule.

8 CFR § 208.1(e); 8 CFR § 1208.1(e)— The Proposed Rule Narrowly Defines Persecution, Impermissibly Altering the Accepted Definition

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The most fundamental aspect of asylum law is the obligation of countries to protect individuals with well-founded fears of persecution from being returned to harm. *I.N.S. v. Cardoza-Fonseca*, 480 U.S. 421, 428, (1987). The proposed rule would, for the first time, provide a regulatory definition of persecution—a definition that would unduly restrict what qualifies as persecution. The rule emphasizes that the harm must be "extreme" and that threats must be "exigent." But the proposed rule fails to provide any guidance on adjudicating claims by children who may experience harm differently from adults. It also does not require adjudicators to consider cumulative harm. As a result, applicants who have suffered multiple "minor" beatings or multiple short detentions would likely be disqualified under the proposed rule.

8 CFR § 208.1(f); 8 CFR § 1208.1(f)—The Proposed Rule Imposes a Laundry List of Anti-Asylum Measures Under the Guise of "Nexus"

Some of the most restrictive aspects of the proposed rule are laid out in the section titled "Nexus." Although courts have long held that each asylum application should be adjudicated on a case-by-case basis, the proposed rules would allow blanket denials of claims that have long been found to meet the standard for asylum. This section of the proposed regulation is essentially an anti-asylum wish list, directing adjudicators to deny most claims.

Specifically, this section states that in general, asylum claims should be denied where there is: "(i) Interpersonal animus or retribution." But asylum is defined as seeking to overcome a characteristic, so virtually *all* asylum involves "retribution," a word that is generally synonymous with "punishment.

The rule provides a further laundry list of harms that adjudicators generally should not consider in their nexus analysis. Among these harms is "criminal activity." However, virtually all harm that rises to the level of persecution could be characterized as "criminal activity," since in virtually every country beatings, rape, and threatened murder is criminalized activity. This blanket rule essentially eliminates the ability to grant asylum based on private actor harm.

The proposed rule would also virtually categorically eliminate gender as a ground for asylum. The NPRM does not explain why gender is listed under nexus rather than under particular social group—maybe because it is clear that gender satisfies the three-prong test for PSG of immutability, particularly and social distinction. In any event, a categorical denial of all cases where gender is part of the nexus is antithetical to the case-by-case analysis required under asylum law. Gender is similar to other protected characteristics like race and nationality, and adjudicators should determine on an individual basis whether the facts of a given case meet the standard.

Finally, the rule in its current form runs contrary to the INA. INA § 208(b)(1)(B)(i) specifically states that a protected ground must be "at least one central reason" for the harm. Federal courts have explicitly held that the "one central reason" continues to allow for a mixed motive analysis. If this rule is published in its current form, asylum seekers who have been harmed, or fear harm, for more than one reason—"retribution" and a protected characteristic—will not be afforded asylum protection in direct violation of the INA.

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8 CFR § 208.13(b)(3); 1208.16; 8 CFR § 208.13(b)(3); 1208.16—The Proposed Rule Redefines the Internal Relocation Standard, Greatly Increasing the Burden on Those Seeking Protection

The proposed rule lays out a standard for analyzing the reasonableness of internal relocation that almost no applicant for asylum, withholding of removal or Convention Against Torture (CAT) protection will be able to meet. Under the new rule, the adjudicator must take into consideration "the applicant's demonstrated ability to relocate to the United States in order to apply for asylum." 8 CFR § 208.13(3); 8 CFR § 1208.13(3). The clear implication of this language is that if an asylum seeker is able to travel to reach the United States, any testimony about the unreasonableness of relocating within their country of origin can be discounted. But this proposed rule completely ignores the fact that asylum seekers make the journey to the United States because they believe they will be safe here and do not trust their own government to protect them.

The proposed rule also implies that if an asylum seeker comes from a large country, or if the persecutor lacks "numerosity," the applicant should be able to relocate internally. We strongly oppose this language. Asylum applications should be adjudicated on a case-by-case basis and the regulations should not suggest justifications to deny applications of bona fide asylum seekers.

Significantly, the new rule would remove important considerations that adjudicators must currently take into account. Currently adjudicators must consider numerous factors, including, "whether the applicant would face other serious harm in the place of suggested relocation; any ongoing civil strife within the country; administrative, economic, or judicial infrastructure; geographical limitations; and social and cultural constraints, such as age, gender, health, and social and familial ties." Existing rule at 8 CFR § 208.13(3); 8 CFR § 1208.13(3). The new rule would force adjudicators to make decisions in a vacuum ignoring the overall context of an applicant's plight.

The new rule also would require the applicant to prove that they cannot reasonably relocate even if they have already suffered persecution if the persecutor is deemed "non-governmental." 8 CFR § 208.13(3)(iv); 8 CFR § 1208.13(3)(iv). It is unfair to impose this greater evidentiary burden on asylum seekers who have already undergone persecution and proven that the government is unable or unwilling to protect them.

8 CFR § 208.13; 8 CFR § 1208.13—The Proposed Rule Imposes a Laundry List of Anti-Asylum Measures Under the Guise of "Discretion"

In addition to meeting the legal standard, asylum seekers must merit a favorable exercise of discretion. *I.N.S. v. Cardoza-Fonseca,* 480 U.S. 421, 423, (1987). For decades, the United States has recognized the unique situation of asylum seekers and found that "the danger of persecution should generally outweigh all but the most egregious of adverse factors." *Matter of Pula*, 19 I&N Dec. 467, 474 (BIA 1987). The proposed rule would turn on its head years of jurisprudence to deny most asylum applications on discretionary grounds and severely limiting the actual discretion adjudicators' exercise, and must be rescinded.

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Under the proposed rules, any asylum seeker who enters or attempts to enter the United States without inspection could be denied asylum as a matter of discretion. Additionally, the rule would add another bar, preventing most refugees who spent 14 days in any country en route to the United States from qualifying for asylum. This change would conflict with the concept of firm resettlement, and would disqualify most asylum seekers who travel through Mexico where the administration blocks asylum seekers, forcing them to wait for months to request protection at ports of entry. These rules place asylum seekers in an impossible position where they will be denied asylum if they wait on the "metering" lists at a ports of entry but will also be denied asylum if they cross the border in order to make their requests for protection.

Similarly the rule would allow an immigration judge to deny asylum to a refugee who uses or attempts to use fraudulent documents to enter the United States, unless they are arriving to the United States directly from their country of origin. This punitive rule change would deny many legitimate asylum seekers the ability to seek protection. Often those fleeing harm are unable to obtain travel documents because they fear their government. In some countries women cannot apply for passports unless a male family member signs off on the application. The safety of these asylum seekers would now depend on whether the individual was able to obtain a direct flight to the United States.

The proposed rule also contradicts the plain language of INA § 208(a)(2)(d), which explicitly allows an exceptions to the one year filing deadline for asylum based on changed or extraordinary circumstances by barring any asylum seeker who has been in the United States for more than one year without lawful status. This rule change ignores the fact that some individuals are in the United States for many years with no need to seek asylum until there is a changed circumstance in their country of origin or personal circumstances. Likewise, many asylum seekers are prevented by extraordinary circumstances, including mental health issues such as post-traumatic stress disorder often as a result of the persecution they have fled, from filing for asylum within one year of arriving in the United States. The administration cannot eliminate these vital exceptions to the one-year-filing deadline in the guise of "discretion."

The proposed rule would further generally require denial of asylum applications if an asylum seeker did not file taxes prior to applying for asylum. Payment of taxes is in no way related to whether or not a person would suffer persecution in their home country. Moreover, many asylum seekers are forced to work in the informal economy because they are not eligible for work authorization, which the administration is even now further restricting, and may be unable to file taxes until they can obtain an employment authorization document and a social security number.

Through recently published regulations, the administration has imposed further limitations on asylum seekers' ability to obtain work authorization at all, and for those who do qualify, would make them wait for at least a year after filing for asylum to qualify for "asylum pending" work authorization. *See* 8 CFR 208.7(a)(1)(ii).

This places asylum seekers in an impossible position. Based on the administration's new rules, they cannot work with authorization until more than a year after their asylum claim is made, yet they are expected to file taxes before applying for asylum. How is that possible? Or even logical?

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8 CFR § 208.15; 8 CFR § 1208.15— The Proposed Rule Redefines "Firm Resettlement" to Include Those Who Are Not Firmly Resettled

The proposed regulation would expand the definition of firm resettlement. Under the new rule, if the asylum seeker has resided in another country for a year or more, even if there is no offer or pathway to permanent status, the asylum seeker would be considered firmly resettled and barred from asylum. There is no exception based on the asylum seeker's inability to leave the third country based on being trafficked, based on being unable to leave for financial reasons, or based on fear of remaining in the third country.

8 CFR § 208.20; 8 CFR § 1208.20—The Proposed Rule Radically Redefines the Definition of Frivolous and May Prevent Asylum Seekers from Pursuing Meritorious Claims

The proposed rule would also redefine the meaning of a "frivolous" asylum application. Under the new rule an asylum seeker could be charged with filing a "frivolous" application, and thereby be subject to one of the harshest bars in immigration law (*see* INA § 208(d)(6)), and rendered ineligible for any form of immigration relief in the future, if the adjudicator determines that it lacks "merit" or is "foreclosed by existing law." However, as discussed above, "existing law" in asylum is in a state of constant flux. Moreover, 8 C.F.R. 1003.102(j)(1), specifically states that a filing is not frivolous if the applicant has "a good faith argument for the extension, modification, or reversal of existing law or the establishment of new law, and is not interposed for any improper purpose." Under the proposed rule, an asylum seeker whose application would likely be denied under a restrictive interpretation of asylum by the BIA or attorney general precedent, who intends to challenge that precedent in federal court, must risk a finding that would forever bar any immigration relief if that appeal is unsuccessful.

8 CFR § 208.20; 8 CFR § 1208.20—The Proposed Rule Impermissibly Heightens the Legal Standards for Credible and Reasonable Fear Interviews and Will Turn Away Refugees Without Providing Them a Full Hearing

The proposed rule would also make it significantly more difficult for asylum seekers subject to expedited removal to have their request for asylum fully considered by an immigration judge. When Congress added expedited removal to the INA, it intentionally set the standard for the credible fear interview—significant possibility—low so that genuine refugees are not deported to persecution. Under this rule, the government redefines the broad "significant possibility" standard to mean "a substantial and realistic possibility of succeeding." This language contradicts the clear language of "significant possibility" that Congress set forth at INA § 235(b)(1)(B)(v) and is therefore *ultra vires*.

The proposed rule would also greatly increase the burden on those who would be eligible for only withholding of removal or protection under CAT to pass an initial interview and pursue their claim before an immigration judge. Under the proposed rule, asylum seekers who would be subject to a bar on asylum, presumably including those recently promulgated by the administration such as the "transit ban" found at 8 CFR § 208.13 (c)(4)(ii) that bar the vast majority of asylum seekers

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arriving at the southern border, would have to meet this significantly heightened requirement to even be permitted to have their case heard before an immigration judge. With these provisions in the proposed rules, the government would essentially eliminate the "significant possibility" legal standard adopted by Congress in the INA and replace it with a higher "reasonable possibility" standard, which is far more difficult for asylum seekers to meet.

Conclusion

These proposed rules represent a radical rewriting of the U.S. asylum system. Each section of these monumental proposed changes merits a full 60-day comment period for the public to adequately prepare comments. Taken together, these proposed rules would eviscerate asylum protections that have been in place in the United States for decades. The vast majority of asylum seekers are likely to be denied asylum under these proposed rules even if they have well-founded fears of persecution. Further, it is difficult to imagine any asylum seeker arriving at the southern border who would not be subject to one of the bars imposed under these, and prior, recent rules, or who would be able to meet the elevated evidentiary burdens, both in preliminary border fear screenings and in asylum interviews and proceedings before immigration judges.

The regulation would give immigration judges and asylum officers greater leeway to throw out requests for asylum as "frivolous," and to deny applications without so much as a hearing. Because eligibility for asylum is a complicated legal question, the impact of this rule would fall most harshly on unrepresented asylum seekers, limiting asylum only to those with substantial financial means or lucky enough to obtain legal counsel.

The new regulation would also ban from asylum many people who submit their applications more than a year after arriving in the United States with no exceptions. **This explicitly violates provisions of the Immigration and Nationality Act, passed by Congress.** The rule also punishes asylum seekers who fail to report even one penny of income to the IRS, even unintentionally, by stripping them of their right to ever become an American through asylum.

This regulation attempts to completely dismantle nearly every aspect of our asylum laws and seeks to eliminate critical pathways to humanitarian relief that our laws were designed to protect. The rule strikes at the very heart of our historic commitment to providing safe haven to people fleeing persecution and calls into question our integrity as a country. We call upon the administration to withdraw these proposed rules in their entirety.

Sincerely,

INTERNATIONAL INSTITUTE OF NEW ENGLAND

By: Chiara A St. Pierre, Esq.
Its: Managing Attorney, Immigration Legal Services

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