

Alejandro N. Mayorkas  
Secretary  
U.S. Department of Homeland Security

The Honorable Merrick B. Garland  
Attorney General of the United States  
U.S. Department of Justice

Re: Agency/Docket Numbers: USCIS Docket No. USCIS-2024-0006; A.G. Order No. 5943-202: Securing the Border

Dear Secretary Mayorkas and Mr. Attorney General:

respectfully submit these comments in response to the interim final rule (IFR) entitled “Securing the Border” by the Department of Homeland Security (DHS) and the Department of Justice (DOJ) initially published on June 7, 2024.

### I. Interest in the Proposed Rule

is part of a diverse community that serves asylum seekers, asylees, and other migrants. strives for a welcoming and inclusive environment for people from all walks of life, whether through direct services, advocacy, or community building, it seeks to create connections that uplift and empower everyone. expresses disappointment and disagreement with this IFR because everyone deserves a safe place to call home; the United States should be a leader in humanitarian protection; and asylum seekers help communities prosper.

### II. Everyone Deserves a Safe Place to Call Home.

The world is facing the greatest displacement crisis in history. As of May 2024, more than 120 million people have been forcibly displaced worldwide. There are nearly 45 million people in need of international protection—like asylum—with three in four coming from Afghanistan, Venezuela, Syria, Ukraine, and Sudan. There are nearly 70 million internally displaced persons. And 75 percent of those needing international protection are hosted in low and middle-income countries.

What is the United States doing to support these individuals? What is the United States doing to help refugees and asylum seekers in the Americas? Instead, this IFR reduces access to asylum in the United States—a human right enshrined in international and domestic law. The changes to asylum policy will mean that some people will be deported into harm’s way when they might have otherwise been able to successfully secure asylum.

The United States has the capacity and resources to support asylum protections. We can—and should— welcome asylum seekers, families, and children who are just trying to find a safe place to call home.

### III. The United States Should be a Leader in Humanitarian Protection

The United States is a leader in humanitarian protection and the programs we have set a standard for other countries to model. The U.S. asylum system highlights our values of opportunity, liberty, and fairness, especially for the most vulnerable. Why have we decided that America is no longer a place where huddled masses yearning to breathe free can find refuge and safety?

The systematic stripping of access to humanitarian protection, seen through this IFR, runs counter to our nation's long-standing tradition of providing refuge to those fleeing persecution. By limiting humanitarian protection, we not only betray our values but also undermine our credibility as a global leader in promoting human rights and dignity.

"Our strength is not just the example of our power, but the power of our example. Let's remember the world is watching," said President Biden in his [2023 State of the Union Address 2023](#). The responsibility of a fair and just immigration policy not only falls on Congress but also on the Administration and federal agencies. How DHS and DOJ treat asylum seekers and migrants today will impact countless people fleeing unspeakable harm. It will also shape how other countries react to humanitarian crises.

### IV. Asylum Seekers Help Communities Prosper

\_\_\_\_\_ has seen asylum seekers, asylees, and migrants play a vital role in the community it serves. Our clients bring diverse skills, perspectives, and cultural richness. They help local economies by creating new businesses and job opportunities and fostering economic growth. They also provide unique perspectives and cultural insights that enhance community life, promoting greater understanding and collaboration among residents. By integrating and supporting asylum seekers, asylees, and migrants, communities can build a more dynamic, resilient, and inclusive environment that benefits everyone.

Please focus on solutions that establish standardized, transparent, and humane procedures for asylum seekers, including access to legal representation and mental health services, rather than implementing policies that will only increase confusion at the border and harm asylum seekers. [name of your organization] appreciates the opportunity to submit comments regarding the IFR.

Sincerely