

Submitted via www.regulations.gov

June 4, 2024

Charles Nimick
Chief, Business and Foreign Workers Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive, Camp Springs, MD 20746

Re: Department of Homeland Security (DHS) Docket No. USCIS–2024–0002, Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Employment Authorization Document Renewal Applicants

Dear Chief Nimick:

The National Immigration Project (NIPNLG)¹ submits the following comment in response to the U.S. Citizenship and Immigration Services (USCIS) request for comment on the Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Employment Authorization Document (EAD) Renewal Applicants, 89 Fed. Reg. 24628 (Apr. 8, 2024) (to be codified at 8 C.F.R. pt. 274a) (DHS Docket No. USCIS–2024–0002). On July 5, 2022, NIPNLG submitted comments in support of a similar rule (DHS Docket No. USCIS-2022-0002) extending the validity of EADs, and the reasoning for the need for this rule remains the same.

NIPNLG is a national nonprofit membership organization that provides support, referrals, and legal and technical assistance to attorneys, community organizations, families, and advocates seeking to advance the rights of noncitizens. NIPNLG focuses especially on the immigration consequences of criminal convictions, and its mission is to fight for justice and fairness for

¹ The authors of this comment are NIPNLG supervising attorney, Victoria Neilson Director of Legal Resources and Training, Michelle N. Méndez. As discussed below, the comment draws, in part, from recommendations made in the Ready to Stay Administrative Advocacy Working Group, *Report Card on the Biden Administration's Efforts to Reduce Barriers to Accessing Benefits Through USCIS* (May 4, 2022) https://nipnl.org/sites/default/files/2023-11/2022_June-report-card.pdf. [Hereinafter “RTS Report Card.”]. The Working Group was chaired by the National Immigration Project (NIPNLG) and included as members: Black Alliance for Just Immigration (BAJI); Coalition for Humane Immigrant Rights (CHIRLA); Catholic Legal Immigration Network Inc. (CLINIC); Faith in Action; Immigrant Advocates Response Collaborative (I-ARC); Immigrant Legal Resource Center (ILRC); Immigrant Welcome Center; National Immigration Law Center (NILC); Massachusetts Immigrant and Refugee Advocacy Coalition (MIRA); National Immigrant Justice Center (NIJC); Presente.org; and UnidosUS.

noncitizens who have contact with the criminal legal system. Additionally, we fight for fairness and transparency in immigration adjudication systems and believe that all noncitizens should be afforded the right to fair adjudications of their claims to remain in the United States. The right to work is fundamental and this right is especially important for marginalized noncitizens who may be forced into dangerous jobs if they are not authorized to work lawfully. Some of this work in the informal economy may, in turn, lead to more encounters with law enforcement, particularly for noncitizens who are Black, Indigenous, and people of color (BIPOC).

NIPNLG commends USCIS for its decision to issue a rule that extends the validity period of certain EADs to 540 days while noncitizens seek to have those EADs renewed. USCIS is facing significant backlogs in numerous adjudication categories, and NIPNLG strongly supports this rule which allows noncitizens to continue to engage in work lawfully, rather than face economic deprivation based on USCIS delays. NIPNLG will first discuss each of the three specific questions on which USCIS is seeking input. We will then explain why USCIS should also eliminate the “asylum clock” in EAD adjudications as a means to more efficiently use agency and advocate resources, and to avoid unfair denials.

Question 1: Whether DHS regulations should be revised to permanently lengthen the period of the automatic extension period to up to 540 days for employment authorization and/or EAD validity for eligible renewal applicants?

NIPNLG strongly supports DHS’s suggestion that the rule extending the automatic extension of EADs for 540 days be made permanent, and believes it would be fairer for noncitizens if the time were extended to at least 730 days. There are historic backlogs in multiple categories of USCIS benefits, and it is unfair to noncitizens to be in a frequent state of fear that they will lose their livelihood or be forced to work without authorization which may potentially imperil options to gain more permanent legal status in the future. Revising the DHS regulations to permanently lengthen the period of the automatic extension period would alleviate some of the extreme hardships noncitizen workers face due to USCIS delays in approving I-765 applications. Further, the noncitizens who are authorized to work incident to status pursuant to 8 CFR § 274a.12 workers should not face administrative barriers to their employment.

Allowing noncitizens to work lawfully, and pay taxes, is not only good for the noncitizens themselves, it also benefits the U.S. economy, which has grown over the last two years as a direct result of increased immigration.² Noncitizens in the workforce frequently pay into the Social Security system without being able to access those benefits, thereby providing funds in the system that are critical to its solvency.³ The preamble to the rule itself notes that the EAD extension will stabilize \$29.1 billion in income for approximately 800,000 noncitizens.⁴

² Rachel Siegel, et al, *The Economy Is Roaring. Immigration Is a Key Reason*. THE WASHINGTON POST, Feb. 27, 2024, <https://www.washingtonpost.com/business/2024/02/27/economy-immigration-border-biden/>. (Finding that 50 percent of the labor market’s recent growth came from foreign-born workers between January 2023 and January 2024.)

³ Catherine Rampell, *You Don’t Want Immigrants? Then Tell Grandma She Can Never Retire*. THE WASHINGTON POST, Apr. 23, 2024, <https://www.washingtonpost.com/opinions/2024/04/23/immigration-jobs-economy/>.

⁴ 89 Federal Register 24628, 24629 (Apr. 8, 2024) <https://www.govinfo.gov/content/pkg/FR-2024-04-08/pdf/2024-07345.pdf>.

Not only will expanding the temporary final rule benefit the job market, but it will also help add stability to the millions of hard-working noncitizens who are affected by delays in renewing their work permits. A few examples of the human impact of losing employment authorization are highlighted below. One individual interviewed by CBS News, a political dissident from Nicaragua who worked as a roofer in Miami, had been waiting almost a year for his EAD to be renewed at the time he was interviewed. He feared that when he lost his work authorization, he would also lose his driver's license, which is tied to the permit, because USCIS has not sent him his renewal in time. He said, "It is stressful. You're always worried. Being out of work triggers a chain reaction: there's no income, there's no money for rent, there's no food."⁵

Other noncitizens whose EAD renewals have been delayed have also spoken of the difficulties they face as a result of the backlog and express fear that they will not be able to support their families and may face homelessness and hunger.⁶ One individual interviewed by *Bloomberg* was placed on unpaid leave from her job working at a major health insurance provider while she waited for her EAD renewal to be approved.⁷ Another woman who worked at a bank was also placed on unpaid leave.⁸ She and her husband are trying to purchase a new home, but because she is still waiting for her renewal to be processed, her inability to work could throw the sale into jeopardy; she is not allowed to drive since her EAD expired, forcing her to remain at home.⁹ Others are fired, lose their income, and must spend their own savings, max out credit cards, or borrow money from friends to make ends meet.¹⁰ Making the automatic extension at least 540 days, but preferably 730 days, would prevent individuals requiring work authorization from being put in this difficult position, waiting for their renewals to be processed and unable to work in the increasingly long interim.

According to the preamble to the rule itself, however, due to USCIS processing delays, 260,000 noncitizens are at risk of losing their employment eligibility even with the 540-day auto-extension.¹¹ NIPNLG therefore supports a 730-day extension rather than 540 days. The preamble itself suggests the possibility of a 730-day extension.¹²

In reality, although a 730-day extension is better than a 540-day extension, USCIS could extend EADs for 48 months similar to the conditional lawful permanent resident (LPR) extensions following the submission of Form I-751. Under this 48-month framework, the I-551 extension helps the considerable number of LPRs who would lack a DHS document, which they may need to obtain a REAL ID compliant state ID, or other benefits. Similarly, due to pressure on USCIS resources, the equally meritorious noncitizens authorized to work incident to status should have a 48-month extension on their EADs.

⁵ Camilo Montoya-Galvez, *U.S. Immigration Agency Moves to Cut 9.5 Million-Case Backlog and Speed Up Process*. CBS NEWS, Mar. 29, 2022, <https://www.cbsnews.com/news/immigration-uscis-case-backlog-processing-delays/>.

⁶ *Id.*

⁷ See Dara Lind, *U.S. Work-Permit Backlog is Costing Immigrants Their Jobs*. BLOOMBERG BUSINESSWEEK, Mar. 15, 2022, <https://www.bloomberg.com/news/articles/2022-03-15/u-s-work-permit-backlog-costing-immigrants-their-jobs?sref=iRPGYJiK>.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ 89 Fed. Reg. at 24647.

¹² *Id.*

Question 2: Whether a different permanent extension period should be implemented, for some or all applicants covered by the automatic extension provision on either a temporary or permanent basis?

NIPNLG commends USCIS for extending the validity period of EADs for refugees, asylees, noncitizens granted withholding of removal, asylum applicants, adjustment applicants, and applicants for suspension of deportation or cancellation of removal.¹³ While this is an important move in the right direction, it is only logical and fair that if USCIS is issuing this rule to protect noncitizens from losing their employment, it would issue a rule that would protect all such noncitizens. For example, by its own terms, the rule does not provide the extension to DACA recipients seeking renewal. NIPNLG urges USCIS to provide extensions to EADs for DACA holders as well. Individuals with DACA play a vital role in our economy, holding many frontline medical provider and other key positions.¹⁴ There is no rationale behind extending EADs for some noncitizens and not others, when they have all acted to timely renew their EADs, and the delays are simply the result of agency backlogs due to under-resourcing.

NIPNLG strongly favors a 730-day (two year) extension that would cover all applicants. While the agency considered having some auto-extensions last for 730 days and other for 540 days, it rejected this idea due to the possible confusion it would cause to noncitizens and employers.¹⁵ NIPNLG agrees that having different auto-extension lengths could cause confusion among noncitizens trying to determine how long their EAD is valid and among employers who may not understand the rule if it is too complicated and may therefore terminate noncitizens' employment. This potential for confusion if there are two auto-extension dates, is why NIPNLG supports a single extension length of 730 days, which should cover all noncitizens at risk of losing their ability to work now, rather than just a portion of them, who would have to hope that there may be another rulemaking in the future to allow them to continue to work.

Additionally, NIPNLG recommends that: 1) USCIS issue Forms I-94 and allow the I-94s to be used as evidence of employment authorization for noncitizens who are authorized to work incident to status, and 2) follow the plain language of its regulations and allow noncitizens with TPS to stack their Federal Register Notice (FRN) and 540-day EAD extensions.

For the first issue, although some noncitizens, like TPS holders, are authorized to work incident to status under 8 CFR § 274a.12, as a practical matter, USCIS only allows them to show an EAD to comply with Form I-9 requirements since they are no longer eligible for unrestricted Social Security cards, a change that occurred in the early 2000s. USCIS could alleviate its I-765

¹³ See e.g. United States Citizenship and Immigration Services, *Some EADs Can be Valid for Up to 5 Years*, available at <https://www.uscis.gov/save/whats-new/some-eads-can-be-valid-for-up-to-5-years-0>, November 16, 2023.

¹⁴ American Progress, A Demographic Profile of DACA Recipients on the Frontlines of the Coronavirus Response, (Apr. 6, 2020) <https://www.americanprogress.org/article/demographic-profile-daca-recipients-frontlines-coronavirus-response/#:~:text=For%20example%2C%20while%20CAP%20analysis,food%20preparers%2C%20and%20management%20or.>

¹⁵ *Id.*

backlog, comply with its obligations under INA § 244(a)(1)(B), and help the noncitizen workers, by: 1) routinely issuing I-94s to noncitizens who are authorized to work incident to status, and 2) allowing those noncitizen workers to use their I-94s to prove work authorization under List C#7 on the Lists of Acceptable Documents, even if their I-94 could also be considered a List A receipt. This approach aligns with USCIS’s policy towards asylees, some U visa beneficiaries, T visa beneficiaries, and, following the settlement agreement in *Shergill v. Mayorkas*, L-2 spouses. To the extent USCIS believes it necessary to revise 8 CFR § 274a.12(c) (“[Noncitizens] who must apply for employment authorization”), NIPNLG encourages the agency to do so.

However, USCIS need not wait for a change to those regulations because if a noncitizen worker has submitted an I-765, then the noncitizen worker will have satisfied the regulation and could still use the I-94 as evidence of work authorization (i.e., the regulation requires the noncitizen *apply* for work authorization, but does not require the noncitizen to use the EAD for work authorization at the exclusion of other documentation USCIS permits). Also, to the extent USCIS is concerned that some I-94s (such as for refugees and Afghan and Ukraine parolees) would be considered both List A receipts and List C#7 documents, that is not a conflict. As USCIS is aware, the Native American tribal document is simultaneously both a List B#8 and List C#4 document and this dual purpose has not triggered any issues.¹⁶

In addition to the backlog, issuing I-94s would address the delays caused by USCIS-made errors on the EAD and problems with the mail delivery that lead noncitizen workers to lack an EAD (the extension letter is worthless without an accompanying EAD that matches the information on the EAD). Issuing a Form I-94 to noncitizens who are authorized to work incident to status, *and allowing them to use those I-94s as evidence of work authorization* (e.g., List C# on the Form I-9 Lists of Acceptable documents), would permit more work-authorized noncitizens to prove their authorization. Being able to readily prove work-authorization would reduce the hardship noncitizen workers face when waiting to receive their EAD by allowing them to be self-sufficient and contribute to our economy. Furthermore, it would reduce costs for USCIS by eliminating the need to fix an EAD issued with errors and would reduce the amount of correspondence that USCIS would invariably field from the noncitizen worker seeking a correct EAD.

With respect to the second issue, USCIS should follow the plain language of its regulations by stacking the 540-day extension period to whatever EAD extension has been issued pursuant to Federal Register Notice (FRN), if the TPS beneficiary satisfies the requirements in both. A plain reading of 8 CFR § 274a.13(d)(1) suggests that stacking is the correct result. 8 CFR § 274a.13(d)(1)(i) discusses “the date shown on the face of the EAD” to determine whether the person submitted the I-765 timely. Instead of using this same phrase— “the date shown on the face of the EAD”— to describe the expiration date of an EAD, 8 CFR § 274a.13(d)(1) uses “from the date of such document’s and *such employment authorization’s expiration.*” (emphasis added). Similarly, 8 CFR § 274a.13(d)(3) describes the termination period of EAD authorization as “the earlier of up to 180 days after the *expiration date of the [EAD].*” (emphasis added). The difference in terminology reflects an understanding that the date on the face of the EAD is not an EAD’s expiration because of FRN automatic extensions. When DHS issues a blanket automatic

¹⁶ See United States Citizenship and Immigration Services, *Form I-9 Acceptable Documents* (April 17, 2024), available at: <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents>.

extension of the expiring EADs for TPS beneficiaries of a specific country through an FRN, all the EADs are automatically extended without any required action from the TPS holder. Indeed, the difference in terminology (“date shown on the face of the EAD” vs. “from the date of such document’s...expiration”) confirms that the EAD extension under 8 CFR § 274a.13(d) commences from the EAD expiration date as determined by the FRN extension.

Question 3: Whether other solutions should be considered to mitigate the risk of expiring employment authorization and/or EAD validity for some or all applicants covered by the automatic extension provision?

NIPNLG believes that in general the period of EAD validity should be lengthened. We appreciate that USCIS took this step in November 2023, allowing certain categories of EAD to be valid for five years.¹⁷ The Ready to Stay Report Card recommended this change and we appreciate that the administration was willing to lengthen the period of some initial EADs.¹⁸ Under this change, asylum seekers, asylees, refugees, those with withholding, adjustment applicants, and cancellation applicants may be granted a five-year initial EAD. We urge USCIS to similarly extend EAD validity length of individuals with DACA and those under orders of supervision. Making EAD validity periods longer not only benefits immigrant workers, it also benefits the agency because it expends half the resources in issuing one four-year EAD that it does in issuing one two-year EAD and then having to adjudicate a renewal two years later.

The rule also explains that some noncitizens seek EADs because they are a valid form of identification and may be need for employment even for those whose status allows them to work without an EAD, such as asylees and refugees.¹⁹ NIPNLG suggests that those who have an indefinite status, should be issued an EAD with no expiration date, or, at a minimum, that the EAD should last for ten years, similar to a “green card,” since the status does not expire.

A. USCIS should eliminate the asylum clock and grant c8 EADs 180 days after receipt of the asylum application

NIPNLG believes another solution USCIS should implement is to remove the asylum EAD clock system entirely. As we stated in the Ready to Stay Report Card:

It is unfair to prevent asylum seekers from working legally for reasons such as a postponement to seek counsel, especially when there is a shortage of pro- and low-bono counsel for asylum seekers, or a change in address from one Asylum Office’s jurisdiction to another, especially when asylum seekers are forced to be transient out of economic necessity and yearslong agency delays. In addition to the harm caused to the asylum seeker by the “clock,” this system – in which USCIS officers need to count days, determine the cause of any delay, and troubleshoot the asylum clock when it is wrongly

¹⁷ USCIS, *Some EADs Can Be Valid for Up to 5 Years* (Nov. 16, 2024) <https://www.uscis.gov/save/whats-new/some-eads-can-be-valid-for-up-to-5-years-0>.

¹⁸ See, Ready to Stay Report Card, supra note 1 at 12.

¹⁹ 89 Fed. Reg. at 24630.

stopped or not restarted – is a poor use of limited USCIS resources, which should be expended on adjudicating applications.²⁰

NIPNLG and partners have advocated with USCIS for this solution through a letter describing the origins of the asylum clock and the fact that there is no legal requirement that such a clock exist.²¹ As we explained in that letter:

Time that USCIS and [Executive Office for Immigration Review] EOIR spend trying to keep up with the complex administration of the EAD clock, could be better spent on substantive adjudications. Likewise, advocates must expend substantial resources following up with Asylum Offices and EOIR staff when the clock has been wrongfully stopped or has not been properly restarted. Agency staff must then respond to those inquiries by advocates, further reducing their available time to engage in other backlog reduction tasks. Various immigration advocacy and legal services groups have called on the agencies to do away with the asylum clock. USCIS Director Ur Jaddou has also highlighted the importance of timely adjudications in all types of applications and the need for creative solutions.²²

With historic backlogs, it is important that the agency consider bold steps to allow noncitizens to be able to work and support themselves, and to relieve pressure on the agency caused by the high volume of applications.

Director Jaddou recently stated, “The rule will also provide the agency a window ‘to consider long-term solutions by soliciting public comments, and identifying new strategies to ensure those noncitizens eligible for employment authorization can maintain that benefit.’”²³ Eliminating the asylum clock would simplify adjudications of asylum-pending EADs without having any negative impact on the asylum system.

B. DHS should ensure that all EADs are REAL ID compliant

Although not directly related to the EAD extension issue, we would like to respond to the question calling for general improvements to the EAD process by flagging a problem faced by some EAD holders that appears to be the result of an oversight by Congress. Specifically, the REAL ID Act,²⁴ sets forth specific forms of lawful immigration status that may allow a noncitizen to qualify for a REAL ID-compliant state identification card or driver’s license. The list includes both indefinite immigration statuses such as lawful permanent resident and asylee, and it also includes short-term statuses, including non-immigrant visa. Notably absent from the list, however, is parolee. Given the Biden Administration’s historic expansion of parole both to

²⁰ *Id.*

²¹ NIPNLG, et al, Letter to DHS and DOJ Advocating for the Elimination of the Asylum EAD Clock (Mar. 9, 2023) <https://nipnlg.org/work/resources/letter-dhs-and-doj-advocating-elimination-asylum-ead-clock>.

²² *Id.* at 5.

²³ Andrew Kreighbaum, *Work Permit Relief Coming for 800,000 Immigrants in New Rule (2)*, BLOOMBERG LAW, Apr. 4, 2024, <https://news.bloomberglaw.com/daily-labor-report/immigrants-renewing-work-permits-get-backlog-relief-in-new-rule>.

²⁴ H.R. 1268 section 201, <https://www.dhs.gov/xlibrary/assets/real-id-act-text.pdf>

alleviate humanitarian crises abroad, and as a means of discouraging irregular entries at the border, this omission is especially problematic.²⁵ In fact, there were nearly 500,00 noncitizens granted parole during the first three quarters of fiscal year 2023.²⁶ Because the REAL ID Act passed before parole was used as commonly as it is today, hundreds of thousands of noncitizens are in the United States with lawful status and employment authorization, but are unable to obtain REAL ID compliant identification cards.

Although NIPNLG recognizes that DHS cannot fix a legislative problem through rulemaking, it is important for DHS to know how existing laws may undermine the goals of this proposed rule. Specifically, language in the REAL ID undermines the main reason for issuing longer EAD extensions: to alleviate the difficulties employers face when their valued employees have gaps in their employment authorization, through no fault of the employer or the noncitizen employee. The REAL ID undermines longer EAD extensions because the law makes it difficult, if not impossible, for noncitizens with EAD extensions to get a REAL-ID compliant driver's license. Therefore, EADs that are valid for longer periods of time will be significantly limited in their value if the noncitizen employee cannot drive to work; unfortunately, in many parts of the country public transportation is simply not available. NIPNLG has learned from its members that the REAL ID Act is already impacting vulnerable noncitizen workers in a few ways.

First, under the REAL ID Act those with parole, except for Afghans who are expressly permitted to obtain REAL ID-compliant identification through section 2502(b)(3) of the Afghanistan Supplemental Appropriations Act, cannot obtain any REAL ID-compliant federal identification. For example, Ukrainian nationals and their immediate family members paroled into the U.S. through Uniting for Ukraine are not eligible for a REAL ID-compliant documents because parole is not included in the REAL ID Act as evidence of lawful status.²⁷ Our members report that state motor vehicle administration agencies are indeed not issuing REAL ID-compliant licenses or state identification cards to Ukrainians who have valid parole. It is unclear why Congress omitted parole as a category authorized to receive a REAL ID-compliant identification document while including other temporary statuses such as TPS and deferred action.

Second, noncitizens holding some statuses are having difficulty getting or renewing a REAL ID-compliant identification document because of requirements under 6 C.F.R. § 37.11(g)(2). which state that an EAD, on its own, is insufficient to prove lawful status, and must be coupled with a second type of documentation. For example, refugees and asylees should be eligible for full-term REAL ID-compliant identification, but nevertheless may experience years where they would lack documentation to prove their eligibility for a REAL ID identification document because an EAD is insufficient on its own to obtain a REAL ID and there is lack of clarity as to which other documents are acceptable under 6 C.F.R. § 37.11(c)(x). But, as noted above, issuing Forms I-94

²⁵ DHS, Fact Sheet: Circumvention of Lawful Pathways Final Rule (May 11, 2023) <https://www.dhs.gov/news/2023/05/11/fact-sheet-circumvention-lawful-pathways-final-rule> (describing lawful pathways the administration encourages noncitizens to use rather than the unlawful pathways that are punished under the May 2023 rule.)

²⁶ DHS, Parole Requests FY 2023 Q2 and Q3, at 6 (Dec. 4, 2023) https://www.dhs.gov/sites/default/files/2024-01/2023_1204_dmo_plcy_parole_requests_q2_and_q3.pdf.

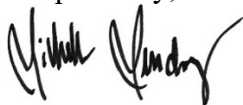
²⁷ <https://www.uscis.gov/humanitarian/uniting-for-ukraine/frequently-asked-questions-about-uniting-for-ukraine> (see the last FAQ on this webpage).

would allow noncitizens to comply with REAL ID requirements by becoming the second type of documentation. However, even if it were clear that a refugee/asylee I-94 was a valid 6 C.F.R. § 37.11(c)(x) document, there are long stretches of time during which refugees and asylees do not have a valid EAD. For example, when a refugee applies for LPR status, the refugee receives an I-797 receipt that reflects a C09 EAD category code. Yet the EAD itself will still have the A03 EAD category code, thus preventing the EAD from receiving an extension because the category codes do not match. The same result applies to an asylee when the person changes from a C08 asylum applicant EAD category to an A03 asylee EAD category, and then again when the asylee applies for adjustment and becomes authorized to work pursuant to C09 EAD category. In these situations, the only documents evidencing status that the refugee or asylee would have are an I-94 and a social security card (for refugees, the Transportation Boarding Letter would have long since expired, and most do not receive I-571 refugee travel documents), but the I-94s and social security cards are insufficient to obtain or renew a REAL ID.

Conclusion

In closing, NIPNLG supports DHS's efforts to provide relief to EAD renewal applicants and U.S. employers by issuing this rule. It is an important step in the direction of fairness for noncitizens. We urge DHS to take bolder measures, including increasing the auto-extension to 730 days, ensuring that other categories of EAD holders can benefit from the auto-extension, and making further regulatory changes to make the EAD system fairer and more efficient. Please do not hesitate to contact Michelle N. Méndez at michelle@nipnlg.org if you have any questions or need any further information. Thank you for your consideration.

Respectfully,



Michelle N. Méndez
Director of Legal Resources and Training
National Immigration Project
1200 18th Street NW Suite 700
Washington DC 20036
(540) 907-1761