



July 15, 2020

Submitted via email to: www.Regulations.gov

RIN no. 1125-AA94

Re: Procedures for Asylum and Withholding of Removal; Credible Fear and Reasonable Fear Review; RIN 1615-AC42 / 1125-AA94 / EOIR Docket No. 18-0002/ A.G. Order No. 4714-2020

Dear EOIR:

I am writing on behalf of Spring Institute for Intercultural Learning to oppose the Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) and Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) Joint Notice of Proposed Rulemaking: *Procedures for Asylum and Withholding of Removal; Credible Fear and Reasonable Fear Review*.

For over 40 years, Spring Institute for Intercultural Learning has been a nationally-recognized provider of effective intercultural learning programs and services. As a nonprofit organization serving the Denver, Colorado metropolitan area and beyond, we support the community needs and cultural integration of over a thousand immigrants and refugees annually. These individuals contribute to the vibrancy of our social fabric while playing an integral role in our economy.

The United States has a long history of welcoming those fleeing persecution and dangerous conditions elsewhere in the world. Asylum protections were set up to safeguard those who are unable or unwilling to return to their home country, and who cannot obtain protection in that country, due to past persecution or a well-founded fear of being persecuted in the future “on account of race, religion, nationality, membership in a particular social group, or political opinion.” At the same time, refugees, including asylees, have historically been the most heavily vetted individuals to arrive on U.S. soil, subjected to in-person interviews, biometric screening, and background checks by multiple agencies in a process taking, on average, over a year. The Trump Administration has already significantly curtailed the number of refugees allowed into the United States. It is unnecessary and inhumane to target asylum seekers with additional restrictions.

Furthermore, this rule would impose arbitrary yet insurmountable bureaucratic barriers at every stage of the asylum process, effectively shutting the door to those fleeing domestic violence and other gender-based harm and rejecting many escaping gang violence and recruitment. The proposed Third Country Transit Ban, which dismisses those who must necessarily transit through at least one other country on their way to the U.S., violates both domestic and international law by failing to ensure that asylum seekers can apply for protection regardless of their nationality, travel route, or place of entry or arrival to the United States. It would also deny asylum seekers their right to a fair hearing and, because it does not address the effect on pending claims, it would leave current asylum seekers in limbo.

The United States must never forget the lessons from World War II and must never repeat the mistakes of turning away those seeking safety and freedom when it remains fully able to open its doors. At Spring Institute, we are privileged to work with asylees and other immigrants who deeply appreciate the opportunities afforded to them in the U.S. and are eager to share their expertise and otherwise enrich the community. It is fundamentally unfair and unpatriotic to turn them away.

Sincerely yours,

Paula Schriefer
President / Chief Executive Officer