



August 7, 2020

Submitted via email to: [www.Regulations.gov](http://www.Regulations.gov)

**Re:** Security Bars and Processing; RIN 1615-AC57 / 1125-AB08 / Docket No: USCIS 2020-0013 / A.G. Order No. 4747-2020

Dear EOIR:

I am writing on behalf of Spring Institute for Intercultural Learning to oppose this proposed rule, which would block asylees from seeking protection in the U.S. under the pretext of pandemic response. The public health community has condemned the administration's repeated and false associations between immigrants and public health risk, making the proposed rule unjustifiable and ill-informed.

For over 40 years, Spring Institute 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 a vital role in our economy, including by serving as essential workers during the COVID-19 pandemic. The proposed rule is patently misguided and fundamentally unfair for multiple reasons, including:

- Under the proposed rule, even if an asylum seeker does not exhibit symptoms of a communicable disease, they could be barred from asylum protection if they hail from or traveled through a country where an outbreak is "prevalent or epidemic." Given the reach of the ongoing COVID-19 pandemic, this provision would be a de facto ban on asylum.
- It would also bar asylum-seeking nurses, doctors, health aides, cleaners, and all other essential personnel who have "come into contact with" COVID-19. As a result, individuals who have risked their lives protecting U.S. communities would be banned from humanitarian protection even if they are fleeing persecution.
- It forces those seeking protection under the Convention against Torture (CAT) to demonstrate at the initial credible fear screening stage that they would more likely than not be tortured in their country of removal. This is an incredibly high standard requiring survivors to raise and provide evidence for their CAT claim from the very first step in the asylum process, ignoring established science on trauma's impacts on memory recall.

The United States must never forget the lessons from World War II nor repeat the egregious error of turning away those seeking safety and freedom when we remain fully able to open our 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 support and enrich the community, even when doing so puts their own health at risk. The Trump Administration has already significantly curtailed the number of refugees allowed into the country. It is fundamentally unfair, unpatriotic and counterproductive to target asylum seekers with further restrictions and particularly shameful to do so in the context of the pandemic by scapegoating the very people who often put themselves on the front lines of lifesaving COVID-19 response.

Sincerely yours,

Paula Schriefer  
President / Chief Executive Officer