



# Freedom Network USA

November 8, 2019

Samantha Deshombres  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

RE: DHS Docket No. USCIS-2018-0001, 84 F.R. 47148

To Whom It May Concern:

Freedom Network USA (FNUSA) respectfully submits this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

FNUSA, established in 2001, is a coalition of 68 non-governmental organizations and individuals that provide services to, and advocate for the rights of, trafficking survivors in the United States. Our members include survivors themselves as well as former prosecutors, civil attorneys, criminal attorneys, immigration attorneys, and social service providers who have assisted thousands of trafficking survivors. Together, our members provide services to over 2,000 trafficking survivors each year.<sup>1</sup>

FNUSA is opposed to the DHS proposal which would delay the issuance of EADs for asylum seekers. FNUSA and our members support survivors from throughout the world who come to the US to seek protection from human trafficking. They have been abused and exploited by family members, neighbors, and government officials. They have been persecuted and suffered retaliation when they have attempted to flee the exploitation. They have been denied their freedom, safety, and income. Access to employment is a key element in their physical and psychological recovery.

Considering DHS' own reports that it is now deciding over 99% of EADs within the 30-day processing timeline, it is clear that DHS is generally able to address fraud and security concerns within the current timeframe and process. Therefore, there is no justification to compounding

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<sup>1</sup> Freedom Network USA 2018 Member Report, available at <https://freedomnetworkusa.org/app/uploads/2018/04/FRN-Member-Report-Digital-FINAL.pdf>.

the severe harm already suffered by trafficking survivors and others seeking protection from the US.

I can be reached at [jean@freedomnetworkusa.org](mailto:jean@freedomnetworkusa.org) if you have any questions or need any further information or explanation.

Sincerely,

A handwritten signature in black ink that reads "Jean Bruggeman". The signature is written in a cursive, flowing style.

Jean Bruggeman  
Executive Director  
Freedom Network USA