



ASYLUM SEEKER ADVOCACY PROJECT

June 7, 2024

Submitted via www.regulations.gov

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: DHS Docket No. USCIS-2024-0002, Comments in Response to Temporary Final Rule Entitled *Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Employment Authorization Document Renewal Applicants*

Dear Chief Nimick:

The Asylum Seeker Advocacy Project ("ASAP") respectfully submits the following comment to the temporary final rule, *Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Employment Authorization Document Renewal Applicants*, 89 Fed. Reg. 24,628 (Apr. 8, 2024) (DHS Docket No. USCIS-2024-0002; CIS No. 2767-24) ("the TFR" or "the Rule").

I. Summary of the Argument

ASAP applauds DHS for issuing the TFR. The Rule will prevent hundreds of thousands of unnecessary and harmful lapses in work authorization caused by delays in renewing asylum seekers' employment authorization documents ("EADs" or "work permits"). Through the TFR, DHS has offered meaningful stability and protection to many asylum seekers and other immigrant workers, as well as their employers, their communities, and the U.S. economy.

Although the TFR is an important first step, ASAP urges DHS to take additional steps, as the Rule does not fully address the severe harms that flow from delays in adjudicating work permit renewals. By DHS's own estimate, over 260,000 individuals

(including over 155,000 asylum seekers) will experience unnecessary gaps in their work authorization, even with the TFR, unless the agency makes additional changes. See 89 Fed. Reg. at 24,647, 24,659. Additionally, as explained below, the TFR will only have the impact DHS intends if employers and state Departments of Motor Vehicles (DMVs) understand and adhere to the TFR's 540-day auto-extension.

ASAP respectfully recommends DHS implement the following changes to mitigate harm to applicants:

- (1) DHS should make the TFR permanent;
- (2) DHS should lengthen the auto-extension period to 730 days; and
- (3) USCIS should prioritize work permit processing backlogs, take additional steps to alleviate confusion around the TFR amongst employers and DMVs, and expand the number of immigrants covered by the TFR.

Additionally, ASAP lays out reasons why DHS should make it easier for asylum seekers and other immigrants to comment directly on rule changes, including by accepting comments in languages other than English, beginning with accepting comments in Spanish.

II. ASAP's Interest in the Proposed Rule

The Asylum Seeker Advocacy Project ("ASAP") believes that asylum seekers can make great change by standing together. ASAP has over 640,000 members – asylum seekers from 175 countries – living in all 50 states and U.S. territories. ASAP provides members with legal and community support.

By creating self-help resources and answering legal questions, ASAP staff members have helped hundreds of thousands of asylum seekers apply for work permits, renew their existing work permits, and seek fee waivers and immigration relief. As the largest membership organization of asylum seekers in the United States, ASAP is uniquely positioned to offer insight about the TFR based on member feedback. ASAP members (and ASAP as an organization) have a strong interest in preventing unnecessary lapses in work authorization and documentation, including via the TFR and other much-needed reforms. Moreover, many ASAP members are essential workers and work in a range of industries like medicine and truck driving, which continue to face labor shortages.

ASAP members' suggestions, comments, and feedback are summarized in the arguments that follow. Overall, ASAP members expressed concern about work permit processing delays and recommended changes to the TFR to improve access to employment authorization. Below are comments we found representative of ASAP members' feedback on the TFR.

"Oh my god, this is amazing news! I am so happy for myself and all the people in this situation."

– ASAP member from Turkey

"I feel [insecure] because at any moment something could happen, but if my work permit could be permanent, it would reassure me and make me feel safe."

– ASAP member from Haiti

"The delays on work permit renders a lot of famil[ies] homeless because the sustainability of families depends on it. Parents have to work in other to take care of their families. If the government can make the 540 days permanent it will be great"

– ASAP member from Cameroon

"It is so stressful . . . especially when you are thinking of changing a job[.] [T]here is that point you have to prove [to] the employer that [you] can legally work[.] I think it would be better for the government to make . . . longer extensions more than 540 days or they should let someone work until a new work permit is renewed as long as they send in the[ir] renewed work papers on time. Thanks!"

– ASAP member from Uganda

"Make the previous work permit valid until a decision on the renewal application has been made"

– ASAP member from Bangladesh

“The government should make the longer work permit permanent until their asylum is decided by the government. This is good relief for both the asylum seekers and the government.”

– ASAP member from Ethiopia

“Notification of extension letters should be sent to individuals so that we have evidence to show our employers.”

– ASAP member from Nigeria

“It’s important for [the purposes of] updating [our] [d]river[’s] [l]icense and showing [it to our] employer. Also it causes stress. They should send us [] written proof with [the] extension date.”

– ASAP member from China

“I think that extending the validity date of work permits would provide more peace of mind and time for renewals to be carried out.”

Originally: “[C]reo que ampliar la fecha de vigencia de los permisos de trabajo brindaria mas tranquilidad y plazo para que pueda realizar las renovaciones”

– ASAP member from Venezuela (translated from Spanish)

To read more comments directly from ASAP members, please read the last section of this comment, in which ASAP includes comments on this rule from 165 ASAP members.

III. The TFR Will Bring Relief to Hundreds of Thousands of Asylum Seekers

This TFR has been great news for asylum seekers, as it will ensure asylum seekers and other immigrants do not fall out of the workforce. ASAP members responded with enthusiasm to the TFR, agreeing that the 540-day work permit extension is urgently needed.

Asylum seekers applying for work permit renewals constitute the vast majority of individuals currently impacted by USCIS’s work permit processing delays. By DHS’s own estimates, asylum seekers account for about 80% of the approximately 800,000 work

permit renewal applicants who would risk imminent lapses in their work authorization without the benefit of the TFR. See 89 Fed. Reg. at 24,634. Moreover, “[c]ontinuous employment authorization during the pendency of an asylum application is vital for asylum seekers in the United States, given their particularly vulnerable position.” *Id.* at 24,653.

As the TFR explains, loss of work authorization poses unique harms to asylum seekers, who are “often” in “precarious economic situations . . . as a result of fleeing persecution in their home countries.” *Id.* at 24,644. And “[t]he situation for asylum applicants is especially dire because of the significant time that [they] must wait to become employment-authorized in the first place” after applying for asylum. *Id.* Asylum seekers need work permits “to access housing, food, and other necessities,” as well as “medical care” and “mental health services” relating to the harms they have survived, and “legal counsel in order to pursue their claims.” *Id.* at 24,645.

Furthermore, work permits serve vital purposes beyond work authorization. For many asylum seekers and other immigrants, a work permit is the only government-issued photo identification available. This means that work permits are critical for asylum seekers and other immigrants to apply for driver’s licenses, secure apartment leases, access banking, obtain basic utilities, enroll in healthcare coverage or school, and obtain other necessities.

For all these reasons, ASAP applauds DHS’s decision to acknowledge and prevent the “significant adverse consequences for applicants, their families, and their employers” that would have materialized if not for the TFR. 89 Fed. Reg. at 24,645.

IV. Response to DHS Question #1: Permanently Lengthen the Work Permit Extension

DHS asked the public: “[w]hether DHS regulations should be revised to permanently lengthen the period of the automatic extension to up to 540 days for employment authorization and/or EAD validity for eligible renewal applicants.” 89 Fed. Reg. at 24,628. In response, **ASAP recommends that DHS permanently lengthen the work permit extension period.**

ASAP members have reported that a permanent automatic 540-day work permit extension will provide increased security and alleviate significant anxiety about USCIS’s backlog and processing delays. Both this comment and other ASAP member comments

included below encourage DHS to make the work permit extension permanent. Additionally, though the TFR issued a temporary work permit extension of 540 days, ASAP members would also welcome a permanent 730-day work permit extension. See *infra* Section V.

There are several reasons why DHS should take permanent action on lengthening the work permit extension period.

First, a permanent rule will prevent unnecessary lapses in work authorization and identification that could occur after the current TFR expires. See 89 Fed. Reg. at 24,674. There is no guarantee that the work permit backlogs will be addressed by the time the TFR expires, and there is always the possibility of unforeseen circumstances causing further backlogs. As a result, DHS should issue a permanent rule now, and take action to shorten the work permit extension period once USCIS has eliminated the work permit renewal backlog. At that time, the agency can promulgate a new rule to return to 180-day automatic extensions or any other period warranted by the circumstances. Such an approach would avoid the hardship and uncertainty that would be caused if the TFR sunsets before the agency has fully addressed the work permit renewal backlog crisis.

Second, a permanent rule would potentially save DHS time. DHS has now had to expend resources twice by issuing two temporary final rules providing 540-day extensions. As ASAP and ASAP members warned in 2022, “[i]f USCIS has not addressed the work permit renewal crisis by October of 2023, another TFR will be needed to ensure that hundreds of thousands of immigrants do not once again fall out of the workforce.”¹ A permanent rule would allow DHS to allocate its limited resources to other priorities, including strategies to tackle the backlog itself.

Third, as ASAP members explain in their comments, a longer work permit extension being permanent “would provide long-term predictability for applicants,” their families, and their employers. *Id.* Applicants and their families will not feel pressured to apply for early or premature work permit renewals to benefit from the longer work permit extension period.

¹ See 87 Fed. Reg. 26,614 (May 4, 2022) (“2022 temporary final rule”); Asylum Seeker Advocacy Project, Comments in Response to Temporary Final Rule Entitled *Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Renewal Applicants* at 12- 13 (July 1, 2022), <https://www.regulations.gov/comment/USCIS-2022-0002-0143> (“2022 ASAP TFR comment”).

Fourth, employers will benefit from a permanent work permit extension, as it will mean less likelihood of employees losing work authorization in the coming years. This long-term increased work permit extension will create greater predictability of business operations and staffing.

Fifth, unforeseen developments may complicate DHS's ability to issue a third temporary final rule if conditions require it. For instance, DHS's policy priorities may shift away from mitigating the harms caused by lapses in employment authorizations due to processing delays and operational challenges. A permanent 540-day (or longer) extension would make it significantly less likely that asylum seekers and other immigrants lose their work authorization in the coming years due to a work permit processing backlog crisis.

V. Response to DHS Question #2: Issue a Longer Work Permit Extension

DHS's second specific question for comment is "[w]hether 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." 89 Fed. Reg. at 24,628. **ASAP strongly recommends that DHS issue a work permit extension of at least 730 days** and begin to contemplate implementing an automatic renewal process.

ASAP members expressed great concern that the TFR clearly states that the 540-day work permit extension is not long enough to prevent immigrant workers from losing work authorization due to work permit processing backlogs. Although the 540-day work permit extension is an important step, ASAP respectfully urges DHS to take further action to prevent unnecessary lapses in the work authorization of asylum seekers and other immigrants stuck in work permit processing backlogs.

A. Lengthen the Work Permit Extension to 730 days

The 540-day work permit extension is simply not long enough to ensure that asylum seekers and other immigrants will not be forced out of the workforce due to processing delays. USCIS projects that because of spikes in processing times expected in August 2024, 260,327 individuals (including 155,730 asylum seekers in work permit category (c)(8)) could experience gaps in work authorization even with the benefit of the TFR. See *id.* at 24,659, Table 6B. In contrast, as the agency acknowledges, "a large part of" this population would experience no gaps in work authorization under a 730-day auto-extension. *Id.* at 24,647.

ASAP recommends that DHS implement a work permit extension period that is at least 730 days (if not longer) for asylum seekers and immigrants whose work permit renewal applications are pending. A 730-day auto-extension would protect many of the 260,327 individuals who are currently projected to lose work authorization beginning in November of 2025 despite the TFR. See 89 Fed. Reg. at 26,647, 59. Implementing a longer auto-extension benefits these applicants and their families, as well as the many stakeholders who depend on them, including employers and local communities.

The TFR provides a few justifications for declining to implement a 730-day extension, including: (1) DHS's decision to prioritize the near-term needs of applicants, their families and employers; (2) DHS's concerns about confusion among employers; (3) public familiarity with the normal 180-day extension or the 2022 temporary final rule's 540-day extension; (4) uncertainties in data projections; and (5) the agency's view that an extension of 540 days better supports its legal claim of "good cause" to forego notice-and-comment rulemaking. See *id.* at 24,647-48. However, none of these stated reasons are compelling given that the alternative is the threat of over 260,000 immigrants falling out of the workforce beginning in 2025.

Addressing only the near-term needs. DHS stated it has prioritized the near-term needs of applicants. But issuing a 730-day work permit extension would provide near-term relief, while also ensuring that immigrants do not fall out of the workforce in 2025 if DHS takes no further action. Engaging in solving problems that are projected to become a crisis within 2 years is not long-term planning. Furthermore, ASAP members who believe they could be among the 260,000+ immigrants to fall out of the workforce due to backlogs are already worried – as are their employers. Acting now to issue a 730-day work permit extension would ameliorate that stress and uncertainty, which is in and of itself an immediate, near-term need.

Risk of confusion. DHS hopes to minimize the risk that employers may be confused. This is a laudable goal. However, it is important to remember that employers and immigrant workers have dealt with significantly more confusing work authorization instructions, including having to check the ever-changing date on the federal register for individuals with Temporary Protected Status (TPS) related to the preliminary injunction order of the U.S. District Court for the Northern District of California in *Ramos, et al. v. Nielsen, et al.*, No. 18-cv-01554 (N.D. Cal. October 3, 2018). This example is evidence that employers and immigrant workers can handle changes to work authorization validity dates. It is also clear that employers and immigrant workers are motivated to learn more about work permit extensions, as they are the primary beneficiaries.

To mitigate any potential confusion, DHS could adopt a 730-day extension for all immigrants subject to both the temporary work permit extension issued in 2022 as well as this TFR. This would ensure that all immigrants subject to work permit extensions have a 730-day extension. Additionally, the agency could minimize employer confusion by improving and updating its helpful Employment Authorization Document Automatic Extension Calculator (the “Calculator”) to provide employers with a definitive answer as to the expiration date of a work permit,² creating a short frequently asked questions (“FAQ”) document for employers, providing applicants with receipt notices that accurately reflect work permit extension lengths, and taking additional, reasonable steps discussed below to educate employers. See *infra* Section VI.

But the possibility of employers losing their immigrant workforce would be the most confusing and stressful outcome for employers. As a result, any potential confusion will be outweighed by the benefits; applicants and employers will welcome the opportunity to work and employ with increased certainty and stability.

Familiarity. DHS also notes that employers, applicants, and the public are now familiar with the ordinary 180-day extension and the 2022 temporary final rule’s 540-day auto-extension. But that familiarity took time. And if anything, the 2022 rule has increased awareness that the agency has the authority to adjust automatic extension periods when necessary. When the 2022 rule was published, employers, applicants, and the public were only familiar with the 180-day extension under the previous rules. Thanks to USCIS’s public-facing resources, stakeholders could understand that the 180-day extension had been converted to a 540-day extension. Similarly, if USCIS provides additional guidance, as discussed below, it need not be difficult for applicants, employers, or the public to understand a 730-day work permit extension. See *infra* Section VI.

Uncertainties. The TFR also opines that the uncertainty of USCIS’s data projections and the possibility of future policy and operational changes counsel in favor of focusing solely on imminent needs. But, in fact, these uncertainties weigh in favor of a longer extension that better accounts for the possibility that work permit processing delays increase in the future. Furthermore, there is no harm in having a 730-day work

² See USCIS, Employment Authorization Document (EAD) Automatic Extension Calculator, <https://www.uscis.gov/i-9-central/form-i-9-resources/employment-authorization-document-ead-automatic-extension-calculator>.

permit extension put into place even if USCIS can process more work permit renewal applications faster than previously projected.

A 730-day or longer auto-extension will avert potential harms to over 260,000 immigrants, their families, employers, and communities. Moreover, many of these applicants are asylum seekers who already experience high levels of uncertainty caused by financial hardship, processing delays in their underlying immigration applications, and the possibility that shifting policy priorities will endanger their ability to work as their expiration dates grow near. Instead of taking a wait-and-see approach that exacerbates this uncertainty, USCIS should act now to provide these applicants with confidence that they will not face lapses in their work authorization.

“Good cause” exception. Finally, ASAP respectfully disagrees with any suggestion that a 540-day extension falls more squarely within the “good cause” rulemaking exception than a longer auto-extension. See 89 Fed. Reg. at 24,654. To be sure, the “limited duration and scope” of a temporary final rule is relevant in determining whether it falls within the good cause exceptions in 5 U.S.C. § 553. But just like this TFR, a 730-day auto-extension would be a limited measure, it would not “make[] additional categories [of workers] eligible for the automatic extension,” and it would be limited to applicants “who are currently in the United States and authorized to work” and “merely seeking renewal of their employment authorization and/or EADs.” 89 Fed. Reg. at 24,653-54. In addition, a 730-day auto extension would still be appropriately tailored to “address the potential lapses that are imminent”—specifically, the lapses that are projected to occur as soon as next fall. See *id.* at 24,654. Moreover, any delay in agency action is impracticable, and “the grave situation that these third parties face is not the result of their own actions and is beyond their control.” *Id.* at 24,651; see also *Nat’l Fed’n Emps v. Divine*, 671 F.2d 607 (D.C. Cir. 1982).

In sum, ASAP asserts that a 730-day work permit extension is the single most critical change DHS should take, including if the agency needs to prioritize this solution over others. See *supra* Section IV. As we laid out above, a system under which applicants receive 730-day work permit extensions is within DHS’s authority (including under the “good cause” exception) and will result in significant benefits to applicants, employers, and the public, while freeing USCIS from significant operational pressures.

B. Explore an Automatic Renewal Process for Asylum Seekers

DHS should begin to explore the possibility of implementing an automatic work permit re-extension or renewal process for asylum seekers with pending asylum cases. Specifically, ASAP recommends that after issuing a 730-day work permit extension, DHS begin to explore automatically renewing asylum seekers' work permits if their asylum cases are still pending at the time their work permits are set to expire. Alternatively, DHS could also explore automatically re-extending asylum seekers' work permits if their renewal applications are still pending. USCIS has the authority to renew or extend work permits for any interval it chooses.³ And there are compelling reasons for the agency to exercise that authority.

First, an automatic renewal process would dramatically relieve pressure on USCIS to process work permit applications. As DHS explains in the TFR, in 2023, it had to reassign officers, hire new staff, and spend more time on work permit applications to comply with court deadlines and keep up with an increase in applications. See 89 Fed. Reg. at 24,635-36. Despite these efforts, USCIS has been unable to reduce processing times and "avoid imminent and near-term lapses." *Id.* at 24,636. By implementing an automatic re-extension process, DHS could relieve much of the burden of having to timely process applications facing a risk of lapse. And by going further—that is, by implementing an automatic work permit renewal process for asylum seekers whose asylum applications remain pending—DHS could eliminate the need to adjudicate hundreds of thousands of Form I-765 renewal applications each year. This, in turn, would help address "the repeatedly mentioned pain point and most known bottleneck of the agency—EAD processing."⁴

Second, USCIS would not necessarily have to lose out on fee collection of work permit renewal applications if the agency instituted an auto-renewal process for work permit applications. Instead, the agency could consider an automatic work permit

³ See 8 C.F.R. § 208.7(b) ("Employment authorization shall be renewable, in increments to be determined by USCIS, for the continuous period of time necessary for the asylum officer or immigration judge to decide the asylum application and, if necessary, for completion of any administrative or judicial review."); 8 C.F.R. § 274a.12(c) ("USCIS, in its discretion, may establish a specific validity period for an employment authorization document, which may include any period when an administrative appeal or judicial review of an application or petition is pending.").

⁴ USCIS Ombudsman, Annual Report 2023 at 19 (June 30, 2023), https://www.dhs.gov/sites/default/files/2023-07/2023%20Annual%20Report%20to%20Congress_0.pdf.

renewal process that permits fee collection but does not require a new application be submitted.

Third, an auto-renewal process would pose little risk that ineligible asylum seekers would be granted renewal work permits. USCIS's overall approval rate for work permit renewals in fiscal year 2020 through 2021 was 92.7%. See 87 Fed. Reg. at 26,641. For asylum seekers, the figure was even higher—96.8%⁵—and as explained in the next section, many of the remaining 3.2% of applications were rejected due to USCIS error or minor, technical applicant errors.

VI. Response to DHS Question #3: Implement Additional Solutions to Mitigate Work Permits Expiring

DHS's third specific question for comment is "[w]hether 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." 89 Fed. Reg. at 24,628. ASAP has laid out suggestions on how the agency can: (A) prioritize addressing the work permit backlog; (B) take additional steps to prevent confusion over the longer work permit extension; and (C) expand the work permit extension to cover a greater number of immigrants.

USCIS should implement solutions to ensure that asylum seekers and other immigrants do not fall out of the workforce. First, USCIS should implement several operational and policy changes that address the work permit processing backlog, including: increasing staffing for work permit renewal processing; expanding e-filing; streamlining Form I-765; and updating data-tracking systems. Second, ASAP recommends that USCIS prevent employer and DMV confusion about the TFR by: reissuing receipt notices; explain the 540-day extension to employers, amending Form I-9; conducting public engagements with additional stakeholders, simplify and improve USCIS existing resources, update USCIS Calculator and website, and do more outreach to state DMVs. Lastly, USCIS should broaden the TFR to include applicants whose renewal applications were received by the agency after the expiration dates on their work permits.

⁵ See USCIS, Form I-765, Application for Employment Authorization, Eligibility Category and Filing Type FY 2003 through 2021, https://www.uscis.gov/sites/default/files/document/data/I-765_Application_for_Employment_FY03-21.pdf.

A. Prioritize Addressing Work Permit Backlogs

USCIS must continue to speed up processing of work permit applications, including renewal applications, and resolve delays that have plagued the agency in recent years. More broadly, ASAP urges USCIS to prioritize processing all renewal applications before the expiration of the applicant's auto-renewal period. To address the work permit backlogs, ASAP members recommend four changes in particular: (1) increasing staffing for work permit renewal processing, (2) expand e-filing, (3) streamline Form I-765, (4) updating USCIS's tracking system.

1. Increasing Staffing for Work Permit Renewal Processing

First, USCIS should prioritize increasing the number of staff working on eliminating the work permit backlog (including for renewals). USCIS can implement this solution immediately by using the cost savings from the other recommendations in this section, as well as the \$34,374,000 that Congress recently appropriated for the purpose of reducing work permit processing backlogs.⁶

Due to timing, the TFR does not take into account the \$34,374,000 in funding appropriated by Congress earlier this year. As a result, we ask DHS to lay out the agency's plans for operationalizing these funds now, in response to comments. Given the volume of the backlog and the risk that over 260,000 immigrants will needlessly lapse out of work authorization, see 89 Fed. Reg. at 24,647, USCIS should use these funds to do everything possible to alleviate work permit processing delays – and process as many work permits as possible.⁷

ASAP recommends that USCIS use creative solutions to spend the \$34,374,000 and get work permit processing under control. We understand that it may be difficult to hire adjudicators given both labor shortages in the U.S. and the lack of guarantee of long-term funding from Congress for work permit processing. As such, ASAP recommends that USCIS authorize overtime; hire contractors to take away some preparation and administrative tasks from government officials; appeal to USCIS retirees to return part-time to the agency to adjudicate work permits; and seek out the

⁶ See Bill Summary, Division C—Department of Homeland Security Appropriations Act, 2024 at 45, <https://docs.house.gov/billsthisweek/20240318/Division%20C%20Homeland.pdf>.

⁷ See 89 Fed. Reg. at 24,643 (noting that allowing e-filing of work permit applications generated “cost savings” that “allowed resources to be used elsewhere, including funding new positions and overtime”).

assignment of detailees from other government agencies, offering reimbursements to other agencies for reassigning their staff to work permit processing.

USCIS has proven that when it prioritizes reducing backlogs, it can achieve remarkable results—as it did during fiscal year 2023, when it processed 10 million naturalization cases, nearly halving naturalization processing times, and effectively eliminating the backlog of naturalization applications.⁸ ASAP recommends that USCIS make eliminating the longstanding work permit backlog (including the backlog of renewal applications) its number one priority for the remainder of calendar year 2024.

2. Expand E-Filing

USCIS should expand e-filing by making it possible for asylum seekers and other immigrants to e-file fee waiver requests; and thus, in turn, e-file their accompanying work permit applications. Further, USCIS should allow e-filing of all categories of work permit applications, not just a select few. Enabling asylum seekers to e-file work permit applications “reduc[ed] the operational costs associated with paper applications such as scanning, manual data entry, and shredding,” “allow[ing] resources to be used elsewhere” and “increas[ing] operational efficiencies for USCIS.” 89 Fed. Reg. at 24,643. USCIS should increase efficiencies again by expanding e-filing to include fee waiver requests, which would ensure more immigrants file work permit applications online as well.⁹ As such, getting the fee waiver application online for e-filing should be a priority associated with reducing the work permit backlog. The current system effectively limits e-filing to individuals who are able to pay the filing fee, which prioritizes renewal applicants with more resources over those who already face economic hardship (and, on top of that, now risk losing their work authorization).

3. Streamlining the Form I-765

ASAP members have repeatedly urged the government to resume accepting the 2017 version of the Form I-765, which is two pages long instead of seven pages.¹⁰ Some

⁸ See USCIS, *Completing an Unprecedented 10 Million Immigration Cases in Fiscal Year 2023, USCIS Reduced Its Backlog for the First Time in Over a Decade* (Feb. 9, 2024), <https://www.uscis.gov/EOY2023>.

⁹ See Asylum Seeker Advocacy Project, Comments in Response to Notice of Extension, Without Change, of a Currently Approved Collection: Request for Fee Waiver 2-4 (Jan. 8, 2024), <https://www.regulations.gov/comment/USCIS-2010-0008-1276> (“2024 ASAP Fee Waiver comment”).

¹⁰ See 2022 ASAP TFR comment, *supra* note 1, at 11, 14; Asylum Seeker Advocacy Project, Comments in Response to Notice of Extension of a Currently Approved Information Collection Activity: Application for

of the questions on the current Form I-765 are not necessary for USCIS to adjudicate work permit eligibility. Indeed, the form was initially lengthened in part to implement harmful regulatory barriers to work permits that USCIS has since rescinded. A longer and more complex form causes confusion, increases the possibility of mistakes, and leads to delays in submitting applications. From the agency's perspective, too, receiving and reviewing lengthier forms takes more time and increases the likelihood of mistakes, exacerbating adjudication and processing delays. Reverting to the shorter Form I-765 will mitigate those delays, including for renewal applications.

4. Updating USCIS's Data Tracking System

USCIS should also begin updating its internal systems so it can track work permit expiration dates and prioritize adjudicating renewal applications for individuals whose work permits are about to expire. According to the TFR, "there is currently no system-based way to assign work based on expiring employment authorization." 89 Fed. Reg. at 24,643. But even if it would take one year to make this possible, see *id.*, if the agency begins these updates now, they will have a system up and running before the longer work permit extension begins to lapse next fall, see *id.* at 24,661. A prioritization tracking system would not only benefit individuals who are covered by the TFR, but it would also benefit the hundreds of thousands of people not covered, such as recipients of the Deferred Action for Childhood Arrivals (DACA) or people who apply for a work permit renewal after their work permit has expired.

The TFR suggests that such prioritization "could incentivize more applicants to file their renewal EAD applications close to the expiration of their EADs," *id.* at 24,643, but this concern is overblown. As ASAP members' comments illustrate, asylum seekers, like all work permit applicants, need authorization to work and are motivated to have valid EADs.

B. Preventing Confusion Among Employers and DMVs

The TFR's 540-day auto-extension will prevent approximately 800,000 renewal applicants and their communities from experiencing severe harm through no fault of their own—but only if employers and state DMVs understand it. DHS has expressed concern that some employers and DMVs may be confused about precisely when an individual's

Employment Authorization 3 (Jun. 6, 2022), <https://www.regulations.gov/comment/USCIS-2005-0035-0191>.

work permit expires. ASAP respectfully urges the agency to take several straightforward steps to ensure that the TFR's promise is realized in the real world, not just in theory.

Specifically, ASAP recommends USCIS implement the following solutions to prevent employer confusion: (1) reissue receipt notices, (2) explain the 540-day extension to employers, (3) amend Form I-9, (4) conduct public engagements with additional stakeholders, (5) simplify and improve USCIS resources about the work permit extension, (6) update the USCIS Calculator and USCIS website, and (7) do more outreach to state DMVs.

1. Reissue Receipt Notices

First and foremost, USCIS should reissue Form I-797C receipt notices to all applicants eligible for the 540-day auto-extension, but who received a Form I-797C receipt reflecting a 180-day auto-extension. This will avoid any confusion caused by having a Form I-797C with inaccurate or outdated information.

After the 2022 temporary final rule was promulgated, many ASAP members faced challenges in accessing the 540-day extension because they had not received clear receipt notices stating that there was a 540-day extension in place. Under the new TFR, the automatic 540-day extension is available to eligible renewal applicants who timely filed on or after October 27, 2023, and whose applications were still pending as of April 8, 2024.

Since the TFR was issued in April of 2024, ASAP staff have received many questions from ASAP members asking what to do if their employers or the DMV do not believe they received the 540-day extension because their receipt notice states they are subject to a 180-day work permit extension. As such, there is still much work the agency should be doing to eliminate confusion.

Alternatively, USCIS should allow individuals to request replacement receipt notices if their employer or DMV is confused.¹¹ The agency can modify the Non-Delivery of Notice e-Request form¹² for this purpose. But to do so, USCIS cannot require noncitizens to assert that their receipt notice was never delivered. Instead, because

¹¹ See 2022 ASAP TFR comment, *supra* note 1, at 9.

¹² USCIS, Non-Delivery of Notice, <https://egov.uscis.gov/e-request/displayNDNForm.do;jsessionid=BD3108482FB346818CF67204994CACAD?sroPageType=ndn&entryPoint=init> (last accessed May 1, 2024).

immigrants may need an accurate receipt notice to use the automatic extension, the agency should allow applicants to request a new receipt notice if the original incorrectly states that the automatic work permit extension is only for 180 days. If USCIS does not want to use the e-Request form for this purpose, it could establish a dedicated email inbox that renewal applicants could use to request a new receipt notice that properly reflects the 540-day automatic extension. DHS has used dedicated email inboxes to address prior discrete issues. Here, such an inbox could streamline the process of responding to requests and maximize DHS's responsiveness.

2. Explain 540-Day Extension to Employers

USCIS should do outreach to employers and clarify that refusing to honor the 540-day extension may violate the law, which prohibits unlawful employment discrimination on the basis of immigration status.¹³ The TFR acknowledges the related danger that "some employers, notwithstanding possible violation of" federal law, "may be hesitant to hire asylum seekers . . . if it appears maintaining their employment will be difficult due to potential lapses in employment authorization." 89 Fed. Reg. at 24,644-45. USCIS should add such warnings to, at minimum, its "I-9 Central" webpage on Employment Authorization Extensions;¹⁴ its "Information for employers and Employees" webpage about this TFR and the 2022 rule;¹⁵ sections 5.0 through 5.3 of its Handbook for Employers M-274;¹⁶ and its main webpage for Form I-765.¹⁷

3. Amend Form I-9

USCIS should amend Form I-9, Employment Eligibility Verification, and the Form I-9 instructions so that they explicitly account for the 540-day auto-extension.¹⁸ Currently,

¹³ See 8 U.S.C. § 1324b(a); 28 C.F.R. § 44.200; U.S. Dep't of Justice, Civil Rights Division, Immigrant and Employee Rights Section, <https://www.justice.gov/crt/immigrant-and-employee-rights-section>.

¹⁴ USCIS, Employment Authorization Extensions (last updated Nov. 3, 2023), <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents/employment-authorization-extensions>.

¹⁵ USCIS, Automatic Employment Authorization Document (EAD) Extension (last updated Apr. 4, 2024), <https://www.uscis.gov/eadautoextend>.

¹⁶ USCIS, Handbook for Employers M-274, 5.0 Automatic Extensions of Employment Authorization and/or Employment Authorization Documents (EADs) in Certain Circumstances (last updated Apr. 8, 2024), <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274/50-automatic-extensions-of-employment-authorization-andor-employment-authorization-documents-eads-in>.

¹⁷ USCIS, I-765, Application for Employment Authorization (last updated Apr. 4, 2024), <https://www.uscis.gov/i-765>.

¹⁸ See USCIS, I-9, Employment Eligibility Verification (last updated Apr. 3, 2024), <https://www.uscis.gov/i-9>.

Form I-9 includes several statements that may be confusing for employers considering the TFR. For instance, Form I-9's list of "Acceptable Receipts" that employers may use to verify an employee's work authorization does not currently include the "Notice of Action (Form I-197C)" or "receipt notice." Form I-9 also states that "[a]ll documents containing an expiration date must be unexpired," without any explanation concerning the TFR's auto-extension.

To prevent employer confusion, USCIS should: (1) add the "Notice of Action (Form I-797C)" or "receipt notice" to the list of "Acceptable Receipts;" (2) add a paragraph to the form instructions explaining to employers that an EAD (Form I-766) that is expired on its face is automatically extended for 540 days, and therefore considered "unexpired," when combined with a Notice of Action (Form I-797C) demonstrating that the applicant properly filed a qualifying application to renew their work permit; and (3) in the Form I-9, state "See Instructions for definition of 'unexpired'" immediately underneath the statement "All documents must be unexpired." ¹⁹

4. Conduct Public Engagements with Additional Stakeholders

USCIS should conduct additional public engagements concerning the 540-day automatic extension. For instance, the agency should engage directly with associations of human resources staff, as well as professional employment organizations (PEOs). Additionally, USCIS should post about the automatic extension on social media and create fact sheets, FAQs, and other materials providing a plain-language explanation of the automatic extension process. USCIS should write these materials so that any employer can understand them without the assistance of a lawyer. For example, the agency should explain clearly that even if an EAD appears to be expired on its face, the auto-extension period may apply.

5. Simplify and Improve Upon USCIS Existing Resources

USCIS should simplify and improve upon its existing resources for employers to further minimize confusion, including the Handbook, the Calculator, and website information. In particular, USCIS should update sections 5.0 through 5.3 of its Handbook for Employers to state, more straightforwardly than they do now, that even if a receipt

¹⁹ For more details on these recommendations, including suggested language for the revised Form I-9 instructions, see Asylum Seeker Advocacy Project, Comments in Response to Notice of Revision of a Currently Approved Information Collection Activity: Employment Eligibility Verification 5-6 (May 31, 2022), <https://www.regulations.gov/comment/USCIS-2006-0068-0611>.

notice lists an extension of 180 days, an applicant is eligible for an extension of 540 days due to regulatory action, except in certain limited circumstances.²⁰ USCIS should also include a section of the Handbook warning employers that failure to honor the 540-day extension may constitute unlawful employment discrimination on the basis of immigration status. It is difficult to find this information on the I-9 Central website, and employers will likely want reassurance that a 540-day extension is authorized.

6. Update USCIS Calculator and USCIS website

In addition, USCIS should update its Calculator to provide employers with a one-stop, definitive answer as to the expiration date of a work permit. The current Calculator requires an employer to first read a full page of complicated information and decide whether an employee is even eligible for the automatic extension. To reduce the risk of employer mistakes or confusion, a revised Calculator should enable an employer to select or enter all the relevant information (including the EAD category) from an employee's EAD and receipt notice. In addition, the Calculator should include photos and diagrams to show where each piece of information can be found on each document. Once an employer has entered the information, the Calculator should tell them whether the employee is eligible for the automatic extension and exactly when the employee's work authorization will expire.

USCIS should do more to make resources easily available and findable to employers and immigrant workers. For example, the revised Calculator should also be linked prominently on all the webpages discussed above, including the I-9 Central page on extensions, the Information for Employers and Employees page, the Form I-765 page, and the relevant sections of the Handbook for Employers. Additionally, USCIS could post a letter to employers on its website that clearly and succinctly explains the work permit extension and who benefits from it. The letter would ideally be on USCIS letterhead and easy to find on the agency's automatic extension webpage.²¹ Applicants could then print out this letter to provide employers with added assurance.

²⁰ USCIS, Handbook for Employers M-274, 5.0 Automatic Extensions of Employment Authorization and/or Employment Authorization Documents (EADs) in Certain Circumstances (last updated Apr. 8, 2024), <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274/50-automatic-extensions-of-employment-authorization-and-or-employment-authorization-documents-eads-in>.

²¹ See USCIS, Employment Authorization Extensions (last updated Nov. 3, 2023), <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents/employment-authorization-extensions>.

7. Do More Outreach to State DMVs

ASAP members have reiterated that USCIS should do more to tell states to give driver's licenses to immigrants who have automatic work permit extensions. Unfortunately, despite language in both the 2022 temporary final rule and the current TFR explaining that the automatic extension should be recognized by benefit-granting agencies such as DMVs,²² some DMV employees refuse to accept ASAP members' work permits subject to the 540-day automatic extension as valid identification. This issue is widespread, and not localized to one particular area. Instead, it seems some DMV employees are not aware of work permit extensions bearing on driver's license eligibility, regardless of whether of the length of the extension.

Access to driver's licenses is an issue of particular importance to many ASAP members who need their driver's licenses to work in essential industries such as truck driving, ride-share services, and delivery services. For these members, work authorization is insufficient to keep their jobs if they cannot also renew their driver's licenses.

ASAP commends USCIS for ensuring that the SAVE program will reflect the TFR's 540-day auto-extension, see 89 Fed. Reg. at 24,649 & n.202, and for conducting engagement sessions with DMVs. However, as ASAP members' reports and questions illustrate, these efforts have proven insufficient. Accordingly, USCIS should conduct more extensive engagements with local DMVs to ensure that they are uniformly granting driver's licenses to immigrants with automatic work permit extensions.

C. Let the Auto-Extension Apply to More Immigrants

Although the TFR will bring much-needed relief to many work permit renewal applicants, it leaves thousands of others unprotected. Specifically, the TFR does not apply to individuals whose pending renewal applications were received by USCIS after the expiration dates of their work permits. The TFR frames this limitation as a "timely fil[ing]" requirement, 89 Fed. Reg. at 24,629, but this requirement did not take into consideration a backlog of 16 months or more. See *id.* at 24,636. And because of

²² See 89 Fed. Reg. at 24,649 ("[I]f another agency accepts unexpired EADs for any purpose (such as establishing identity or, in some situations, immigration status), then the agency should generally accept the EADs that are automatically extended under this rule."); 87 Fed. Reg. at 26,632 ("If a benefit-granting agency accepts EADs, then the agency should accept the EADs that are automatically extended under this rule.").

backlogs, individuals who file even one day after their work permit expires are guaranteed to fall out of the workforce for a year or longer.

Many ASAP members have reported that despite their best efforts, they were unable to successfully file renewal applications before their current work permits expired for reasons generally beyond their control, such as the following:

Rejection of timely filings. Some ASAP members applied to renew their work permits before their work permits expired, but their applications were rejected for technical reasons, such as USCIS errors or minor errors of their own (e.g., typos). Once these members were able to refile their applications, their renewal applications could no longer benefit from the automatic extension.

Financial hardship. Some ASAP members report being unable to file for renewal applications before their current work permits expire because they cannot afford the filing fee. For asylum applicants who are filing a work permit renewal, the application fee is \$470 if they can file online, and \$520 if they are applying with a paper application. As USCIS is aware, inflation has created financial hardships for families throughout the United States. Immigrant families are no different. Many ASAP members have explained that they filed for renewal applications as soon as they were able to save enough money for the filing fee, but that if they were not able to save the money before their work permit expired, their applications ineligible for the automatic extension.

Rejection of fee waiver requests. Some ASAP members did not have the funds to pay the filing fee, so they filed renewal applications with fee waiver requests. However, if their fee waiver request was denied, the renewal application was also rejected. Once these members refiled their renewal applications, their applications were no longer eligible for the automatic extension.

Obstacles to immediately filing. Many ASAP members have explained that they filed their work permit renewal applications only a few days after their work permits expired for reasons including cars breaking down, needing to find someone to help them read the document in English, and other obstacles. Because of the backlog, these individuals must now wait for over a year for their renewal applications to be processed. In the meantime, they are left unable to work to support themselves and their families.

A lengthy and more complicated form. USCIS should recognize that the process of applying for work authorization has become significantly more complex in recent years. Again, since 2017, the Form I-765 has grown from two pages to seven pages.

Furthermore, Form I-765 requires that an applicant certify that they speak English, find an interpreter willing to sign and certify that they translated the document for the applicant, or find a preparer. Many renewal applicants have been surprised to encounter such a complex form, causing reasonable delays in their applications.

Accordingly, **ASAP urges USCIS to broaden the 540-day automatic extension to apply to any renewal application pending on the effective date of the final rule.** Moving forward, we believe the agency should implement a six-month grace period after a work permit expires, during which an individual can apply to renew their work permit and still receive an automatic extension.²³ Given that so many ASAP members and other immigrants report obstacles caused by circumstances outside of their control, these changes would balance the government's interest in addressing the backlog with the economic, social, and humanitarian consequences of unnecessarily depriving people of the ability to work.

VII. DHS Should Make Commenting on Rules More Accessible, Including by Accepting Comments in Languages Other than English

ASAP has attempted to outline ASAP members' primary recommendations and responses to the TFR in this organizational comment. Additionally, ASAP gave members the opportunity to submit their comments to ASAP in their preferred language. Below, ASAP has passed along 165 comments from ASAP members (accompanied by English translations using Google Translate, if written in languages other than English) as part of ASAP's organizational comment.

However, DHS and USCIS should encourage immigrants and asylum seekers to engage in the notice and comment process directly. Consistent with USCIS's mission statement of ensuring "fairness, integrity, and respect for all we serve,"²⁴ DHS and USCIS should seek out guidance from ASAP members and other directly affected individuals, and the agencies should give their insights serious consideration. Based on their firsthand experience navigating the immigration system, ASAP members have a wealth of knowledge about how to improve the system—knowledge from which the government would significantly benefit.

²³ Another alternative for future rulemaking around the Form I-765 would be to add a place where the applicant can explain why they were unable to file their renewal applications before their current work permits expired, and the agency should grant auto-extensions in cases where it deems it warranted.

²⁴ USCIS, Mission and Core Values, <https://www.uscis.gov/about-us/mission-and-core-values>.

To that end, DHS and USCIS should improve the notice and comment process with the goal of encouraging immigrants and asylum seekers to comment. At minimum, to make the process more accessible, DHS and USCIS should translate requests for comment into multiple languages and clearly state that they will accept comments in languages other than English, beginning with accepting comments in Spanish.²⁵

VIII. Conclusion

ASAP commends DHS for ensuring that 800,000 immigrant workers do not lose their jobs due to work permit backlogs. By issuing the TFR, DHS has provided much-needed stability and security to many asylum seekers and other immigrants, their employers, and local communities across the United States. At the same time, for the same urgent reasons that prompted DHS to issue this TFR, DHS and USCIS must undertake significant additional steps—this year—to avoid hundreds of thousands of immigrants falling out of the workforce. Chief among these changes, is lengthening the work permit extension period to 730 days.

USCIS should also make eliminating the work permit processing backlog a top priority for this calendar year. Indeed, failure to timely process work permit renewal applications could expose USCIS to legal liability, as governing regulations contemplate that “application[s] for [work permit] renewal . . . received by [USCIS] 90 days prior to expiration” will be “renewed before [their] expiration.” 8 C.F.R. § 208.7(d).

ASAP respectfully recommends DHS implement the following changes to mitigate harm to applicants:

- (1) DHS should make the TFR permanent;
- (2) DHS should lengthen the auto-extension period to 730 days; and
- (3) USCIS should prioritize work permit processing, take additional steps to alleviate confusion around the TFR amongst employers and DMVs, and expand the number of immigrants covered by the TFR.

²⁵ See, e.g., U.S. Dep’t of Homeland Security, Language Access Plan 5 (Nov. 2023) (“It is the policy of DHS to provide meaningful access for individuals with limited English proficiency”), https://www.dhs.gov/sites/default/files/2023-11/23_1115_dhs_updated-language-access-plan.pdf.

Finally, DHS and USCIS should make the notice and comment process more accessible for asylum seekers and immigrants, including by translating requests for notice and comment and allowing individuals to submit responses in languages other than English, beginning with Spanish. To that end, following this page are 165 comments submitted by ASAP members, who shared their views on the TFR in Arabic, Chinese, English, French, Kreyol, Russian, and Spanish. ASAP urges DHS to give these comments careful consideration, as they are from individuals who themselves have navigated the work permit renewal process.

Respectfully submitted,



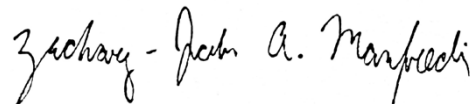
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Marcela Johnson
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Asylum Seeker Advocacy Project
(ASAP)

The following are 165 comments from ASAP members which were submitted in Arabic, Chinese, English, French, Kreyol, Russian, and Spanish. ASAP members shared what they believed should be improved about the TFR, how they felt about work permit delays, and what they think the government should do to fix this problem.

"Increase the budget to review the process of processing working permit and fully Automate the process to a much short waiting time even if the application fee has to increase."

– ASAP member from Cameroon

"Work permit delays keeps us away from the opportunities and this might create a lot of problem at work as lot of companies are doing layoff. Due to our existing work permit status we might in their list of lay off. Government should send letter so that we can have proof of extension to employer."

– ASAP member from Nepal

"Work permit delays keeps us away from the opportunities and this might create a lot of problem at work as lot of companies are doing layoff. Due to our existing work permit status we might in their list of lay off. Government should send letter so that we can have proof of extension to employer."

– ASAP member from Nepal

"It's surprising & unexpected from a country like USA"

– ASAP member from Bangladesh

"They should speed up the entire work permit renewal process."

– ASAP member from Hong Kong

"The government should faster the process. The delays shouldn't be more than 30 days."

– ASAP member from Mauritania

"I feel anxiety"

– ASAP member from Iran

"We are devastated because we're gonna lost our job."

– ASAP member from Burma

"Government should give importance to this matter & reduce bureaucratic procedures."

– ASAP member from Bangladesh

"Increase the resources and staff to work on the work permit applications. Make it a permanent rule or 540 days extension. Reduce the processing times for the renewal applications."

– ASAP member from India

"Yes."

– ASAP member from Venezuela

"Government should give importance to this matter & reduce bureaucratic procedures."

– ASAP member from Bangladesh

"Government should give importance to this matter & reduce bureaucratic procedures."

– ASAP member from Bangladesh

"Send proof of new work permit expiration date so DMV can renew drivers' licenses"

– ASAP member from Nigeria

"Hire more people to help with the work"

– ASAP member from Venezuela

"Notification of extension letters should be sent to individuals so that we have evidence to show our employers."

– ASAP member from Nigeria

"1) We hardly renew the ID every 3 months!!! These 540-day extensions don't help at all!

2) No normal company will hire an employee with this extension. (I haven't been able to find a job for six months!)

3) Stop bullying people! We just want to live normally and work! I don't want to be on benefits, just give me the opportunity to work!"

– ASAP member from Russia

"Super frustrated. The first-time work permit applicants can receive their permit within 30 days. Why can they have the same process for people who are renewing?"

– ASAP member from China

Google translation: "They need to be given permission to work for longer (They need to be given permission to work for a longer period.)"

Original: "**Им нужно дать разрешение на работу на дольше срок** (They need to be given permission to work for a longer period.)"

– ASAP member from Turkey

"Renewal of work permit should be automatic. There's no point of delay a renewal when the government has initially approved the individual to have a work permit in the past."

– ASAP member from Eritrea

"The government should expedite the work permits process"

– ASAP member from South Sudan

“The government should make the work permit application decision faster”

– ASAP member from Nigeria

“I'm so nervous about that, some times I have panic attack because one of the main document is expired. That's frustrating me. That makes me feel unsafe. (As not scheduled a interview already 7+ years when new asylum applicants already has green card been in the US no more than 3 years)”

– ASAP member from Russia

“Longer work permits will benefit all”

– ASAP member from Russia

“They are very stressful, and I dont think its fair”

– ASAP member from South Africa

“The government should dedicate more resources to ensure work permits processing timely.”

– ASAP member from Thailand

“Work permit issuance and renewal should be without delay. This can be enhanced by engaging more hands and opening more processing centers.”

– ASAP member from Nigeria

“The government should have fastest process time for work permit applications.”

– ASAP member from Haiti

“Automatic issue of an indefinite work permit immediately after applying for asylum. Eliminate the requirement to file Form 765. No longer have to wait 180 days.”

– ASAP member from Russia

“Too long”

– ASAP member from Mauritius

“Stressful and frustrating”

– ASAP member from Ethiopia

“Work permits for pending asylum should not have expire date. It can be used as long as the case is pending either in immigration court or USCIS Asylum Office.”

– ASAP member from Burma

“More immigration officers/workers. More transparency with timelines”

– ASAP member from Belarus

“I have been waiting more than 200 days. The process time on USCIS website is for 30 days. They should prioritize work permit issuance by first to come first to serve. I had friends that requested renewal work permit 3 months after than me and they already have the card. my employer is constantly asking me for my renewed permit card. I mean 205 days and I had call them sent emails and I haven't had any answer yet or a concrete answer of what this is taking so long they should hire more people and make sure they are professionals who are reliable and take responsibility on controlling and monitoring all cases so things like this doesn't happen. And keep an eye on case's status This delay on work permit affect our job, our quality of life since we are not able to have a valid driver license. If we want to get a loan or a credit card. Everything. Two years ago I had to wait for 1 year and 6 months to get a renewal.”

– ASAP member from Venezuela

“It has been brought to my attention that there are significant delays in the asylum process, particularly with the Last In First Out system. To address this issue, I would like to suggest prioritizing asylum seekers who are currently contributing to the US society through their employment and tax reporting. Additionally, I believe that USCIS could request proof of high-skilled asylum seekers and expedite their processing, including EAD and asylum interviews. Offering premium services for these processes could not only generate revenue for USCIS but also significantly reduce the backlog. Thank you for considering this proposal.”

– ASAP member from Dominican Republic

“Feeling stress. Give Asylee better opportunity to renewing work permit longer instead of 540 days.”

– ASAP member from Haiti

“I desperately wanted a renewed work permit. I have 3 kids to feed”

– ASAP member from China

“It’s important for updating Driver License and showing employer. Also it causes stress. They should send us a written proof with extension date.”

– ASAP member from China

“Work permit delays makes you insure and vulnerable. You're capable, have the necessary skills and experience to work with jobs available seeking prospective candidates yet because of delays in permit approval, you become unemployed and dependent on others, it's really a worrying situation. Government should decentralised (further) offices and put in more resources to make is easy and faster to acquire work permit. Individual states or even counties should be given that privilege. An avenue to get more taxes and fill in vacant job positions. Avoid tax evasion. A working economy is a successful economy.”

– ASAP member from Ghana

“Hire more interviewer to speed up the process.”

– ASAP member from China

“Any suggestions of this survey should be considered.”

– ASAP member from China

“Hired more employees to shorten the process time.”

– ASAP member from China

“Hire more officials”

– ASAP member from Nigeria

“Those of us who apply already have a magnitude of challenges we are trying to overcome. Work permit delays add to the burden and feels overwhelming. We just want to work, earn an income and take care of our families and responsibilities. The government should please consider this deeply and provide proactive steps to resolving delay issues and tackling the challenges at the root causes.”

– ASAP member from Nigeria

“I am so sad, I can make money to give my kids and my family 😞”

– ASAP member from Egypt

“The government has to put in place a system : First come first Serve”

– ASAP member from Haiti

"Renewals should not take time since information is already in system. Have more manpower to handle applications"

– ASAP member from Zimbabwe

"Extend the expiration day"

– ASAP member from Nigeria

"Make the previous work permit valid until a decision on the renewal application has been made"

– ASAP member from Bangladesh

"Yes"

– ASAP member from Haiti

"Being we're waiting so long and for someone who works as hard as I do. I do love and have great love and respect for this country. The USA Truly I felt so at home here. Am not scared are off to look over my shoulders and have fare for my life that someone is going to kill me for what have worked for or difference of option. I truly believed that we who have waited so long and work so hard they should honor us by giving us our GREEN CARD."

– ASAP member from Jamaica

"It is so stressful more especially when you are thinking of changing a job there is that point you have to prove the employer that can legally work, I think it would be better for the government to make longer work permits than just two years and longer extensions more than 540 days or they should let someone work until a new work permit is renewed as long as they send in there renewed work papers on time. Thanks!"

– ASAP member from Uganda

"Work permit should not take 180 days after asylum apply it should be get within 3 or 4 weeks"

– ASAP member from Pakistan

"Afraid of the possibility of not being able to provide to my family"

– ASAP member from Egypt

"Make decision faster"

– ASAP member from India

"Make the longer work permit extension permanent"

– ASAP member from Haiti

"Without work permit, nothing is possible in the US. In my opinion, it is better to conduct the root cause analysis for the delay and set forth the opportunity for improvement."

– ASAP member from Ethiopia

"Work permits should not have to be "renewed" at all, or at least they should come with 5 year/ longer validity in the first place and extensions should be allowed on applications made AFTER the expiration date too!"

– ASAP member from Bangladesh

"The delays on work permit renders a lot of family homeless because the sustainability of families depends on it. Parents have to work in other to take care of their families. If the government can make the 540 days permanent it will be great"

– ASAP member from Cameroon

"My wife's work permit has been renewed for almost half a year. She is about to lose her current job. I hope the government will quickly process the renewal of the work permit that is about to expire."

– ASAP member from China

"A special automated system needs to be created to process online applications for work permits and issue them."

– ASAP member from Russia

"Prioritize the people who have waiting to long."

– ASAP member from Haiti

"Send new expiration date which is 5 years minimum. Renewal is so expensive."

– ASAP member from Nepal

"I feel unsecured because at any moment something could happen, but if my work permit could be permanent, it would reassure me and make me feel safe. because the expiration date of my last work permit authorization card would be in December 2023, I applied for a new work card since October 16, 2023, that is, more than 60 days before the expiration date, until Now I haven't received anything. On the other hand, I don't feel economically secure."

– ASAP member from Haiti

"Make work permit permanent for people on asylum, TPS, parole whose have been in the country since January 2024."

– ASAP member from Haiti

"I think the government should employ more effective strategies to halt work permit delay."

– ASAP member from Nigeria

"Increase workers"

– ASAP member from Guinea

"Yes"

– ASAP member from Haiti

"Hire more staff/expedite the process"

– ASAP member from Russia

"with the extension of the terms of the work permit, it has been done very well."

– ASAP member from Albania

"Hire additional staff to facilitate the processing of work permits"

– ASAP member from the Philippines

"It's really frustrating while we are waiting for the asylum interview, renew the work permit. Maybe gov should spend more time and money on having more people to work for this case."

– ASAP member from Vietnam

"The government should make the longer work permit permanent until their asylum is decided by the government. This is good relief for both the asylum seekers and the government."

– ASAP member from Ethiopia

"Recruit more competent staff"

– ASAP member from Venezuela

"I think the government should be to prioritize every case in the order that it was solicited"

– ASAP member from Cuba

Google translation: "Accelerate the process if the number of officials is low, hire more and optimize the process to the maximum. The total amount of money is a lot and it is useful to the government."

Original: "Acelerar el proceso si el número de funcionario es poca contratar más y optimizar el proceso al máximo total ese dinero es mucho y al gobierno le sirve"

– ASAP member from Venezuela

Google translation: "Unfortunately, we are not eligible for the 540-day extension because we did not apply for renewal before the work permit expires. Now we have 8 months waiting for the decision on our case. The renewal process should be faster since It is to update information"

Original: "Desdichadamente no somos aptos para la extensión de los 540 días, por no hacer la solicitud de la renovación antes de vencerse el permiso de trabajo, ahora bien tenemos 8 meses esperando la decisión de nuestro caso, el proceso de renovación debería ser más rápido ya que es para actualizar información"

– ASAP member from Venezuela

Google translation: "I feel like I am not taken into consideration"

Original: "Me siento que no soy tomada en consideración"

– ASAP member from Venezuela

Google translation: "Give work permits faster. I've been out of work for a year because I haven't received a work permit."

Original: "Dar los permisos de trabajo más rápido llevo un año sin trabajo porque no me a llegado el permiso de trabajo"

– ASAP member from Cuba

Google translation: "Streamline the process, so that we all have the right to work"

Original: "Agilizar el proceso, para que todos tengamos derecho a trabajar"

– ASAP member from Cuba

Google translation: "It is truly uncomfortable because not all employers are willing to listen to an explanation about the automatic extension of the work permit, you simply do not have the document and you are rejected, the driving license renewal procedures become very complex when one does not You physically have a valid work permit card, it is complex for any procedure, including health insurance... I think that a renewal of the work permit can be quickly approved by asking for evidence of the use that the person has made of the expiring work permit, say proof of employment, appraisal letter from the employer, tax payments, in short, a dignified use of the work permit that leads meritorious and quickly to its renewal..."

Original: "Es verdaderamente incómodo porque no todos los empleadores tienen la voluntad d escuchar una explicación acerca de la extensión automática del permiso de trabajo, simplemente no tienes el documento y eres rechazado, igual se hace bien complejo los trámites de renovación de licencia de conducción cuando uno no tiene físicamente una tarjeta vigente de permiso de trabajo, es complejo para cualquier trámite incluso seguros de salud....pienso q una renovación del permiso de trabajo puede ser rápidamente aprobada pidiendo evidencias del uso que la persona ha hecho del permiso de trabajo que vence, dígase constancia en un empleo, carta de valoración del empleador, pagos de taxes, en fin un uso digno del permiso d trabajo que conlleve de forma meritoria y rápida a una renovación del mismo...."

– ASAP member from Cuba

Google translation: "The truth is that it is very disconcerting not to be able to work while having needs due to lack of a permit. This process should be made more streamlined."

Original: "La verdad es muy desconcertante no poder trabajar teniendo necesidades por falta de un permiso. Debería de agilizar más este proceso."

– ASAP member from Cuba

Google translation: "So far I have not had any problems since I have not done the first renewal, but I also think that it would be more viable if the extensions were for a longer period than the current one."

Original: "Hasta el momento no he tenido inconvenientes ya que no he hecho la primera renovación, pero igualmente pienso que serían más viable que las extensiones fueran por un periodo mas prolongado al actual."

– ASAP member from Colombia

Google translation: "Hire more staff to respond to requests in immediate time"

Original: "Contratar más personal que responda las solicitudes en tiempo inmediato"

– ASAP member from Venezuela

Google translation: "Hire more people to review those requests and approve them. This will allow many people to continue working, which is good for the country's economy. We all win."

Original: "Contratar más gente para que revisen esas solicitudes y aprobarlas. Eso va permitir a muchas personas seguir trabajando, lo cual es bueno para la economía del país. Todos salimos ganando."

– ASAP member from El Salvador

Google translation: "Expedite permits"

Original: "Agilizar los permiso"

– ASAP member from Cuba

Google translation: "When there is a delay in work permits, people get stressed because we feel that we cannot work properly and this generates uncertainty."

Original: "Cuando hay retraso en los permisos de trabajo las personas nos estresamos por qué nos sentimos que no podemos trabajar como es debido y esto genera incertidumbre"

– ASAP member from Colombia

Google translation: "I sent my renewal 6 months ago and the status does not change and they do not tell me how long it takes now I cannot get my license and renew it the government should let me renew the license for 540 days while they respond to the Work permit"

Original: "Yo envié mi renovación hace 6 meses y no me cambia el estado y tampoco me dicen cuánto tarda ahora no puedo sacar mi licencia y renovarla el gobierno debería dejar renovar la licencia por 540 días mientras responden el Permiso de trabajo"

– ASAP member from Colombia

Google translation: "I feel bad because I could lose my job, the government should prioritize us more"

Original: "Me siento mal porque puedo perder mi empleo ,el gobierno debería priorizarnos más"

– ASAP member from Cuba

Google translation: "Higher budget to expedite requests"

Original: "Presupuesto más alto para agilizar las solicitudes"

– ASAP member from Venezuela

Google translation: "I think the government should hire more staff to help Uscis process all backlog work permits and give priority to those who have been without this document for the longest time. That would be a just cause"

Original: "Creo que el gobierno debería hacer más contrataciones del personal para ayudar a Uscis a procesar todos los permisos de trabajos atrasados y dando prioridad a los que llevan más tiempo sin este documento. Eso sería una justa causa"

– ASAP member from the Dominican Republic

Google translation: "give the residences"

Original: "dar la residencias"

– ASAP member from El Salvador

Google translation: "I should extend it"

Original: "Debería extenderlo"

– ASAP member from Cuba

Google translation: "Hurry a little, I have been without a work permit for almost a year"

Original: "Apresurar un poco llevo casi un año sin el permiso de trabajar"

– ASAP member from Cuba

Google translation: "Give a quicker response so you don't lose your job because your permit has expired."

Original: "Dar respuesta más rápido para uno no perder el trabajo por tener el permiso vencido"

– ASAP member from Venezuela

Google translation: "Prioritize those of us who have lived in the United States for years and comply with the laws, because personally I renewed my work permit 1 year ago and I still have not received the renewal and my work permit expires in June of this year 2024"

Original: "Priorizar a los que tenemos años de vivir en Estados Unidos y cumplimos con las leyes, porque en lo personal hace 1 año renové mi permiso de trabajo y todavía no recibo la renovación y mi permiso de trabajo vence en junio de este año 2024"

– ASAP member from Honduras

Google translation: "Put more staff in this task or automatically issue the cards when it is renewable"

Original: "Poner mas personal en esta tarea o q se emita automáticamente las tarjetas cuando es removable"

– ASAP member from Cuba

Google translation: "It is frustrating not knowing what is happening, no communication from the government, nothing."

Original: "Es frustrante no saber que pasa, ninguna comunicación de parte del gobierno nada."

– ASAP member from Honduras

Google translation: "It generates great uncertainty in the immigration status of the asylum seeker. The government should prioritize renewals and applications for work permits instead of generating extensions, the problem must be solved at its root"

Original: "Genera gran incertidumbre en el estatus migratorio del solicitante de asilo. El gobierno debería priorizar renovaciones y solicitudes de permisos de trabajo en lugar de generar extensiones, debe resolverse el problema de raíz"

– ASAP member from Venezuela

Google translation: "Take into account when the replacement request is made by Uscis to send them faster."

Original: "Tener en cuenta cuando la solicitud de reemplazo es por parte de Uscis para enviarlos más rápido."

– ASAP member from Venezuela

Google translation: "Se siente de madre"

Original: "It feels like a mother"

– ASAP member from Russia

Google translation: "Give them faster"

Original: "Entregarlos más rápidos"

– ASAP member from Venezuela

Google translation: "Those who renew digitally, if they meet the requirements to maintain their permit, will automatically be issued a digital work permit that can be shown if needed. This would alleviate the time for those who submit their application for the first time and need more verifications to grant it."

Original: "Aquellos que renueven de manera digital, si cumplen con los requisitos para mantener su permiso, que se le emita de manera automática un permiso de trabajo digital que se pueda mostrar en caso de necesitarlo. Esto aliviaría los tiempos de aquellos que presentan por primera vez su solicitud y necesitan más verificaciones para otorgárselo."

– ASAP member from Cuba

Google translation: "Help me with the work permit"

Original: "Ayudarme con el permiso de trabajo"

– ASAP member from Haiti

Google translation: "The government must do an AUTOMATIC RENEWAL for all permits unless the government decides to suspend the permit for obvious reasons and so employers do not lose time and money for the training given to their employees."

Original: "El gobierno debe hacer una RENOVACION AUTOMATICA, para todos los permisos a menos de que el gobierno decida suspender el permiso por razones obvias y así los empresarios No pierden tiempo y dinero por el entrenamiento dado a sus empleados."

– ASAP member from Venezuela

Google translation: "I am afraid in case someone does not want to accept the document that I currently have, which is only proof of payment for the renewal."

Original: "Siento temor por si alguien no quiere aceptar el documento que tengo actualmente que solo es el comprobante de pago de la Renovación"

– ASAP member from Colombia

Google translation: "Give us all the green card and so we don't have to wait for anything and so we all pay taxes and help the country that helps us"

Original: "Darnos la green card a todos y así no tenemos que esperar nada y así todos pagamos impuestos y ayudamos l país que nos ayuda"

– ASAP member from Colombia

Google translation: "It is really worrying when the expiration date of our work permit is approaching, what are we going to do if we are fired if the permit does not arrive on time, how do we face the expenses that come with the uncertainty of losing our job, How we pay, rent, food, bills, gasoline, etc. It is a lot of physical and mental wear and tear that overwhelms us, both adults and children, we are all affected by this

situation!... We suggest giving priority to those who have been waiting the longest and not to those who recently requested it, although for them too They need it to be able to be employed legally. Also that this extension can be greater than 540 days and be done permanently! Also extend the permit for at least 5 years, I have seen permits for that period of time and it does not seem unreasonable to be able to benefit for that period of time! Thank you very much for reading us and taking us into account! Blessings!."

Original: "Realmente es preocupante cuando se nos acerca la fecha de vencimiento de nuestro permiso de trabajo, que vamos a hacer si nos despiden en caso de no llegar a tiempo dicho permiso, como enfrentamos los gastos que se nos vienen con la incertidumbre de quedarnos sin trabajo, como pagamos, renta, comida , billes, gasolina, etc. Es mucho desgaste físico y mental que nos agobia, tanto a adultos como a niños, todos nos vemos afectados por esta situación!... Les sugerimos darle prioridad a los que llevamos más tiempo esperando y no a los que recientemente lo solicitan, aunque para ellos también lo necesitan para poder emplearse de manera legal. También que esa extensión pueda ser mayor a los 540 días y se haga de manera permanente!. También extender el permiso a por lo menos 5 años, he visto permisos por ese periodo de tiempo y no me parece descabellado el poder ser beneficiados por ese periodo de tiempo!. Muchas gracias por leernos y tomarnos en cuenta!. Bendiciones!."

– ASAP member from Venezuela

Google translation: "Send a document that indicates that the process is in progress"

Original: "Enviar un documento que indique qué el proceso está en trámite"

– ASAP member from Colombia

Google translation: "I feel frustrated, anxious and confused because our family submitted different applications at the same time and the ones that have been approved were approved on different dates even though they were submitted on the same day. I think that in addition to the suggestions I marked above, I think that

extending the validity date of the work permits would provide more peace of mind and time for you to carry out the renewals."

Original: "Me siento frustrado, ansioso y confundido porque nuestra familia envió las diferentes solicitudes al mismo tiempo y los que han sido aprobados, los aprobaron en fechas diferentes aunque se enviaron el mismo día. Creo que ademas de las sugerencias que marque anteriormente, creo que ampliar la fecha de vigencia de los permisos de trabajo brindaria mas tranquilidad y plazo para que pueda realizar las renovaciones"

– ASAP member from Venezuela

Google translation: "Decentralize the work permit office and place offices in each state so that they can process those that correspond to their state"

Original: "Descentralizar la oficina de permisos de trabajo y colocar oficinas en cada estado para que estos tramiten los que correspondan a su estado"

– ASAP member from Venezuela

Google translation: "Make immigration reform"

Original: "Hacer una reforma migratoria"

– ASAP member from Venezuela

Google translation: "I feel bad because I haven't sent my work permit yet and it's been more than 6 months since I applied for it."

Original: "Me siento mal porque aun no mean embiado mi permuso de trabajo y ase mas de 6 meses que lo solisite"

– ASAP member from Cuba

Google translation: "Powerless because if we give up our asylum they should send us work permits so we can continue contributing to the country"

Original: "Impotente porque si entregamos nuestro asilo deberían de mandarnos los permisos de trabajo para así seguir aportando al país"

– ASAP member from Peru

Google translation: "Streamline procedures, having more information channels and putting more personnel in charge."

Original: "Agilizar los trámites, teniendo más canales de información y poniendo más personal a cargo."

– ASAP member from Nicaragua

Google translation: "All of us who wait for the work permit are contributing to the country, giving the best of ourselves, paying taxes, and following the rules of good citizenship, we collaborate with the church to which we are affiliated, therefore helping the economy. and growth of the country, and we will continue doing so if they expedite the service of work permits, we want to work and continue growing with this country."

Original: "Todo los que esperamos por el permiso de trabajo estamos contribuyendo con el pais, dando lo mejor de nosotros , pagando los impuestos , y siguiendo las normas del buen ciudadano, colaboramos con la iglesia a la cual estamos afiliados, por lo tanto ayudando a la economia y crecimiento del pais , y lo seguiremos haciendo si agilizan el servicio de los permisos de trabajo , queremos es trabajar y seguir crecienod con este pais."

– ASAP member from Venezuela

Google translation: "The waiting time for renewals is STRESSFUL, it should work just as vehicle permits are renewed, one stick for every 5 years and that's it."

Original: "The waiting time for renewals is STRESSFUL, it should work just as vehicle permits are renewed, one stick for every 5 years and that's it."

– ASAP member from Venezuela

Google translation: "Prioritize requests from people who are waiting for a long time. I have been waiting for my card for 4 months and it has affected me in the workplace because they do not believe there can be an extension since without the card for companies it is difficult to believe"

Original: "Priorizar las solicitudes de las personas que están esperando por varios tiempo. Yo llevo 4 meses esperando mi tarjeta y me ha afectado en los lugares de trabajo porque no creen que pueda haber una extensión ya que sin la tarjeta para las compañías es difícil de creer"

– ASAP member from Honduras

Google translation: "I am affected since my driver's license has expired, I pay my taxes every year, but now it is difficult for me to have a job, I have been waiting for a response for 80 days to renew my work permit, I made a previous request and it was rejected"

Original: "Me veo afectado ya que tengo expirada la licencia de conducir, pago mis taxes cada año, pero ahora se me dificulta tener empleo, llevo 80 días esperando respuesta para la renovación de mi permiso de trabajo, realicé una solicitud anterior y me fue rechazada"

– ASAP member from Colombia

Google translation: “look for a better system to organize backlogged procedures”

Original: “buscar un mejor sistema para organizar los procedimientos atrasados”

– ASAP member from Cuba

Google translation: “Accelerate to do them faster”

Original: “Acelerar para que los realicen más rápido”

– ASAP member from Venezuela

Google translation: “Send an approximate date by email, while they work on the process”

Original: “Enviar por email una fecha aproximada, mientras ellos trabajan en el proceso”

– ASAP member from Colombia

Google translation: “Work permits should have a longer validity.”

Original: “Los permisos de trabajo deberían tener una vigencia más larga.”

– ASAP member from Venezuela

Google translation: "It is frustrating to wait so long for a work permit renewal, I think they should implement an online system in which they automatically verify your status online, receive your payment online and give you your renewal online at once so you can print your proof, people should not have to wait so long because it is an absurd amount of time and all people need to work to survive."

Original: "Es frustrante esperar tanto tiempo por una renovación de permiso de trabajo, pienso que deberían implementar un sistema en línea en el que automáticamente verifiquen su estatus en línea reciban su pago en línea y le den de una vez su renovación en línea y poder así imprimir su comprobante, no deberían tener las personas que esperar tanto tiempo por que es un tiempo absurdo y todos la personas necesitan trabajar para poder subsistir."

– ASAP member from Colombia

Google translation: "I have been waiting almost a year for the renewal of my work permit. The Government needs to pay more attention to those permits that have been taking longer."

Original: "Llevo ya esperando casi un año por la renovación de mi permiso de trabajo el Gobierno necesita prestarle más atención a esos permisos que llevan demorando más tiempo."

– ASAP member from Guatemala

Google translation: "Automate the work permit renewal process to make it simpler so that you can approve it faster with the resources you have or place more resources in this area. The work permit is vital for families who have income that depends on an employer and also for those who must renew driving licenses"

Original: "Automatizar el proceso de renovación de permiso de trabajo hacerlo más simple para que pueda con los recursos que tiene aprobar más rápido o colocar más recursos en esta área. El permiso de trabajo es vital para las familias que tienen

ingresos que dependen de de un empleador y también para quienes deben renovar licencias de conducción”

– ASAP member from Venezuela

Google translation: “They have to work faster to have the work permit as soon as possible.”

Original: “Ellos tienen que trabajar más rapido para tener el permiso de trabajo lo más pronto que posible.”

– ASAP member from Haiti

Google translation: They have to work faster to have a work permit as soon as possible.”

Original: “Ellos tienen que trabajar más rapido para tener el permiso de trabajo lo más pronto que possible”

– ASAP member from Haiti

Google translation: “I feel very bad because I find myself unable to work and also without a work permit you cannot join society. In my opinion one should receive a work permit as soon as possible to be able to develop in the country without problems.”

Original: “Me siento muy mal porque me encuentro imposibilitado de poder trabajar y además sin el permiso de trabajo no puedes incorporarte a la sociedad. En mi opinión uno debería recibir el permiso de trabajo lo más pronto posible para poder desarrollarte en el país sin problemas”

– ASAP member from Cuba

Google translation: "The government should automatically approve permits, at least for asylum seekers, given the condition of the process that gives rise to the permit request."

Original: "El gobierno debería aprobar automáticamente los permisos, al menos para los solicitantes de asilo, dada la condición del trámite que origina la solicitud del permiso."

– ASAP member from Venezuela

Google translation: "Give it priority"

Original: "Darle prioridad"

– ASAP member from Cuba

Google translation: "Delay generates anxiety and risk of losing your job. The validity should be longer."

Original: "El retraso genera angustia y riesgo de perder el trabajo. La vigencia debe ser más larga."

– ASAP member from Venezuela

Google translation: "On a tightrope since our jobs are pending the expiration date and they pressure us to present the current permits or they will leave us waiting while they give us the new valid permit. At least it also affects me with the Department of Labor because they do not release our unemployment collection accounts until we prove that we are authorized to work in the United States. Submitting letters to the labor

department is not reliable because they want to see the current card or an extension letter. At least it took a lot for me to get the extension letter."

Original: "En una cuerda floja ya que en nuestros trabajos están pendientes de la fecha de expiración y nos presionan para presentar los permisos vigentes o nos dejarán en espera mientras nos dan el permiso nuevo vigente. Al menos a mí me afecta también con el departamento de labor porque no nos liberan las cuentas de colección de desempleo hasta que no demostremos que estamos autorizados para trabajar en los estados unidos. Presentar cartas al departamento de labor no es algo confiable porque ellos desean ver la tarjeta vigente o una carta de extensión. A menos a mí me costó mucho que me dieran la carta de extensión."

– ASAP member from El Salvador

Google translation: "Understand the new permit card in one go since when it expires they take us out of work"

Original: "Entender de un solo la nueva tarjeta de permiso ya que cuando vence nos sacan de los trabajos"

– ASAP member from El Salvador

Google translation: "more staff and improve the shipping system since USPS loses a lot of emails"

Original: "mas personal y mejorar el sistema de envio ya que usps pierde mucho los correos"

– ASAP member from Venezuela

Google translation: "Prioritize renewals and expedite the process since the price of work permits increased"

Original: "Priorizar las renovaciones y agilizar el trámite ya que el precio de los permisos de trabajo aumentó"

– ASAP member from Cuba

Google translation: "Give USCIS more priority"

Original: "Darle más prioridad a USCIS"

– ASAP member from Cuba

Google translation: "Prioritize those of us who are waiting so that they don't take too long"

Original: "Priorizar a los q estamos en espera 🙏🙏 a que no tarden mucho"

– ASAP member from Afghanistan

Google translation: "Activate more staff"

Original: "Activar mas personal"

– ASAP member from Venezuela

Google translation: "In my opinion, I think it would be good if they put more importance on it because there are many people who want to work well with our work permit but the expiration time is very short."

Original: "En mi punto creo q fuera buena q pusieran más importancia porq hay muchas personas q queremos trabajar bien con nuestro permiso de trabajo pero el tiempo de vencimiento es muy corto"

– ASAP member from Honduras

Google translation: "Give work permits for 540 days or more"

Original: "Dar los permisos de trabajo por 540 días o más"

– ASAP member from Venezuela

Google translation: "You should give priority to applications from people who have been waiting the longest for a work permit."

Original: "Debería darle prioridad a las solicitudes de las personas que tienen más tiempo esperando por el permiso de trabajo."

– ASAP member from Honduras

Google translation: "It is uncomfortable, since there are some companies that still do not accept or understand that this extension is real, such as banking entities."

Original: "Es incomodo, ya que hay algunas empresa que aún no acepta ni entienden que dicha extensión es real, como por ejemplo las entidades bancarias."

– ASAP member from Venezuela

Google translation: "I am worried, I have almost reached the 540 days of the extension, I have a good job but if I do not receive the renewal, I could lose it, they ask

me for the card to be able to renew my contract and that worries me since I am alone and alone I pay for my things."

Original: "estoy preocupada, ya casi llego a las 540 dias de la extension, tengo un buen trabajo pero si no me llega la renovacion, puedo perderlo, ellos me piden la tarjeta para poder renovar mi contrato y eso me preocupa ya que yo estoy sola y solo yo pago mis cosas."

– ASAP member from Venezuela

Google translation: "HIRE PERSONNEL TO ATTEND THE EAD'S SOON. TAKE INTO ACCOUNT SPECIAL CASES - EMERGENCIAS."

Original: CONTRATAR PERSONAL PARA ATENDER LOS EAD's MAS PRONTO..
TENER EN CUENTA CASOS ESPECIALES - EMERGENCIAS.."

– ASAP member from Colombia

Google translation: "Try to look for alternatives so as not to delay so much because that delay does not hurt much."

Original: "Tratar de buscar alternativas para no demorar tanto por que ese retraso no perjudica mucho"

– ASAP member from Colombia

Google translation: "I don't have a work permit, I feel very bad because I can't work and when you don't work you can't do anything because everything is paid for, I suffered a lot from hunger, I don't even have anything to eat, please help me get a permit so I can have the opportunity to work here please, God bless you"

Original: "No tengo permiso de trabajo, me siento muy mal porque no puedo trabajar y cuando uno no trabaja no se puede hacer nada porque todo se paga, yo sufrí mucho de hambre, hasta para comer no tengo nada, por favor ayúdame conseguir el permiso para poder tener oportunidad trabajar aquí por favor, Dios le bendiga"

– ASAP member from Haiti

Google translation: "It generates a situation of overwhelm and extreme concern, since you cannot do any of the procedures to renew your driver's license and the banking system blocks the movements and procedures that are essential to evacuate and also other procedures and activities, it ends up generating a level of stress and concerns that could be avoided."

Original: "Genera una situación de agobio y extrema preocupación, ya que no puedes hacer nada de trámites de renovar licencia de conducir y el sistema bancario te bloque los movimientos y gestiones que son elementales evacuar y asimismo otras gestiones y actividades, concluye generando un nivel de stress y preocupaciones que se podrían evitar."

– ASAP member from Honduras

Google translation: "On hold"

Original: "En espera"

– ASAP member from Venezuela

Google translation: "I think they should give a little shorter answers."

Original: "Creo deberían dar respuestas un poco más cortas"

– ASAP member from Venezuela

Google translation: "Give priority to the oldest"

Original: "Dar prioridad a los más antiguos"

– ASAP member from Honduras

Google translation: "Get more up to date with work permits"

Original: "Ponerse más al día con los permisos de trabajo"

– ASAP member from Honduras

Google translation: "I feel that although the 540 day extension is a positive thing, in my case I paid for the renewal of my work permit and really, beyond the extension I really hope that my renewed work permit arrives, because if I don't It seems disrespectful that I pay for a service and do not receive what I request."

Original: "Siento que si bien la extensión de los 540 días es algo positivo, en mi caso yo pagué por la renovación de mi permiso de trabajo y realmente, más allá de la extensión realmente espero que me llegue mi permiso de trabajo renovado, porque si no me parece un irrespeto que yo pague por un servicio y no reciba lo que solicite."

– ASAP member from Venezuela

Google translation: "I have been waiting almost a year for the renewal of my work permit. The Government needs to pay more attention to those permits that have been taking longer."

Original: "Llevo ya esperando casi un año por la renovación de mi permiso de trabajo el Gobierno necesita prestarle más atención a esos permisos que llevan demorando más tiempo."

– ASAP member from Guatemala

Google translation: "I have been waiting almost a year for the renewal of my work permit. The Government needs to pay more attention to those permits that have been taking longer."

Original: "Llevo ya esperando casi un año por la renovación de mi permiso de trabajo el Gobierno necesita prestarle más atención a esos permisos que llevan demorando más tiempo."

– ASAP member from Guatemala

Google translation: "The extension should automatically reach the applicants because there is work that expels us 2 to 3 months before the expiration"

Original: "Automáticamente deberían llegar la extensión a los solicitantes porque hay trabajo que nos expulsan 2 a 3 meses antes del vencimiento"

– ASAP member from Haiti

Google translation: "The government should streamline this process by using some algorithm that automatically renews work permits if the person applying still has their asylum case open."

Original: "El gobierno debería optimizar este proceso utilizando algún algoritmo que renueve automáticamente los permisos de trabajo si la persona que lo solicita aún tiene su caso de asilo abierto."

– ASAP member from Cuba

Google translation: "I feel very worried, the delay is a long time, we need it to be quick."

Original: "Me siento muy preocupada es mucho tiempo el retraso necesitamos q sea rapido"

– ASAP member from Honduras

Google translation: "Sad because I came to this country to work to support my family. I have two children who depend on me and without work I cannot support them. Thank you very much. It would be an honor for me if you would take my humble opinion into account."

Original: "Triste porque yo vine a este país a trabajar para sacar adelante a mi familia tengo dos hijos que dependen de mí y sin trabajo no puedo sacarlos adelante muchas gracias sería un honor para mi si tomaran en cuenta mi humilde opinion"

– ASAP member from Guatemala

Google translation: "I've been waiting for a work permit for the first time for 8 months."

Original: "Llevo 8 meses esperando permiso de trabajo por primera vez."

– ASAP member from Cuba

Google translation: "I feel very very sad because I don't want to lose my job."

Original: "Me siento muy muy triste porque no quiero perder mi trabajo."

– ASAP member from Haiti

Google translation: "Be practical."

Original: "Ser práctico."

– ASAP member from Venezuela

Google translation: "Solve the renewal of work permits at least."

Original: "Solucionarlo al menos la renovación de permisos de trabajo."

– ASAP member from Cuba

Google translation: "I feel that work permit renewals need to be approved faster, so I think the government should spend more time resolving work permit renewals."

Original: "Siento que es necesario que las renovaciones de permisos de trabajo sean aprobadas más rápido, por lo que creo que el gobierno debe dedicar más tiempo a resolver las renovaciones de permisos de trabajos."

– ASAP member from Cuba

Google translation: "Prioritize people waiting, we only want to work under the law."

Original: "Priorisar las personas en espera, solo queremos trabajar bajo la ley."

– ASAP member from Peru