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United States Citizenship and Immigration Services

cc. Joseph B. Edlow, Director, U.S. Citizenship and Immigration Services, Department of Homeland Security
The Honorable Markwayne Mullin, Secretary, Department of Homeland Security
The Honorable Mike Johnson, Speaker of the United States House of Representatives, U.S. House of Representatives
The Honorable Hakeem Jeffries, Minority Leader, U.S. House of Representatives
The Honorable John Thune, Majority Leader, United States Senate
The Honorable Charles Schumer, Minority Leader, United States Senate

September 28, 2026

RE: Request to Provide Public Comment on Affirmative Asylum Referrals Without Interview; DHS Docket No. USCIS-2026-0199; RIN 1615-AD18

Dear Associate Director Kim,

By notice issued on **July 28, 2026**, the Department of Homeland Security (DHS, “the Department”) has published an interim final rule with request for comments on the procedure by which affirmative asylum cases for some classes of asylum seeker are to be adjudicated.

Hispanic Federation (HF) respectfully submits the following comment in response to DHS and DOJ request for comment on the IFR and proposed rulemaking, CIS No. 2851-26; DHS Docket No. USCIS-2026-0199; RIN 1615-AD18 (“the Rule.”) Hispanic Federation’s analysis clarifies that the Department erred in its determination that several significant reliance interests were of minor concern, notably familial interests but also small entities. These procedural oversights in conjunction with expected consequences to asylum seekers, their families, and local communities, are sufficient for Hispanic Federation to urge full rescission of the Rule.

1. Hispanic Federation Interest in Rule

Hispanic Federation is a nonprofit membership and advocacy organization with a network of over 850 organizations across the country. HF is committed to empowering and advancing the Hispanic community, with a focus on low-income, marginalized, and immigrant Latinos. With

programs in 40 states, Puerto Rico, the U.S. Virgin Islands and the District of Columbia, HF's focus areas include immigration, economic empowerment, civic engagement, disaster relief, philanthropy, education, health, and the environment. HF also maintains ongoing immigration advocacy and welcome campaigns and meets the organizational development needs of its member agencies through grant-making and capacity-building assistance.

Per DHS' invitation to interested parties to submit relevant written data, views, or arguments on the interim final rule, we address here the IFR's likely increase in denials of affirmative asylum applications, its intersections with other contemporary policy changes that are likely to exacerbate the Rule's impact beyond the scope of the Department's consideration, and shortcomings in the Department's Regulatory Impact Analysis which underscore the prospect that the effects of the Rule will be far more sweeping than the Department contends.

2. Contextualizing Asylum in Contemporary Conditions

Asylum is a statutory right by US and international law. Prospective asylees come to the United States seeking refuge from persecution, violence, or other unstable conditions. In turn, those individuals face intense scrutiny into the validity of their claims, with even children and families subjected to rigorous screening. With asylum guaranteed by U.S. statute and international law to which the U.S. is a signatory,¹ the U.S. must continue to accept and process asylum applications.

Immigrant workers drive the American economy. Immigrants represent a staggeringly high rate of essential workers, including in construction, farmwork, fabrication, and maintenance; many of these essential immigrant workers are Latino.² Likewise, the economic contribution of immigrants, who pay taxes, including Social Security payroll taxes without eligibility for federal entitlements, is helping ensure current and future retirees are receiving their full benefits.

Immigrant workers are essential not only in the agricultural sector, but in supporting the rural economies which sustain America's breadbasket. Rural demographic analysis shows that while rural counties have faced a natural population decrease of over 100,000 since the pandemic, immigration offsets those decreases. Without immigration, over 50% of rural America would instead have faced population declines.³

¹ Convention Relating to the Status of Refugees (adopted July 28, 1951, entered into force Apr. 22, 1954) 19 U.S.T. 6259, 189 U.N.T.S. 137 ("Refugee Convention"); Protocol Relating to the Status of Refugees (adopted Jan. 31, 1967, entered into force Oct. 4, 1967) 19 U.S.T. 6223, 606 U.N.T.S. 267 ("Protocol"), cited at 138, USCIS NPRM, abbreviation convention adopted here.

² <https://www.pewresearch.org/race-and-ethnicity/2016/11/03/occupations-of-unauthorized-immigrant-workers/> (Accessed 7/10/25); <https://www.wusf.org/politics-issues/2023-11-30/undocumented-living-working-floridas-strict-immigration-law-palm-beach> (Accessed 7/10/25)

³ Sarah Melotte, "International Immigrants Drive Rural Population Growth," *Daily Yonder*, 5/28/25. (Accessed 5/29/25.)

Those born outside the United States account for approximately 7.5 percent of the U.S. citizen population,⁴ and U.S. families that include immigrant family members comprise nearly 30 percent of all U.S. households.⁵ These households contribute billions in tax-dollars each year,⁶ operate a disproportionate rate of small businesses,⁷ including firms employing millions of workers,⁸ and staff hundreds of thousands of vital community-oriented positions, from nurses to teachers.⁹ Today, more than 2.3 million asylum seekers are employed in essential sectors, including industries such as construction and transportation that face persistent labor shortages.¹⁰ These data clarify the irreplaceable role of asylee laborers in this country, and therefore, of supporting humane and legible pathways for asylum seekers to navigate the U.S. system. Despite USCIS's repeated assertions, reducing immigration and enforced deportations do not increase jobs for U.S. citizens.¹¹ It is economically destructive to attempt to solve a shortfall of bureaucratic capacity by truncating the pool of eligible applicants through imposing more red tape. Fully reckoning with the impact of the Rule requires understanding this population and the ways in which proposed changes would disrupt them.

Over time, asylum seekers, their families, employers, and communities have come to rely on this framework. Asylum seekers and refugees definitionally come from countries other than the United States with differentiated legal and bureaucratic cultures, many come from underprivileged backgrounds or have lower English proficiency,¹² a wide proportion are engaged in the convoluted administrative process of having higher educational degrees earned in their country of origin recognized in the United States,¹³ and all are responding to rapidly shifting life circumstances. This combination of circumstances renders a unidirectional review of paperwork a particularly inapt medium for review of personal histories. While asylum seekers may believe they have submitted all relevant information, operating under the assumption that certain implicit

⁴ <https://www.census.gov/popclock/> (Accessed 8/20/26); <https://www.pewresearch.org/short-reads/2025/08/21/key-findings-about-us-immigrants/>. (Accessed 8/20/26)

⁵ <https://www.migrationpolicy.org/journal/spotlight/frequently-requested-statistics-immigrants-and-immigration-united-states> (Accessed 8/20/26)

⁶ <https://www.vox.com/policy-and-politics/2019/4/17/18411975/tps-immigrants-pay-billions-in-taxes> (Accessed 5/2/25); <https://itep.org/study-undocumented-immigrants-contribute-nearly-100-billion-in-taxes-a-year/> (Accessed 5/2/25)

⁷ <https://news.mit.edu/2022/study-immigrants-more-likely-start-firms-create-jobs-0509> (Accessed 8/20/26)

⁸ https://advocacy.sba.gov/wp-content/uploads/2022/10/Small-Business-Facts_Immigrant-Business-Ownership_508c_V2.pdf (Accessed 8/20/26)

⁹ <https://www.kff.org/immigrant-health/the-role-of-immigrants-in-the-u-s-health-care-workforce/> (Accessed 8/20/26)

¹⁰ See fwd.us, *People seeking asylum are contributing to the workforce* (Jan. 31, 2026), <https://www.fwd.us/news/people-seeking-asylum-are-contributing-to-the-workforce/>.

¹¹ “Mass deportations don’t lead to more jobs for Americans. Why does the myth persist?” *Make Me Smart*: Ep. 1557, *Marketplace*, Apr. 23, 2026, <https://www.marketplace.org/episode/2026/04/23/mms-423> (Accessed 4/24/26.)

¹² <https://acf.gov/sites/default/files/documents/orr/2023-ASR-Snapshot-Brief.pdf>

¹³ “Who Seeks Asylum in the United States and Why?” <https://bioethics.hms.harvard.edu/journal/displacement-crisis>

details of their applications are apparent, salient information may in fact go unnoticed or be lost in translation. Asylum interviews offer a bidirectional setting in which applicants may share details that only become clearly germane in the unique setting, and for asylum officers to seek greater clarity about an individual in a non-adversarial setting. Indeed, these benefits of interviews are hardly unique to the asylum process: the efficacy of a direct interview versus unidirectionally provided written materials are well-documented across a range of disciplines, from academic research to human resources.¹⁴ Consequently, the asylum interview provides an irreplaceable avenue by which asylum seekers may outline their personal circumstances in a format that facilitates more effective, coherent, and complete analyses of admissibility, particularly for those with complicated cases.¹⁵

3. The Rule Likely Deleterious to Case Outcomes

The Department makes several erroneous assumptions in both its justification for the Rule and its regulatory impact analysis which render the entire proposal specious, including fundamental misunderstandings of the underlying dynamics of the asylum process, inadequate fiscal analysis of the consequences of the Rule, and spurious claims about the impact of the Rule on American families. Hispanic Federation briefly outlines these concerns below, but we emphasize here that the combined takeaway is that the Rule was issued contrary to general welfare and many of USCIS's stated intentions in the IFR publication.

Many of the assumptions undergirding the analysis used in support of the Rule fail to consider parallel policy changes implemented by other federal agencies, including the Departments of Homeland Security and State, which complicate the picture USCIS presents. For instance, USCIS presupposes that the decision to limit the Rule to populations which do not possess a documentary basis beyond their affirmative application for asylum will limit its reach. While that may be hold in the abstract relative to the asylum-seeking population as it stood in Fiscal Year 2023 (the last year for which much public data on the population exists), the target population is already ballooning drastically under unprecedented de-documentation unleashed by the revocation of Temporary Protected Status from hundreds of thousands of immigrants.¹⁶

¹⁴ For instance: Robert L. Dipboye, Gaile A. Fontenelle, and Kathleen Garner, "Effects of Previewing the Application on Interview Process and Outcomes," *Journal of Applied Psychology*, Vol. 69, No. 1, 1984; Allison R. Butts and Kelly M. Smith, "Application and Interview Features Used to Assess Applicant Qualifications for Residency Training," *Hosp Pharm*, 50(2), 2015.

¹⁵ <https://afghan evac.org/asylum-interview-rule>

¹⁶ <https://www.pewresearch.org/short-reads/2026/08/12/second-trump-administration-has-ended-temporary-protected-status-for-most-immigrants-who-had-it/>

Nevertheless, many formerly TPS-designated countries remain strikingly dangerous,¹⁷ particularly for people who have lived in the United States for years, or even decades. In turn, many former TPS recipients are now reasonably seeking affirmative asylum declarations.¹⁸ The affected population is, therefore, far greater than the Department estimates using historical asylum records.¹⁹

The natural expectation of the Rule is that a greater proportion of affirmative asylum cases will be transferred to EOIR than was the case prior to its implementation; indeed, the Department all but explicitly confirms that this shift is intentional.²⁰ The Department purports that proceedings before EOIR will grant a similar opportunity for asylum seekers to describe extenuating circumstances or complicating factors that prove difficult to outline in the written application. The two sites are not administratively fungible from the perspective of asylum seekers, however. While asylum officer-led interviews are conducted as neutral factfinding missions, which present opportunities for asylum-seekers to explain and bolster their cases prior to an initial determination by the asylum officer, EOIR proceedings are procedurally adversarial, and will follow asylum seekers having already received non-grants from their respective asylum officers. Furthermore, given that EOIR proceedings are often far swifter than traditional one-to-three-hour asylum officer interviews, those proceedings are unlikely to grant asylum seekers the same depth of opportunity to outline their cases.²¹ The predicted consequence of these changes is a far greater rate of asylum denial than the Department imagines in the Regulatory Impact Analysis, suggesting that the Rule was not as carefully considered as administratively required, and as such, should be rescinded.²²

4. Regulatory Impact Analysis Concerns

At several junctures, the Department contends that the Rule is necessary in view of public safety threats, chiefly from claimed risks of crime and terroristic activity.²³ However, the Department offers no compelling qualitative or quantitative information to support the extent of those risks. Repeated studies have demonstrated that the rate of criminal activity by immigrant groups in the United States is lower than that of native-born Americans, belying the urgency of public safety

¹⁷ “Attorney General James Defends Temporary Protected Status for Haitian and Venezuelan Immigrants.” <https://ag.ny.gov/press-release/2025/attorney-general-james-defends-temporary-protected-status-haitian-and-venezuelan>; Fabiana Paolini, “The Legal and Humanitarian Implications of Ending Temporary Protected Status for Venezuelan and Haitian Migrants.” American University. Journal contribution, 2025.

<https://doi.org/10.57912/28836557>

¹⁸ <https://www.cnn.com/2026/06/26/politics/supreme-court-temporary-protected-status-haitians>

¹⁹ “Affirmative Asylum Referrals Without Interview,” *Federal Register*, Vol. 91, No. 143, 47103. (“IFR”)

²⁰ IFR 47103-4; 47107.

²¹ Indeed, this disparity is only likely to grow as the regularity of so-called “Mega Masters” proceedings continues to rise. <https://www.npr.org/2026/05/26/nx-s1-5830474/trump-immigration-courts-mega-masters>

²² IFR 47119.

²³ E.g. IFR 47114; IFR 47124.

concerns. Likewise, many asylum-seekers have histories working alongside the U.S. military against terroristic threats, yet these selfsame allies would now be subjected to more antagonistic treatment of their asylum claims under unsupported allegations of terroristic threats.²⁴ Courts have repeatedly determined that arbitrary claims of national security are insufficient to outweigh reliance interests in regulatory rulemaking.²⁵

The unsubstantiated claims elevated in the Rule raise meaningful concerns that the Department has not adequately assessed the balance of factors at play. Notably, the Department's claims that these proposals represent the only meaningful avenue by which the backlog in affirmative asylum cases may be reduced is somewhat belied by the budgetary requests of the Administration at large, which have not prioritized funding for USCIS or immigration caseworkers,²⁶ though it has repeatedly raised budget levels for detention and deportation,²⁷ suggesting that the latter, rather than the former, may be the primary valence through which the Rule should be read. Additionally, it seems that the Department did not seriously consider any alternatives to the proposal that would facilitate its stated interest in expediting asylum determinations in cases involving substantiated public safety or national security concerns, in lieu of the course it settled on.²⁸ As such, the Rule must be rescinded.

Hispanic Federation also has real concerns with the Department's argument that an online public notice encouraging affirmative asylum applicants to provide all relevant information in their applications would be at all equivalent to a dedicated, personal interview of up to three hours. In many cases, an applicant may not fully understand which information is most essential to proving their asylum claim, with details that are innocuous to them instead proving essential from the perspective of the adjudicating asylum officer. Producing documentary versions of case history and personal experience that would naturally emerge in an interview is an onerous process, all the more so for those asylum seekers with limited English language proficiency. Consequently, there emerge only two plausible outcomes: either a greater number of affirmative asylum applicants will have their applications rejected because they were unable to effectively present all salient information to asylum officers in the written application, or asylum seekers will be forced to spend considerably more time completing paperwork, in potential contravention to the Department's bureaucratic analysis. Either outcome is sufficient for Hispanic Federation to urge the rescission of the Rule.

²⁴ Including potentially some of those directly or indirectly engaged through Operation Allies Welcome, <https://www.dhs.gov/archive/operation-allies-welcome>.

²⁵ Laura K. Donohue, "The National Security Administrative State," *Stanford Law Review*, Vol. 78, 2026.

²⁶ DHS Budget Request Analysis: FY2027, Congressional Research Service, *Reports*: R48979, 2026.

²⁷ <https://www.whitehouse.gov/wp-content/uploads/2026/04/fiscal-year-2027-topline-fact-sheet.pdf>

²⁸ IFR 47125-6.

In turn, the Rule would also impose meaningful new burdens on small entities nonprofits that support affirmative asylum seekers' efforts to understand and navigate the asylum process. Responding to changes in a bureaucratic process that had stood in its previous form for decades is, alone, a substantial administrative burden on small nonprofits that the Department has failed to consider. By the same token, the elevated preparatory burden that the Department places on affirmative asylum applicants will require nonprofits which serve asylum seekers to dedicate considerably more resources to any individual case. Consequently, they will be left with fewer resources to pursue parallel programming aims, and likely prove less effective at facilitating the asylum program as envisioned by Congress.

Immigrant and mixed-status households fuel a disproportionate rate of small business activity.²⁹ In turn, these households are among the most likely to be implicated in the proposed Rulemaking. By the Department's admission, compliance with the expanded identity verification and income requirements under the Rule would impose increased temporal and fiscal costs on affected families. Small business owners routinely rely on personal finances and capitalization sources for their operations,³⁰ and their work hours and personal hours are often fungible, with ratios shifting according to business needs.³¹ These business disruptions would prove deleterious to local economies, which are highly responsive to downturns in small business.³² The Department does not include a meaningful consideration of downstream effects to small business entities from the Rule, which could prove significant to stakeholder assessments of its impacts.

5. Familial Impact Analysis

The Department erroneously claims that the Rule will have no significant impact on families within the scope of its legal obligation to ensure that the integrity of the family is indemnified from regulatory rulemaking.³³ That claim is extraordinary in view of the full size of the affected population, upwards of hundreds of thousands of affirmative asylum applications who, by definition, are already located in the United States, as well as the number of former TPS recipients who may similarly choose to seek affirmative asylum. Many of these individuals will, of course, have families, including many comprised partly of U.S. citizens. In turn, the Rule will

²⁹ <https://news.mit.edu/2022/study-immigrants-more-likely-start-firms-create-jobs-0509> (Accessed 8/21/26)

³⁰ John Moon, "Small Business Finance and Personal Assets," *Community Investments*, Vol 21, Iss. 3, Winter 2009/2010.

³¹ Peter Michael McNamara, "An exploration of the time-management behaviours of small-business owner-managers," PhD Diss.: University of Wollongong, Syndey Business School; June, 2016.

³² Baum-Snow, Gendron-Carrier and Pavan for instance find distinct, significant relations between business quality and neighboring commercial activity at the local scale of 500m. Nathaniel Baum-Snow, Nicolas Gendron-Carrier, and Ronni Pavan, "Local Productivity Spillovers," *American Economic Review*, vol. 114, no. 4, April 2024.

³³ IFR 47126-7.

necessarily impact the cohesion, relations, and earnings of those families, which, as the Department notes, number upwards hundreds of thousands per year.

These are not minor consequences either; they will, in fact, inevitably manifest in family separation, as individuals whose asylum claims are unduly dismissed under the newly adversarial process are in turn deported, and are forced to leave behind spouses, children, or other loved ones. Family separation of the sort that these modifications to asylum policies portend can lead to or exacerbate attachment-security disorders.³⁴ These conditions are causally linked to negative familial outcomes of precisely the type that Sec. 654 is intended to prevent, notwithstanding the direct harm on these mixed-status families themselves.³⁵ By expanding policies that directly undermine the strength of familial relations, including that between parent-and-child, the Rule would assuredly warrant a greater family impact analysis than the Department accords it.

Deleterious consequences of family separation and hostile immigration proceedings extend to academic outcomes as well.³⁶ Past studies have shown that detention and deportation of a parent register as traumatic events for children,³⁷ and even the stress of navigating such proceedings can manifest as traumatically stressful for children.³⁸ Research has suggested that everything from scores in mathematics to reading are negatively impacted by such traumas,³⁹ as well as predictive indicators of soft skills.⁴⁰ Both duration of detention and extent of traumatic exposure are implicated in these consequences, and each would therefore likely be exacerbated by the Rule.⁴¹ Reduced educational outcomes are connected with lowered educational attainment,⁴² which in turn proscribes both economic opportunity and social outcomes.⁴³ Divorce rates, for instance, are inversely correlated with educational attainment, illustrating the potential ramifications of a policy that would unjustifiably expose a greater array of families to such conditions, and that

³⁴ See: Teicher; Song; Ojeda; Gindling.

³⁵ *Supra*, especially 21-24.

³⁶ I.e. T.H. Gindling and Sara Z. Poggio, “Family Separation and Reunification as a Factor in the Educational Success of Immigrant Children,” Maryland Institute for Policy Analysis & Research, 2008.

³⁷ Rojas-Flores et al., “Trauma and Psychological Distress in Latino Citizen Children Following Parental Detention and Deportation”; Allen et al., “The Children Left Behind: The Impact of Parental Deportation on Mental Health,” *Journal of Child and Family Studies*, Vol. 24, 2013.

³⁸ Ramos-Sánchez and Llamas, “Immigration Policy and Latinx/é Children from Mixed-Status Families,” *Children*, Vol. 11, Iss. 11, 2024.

³⁹ Yao Lu, Qian He, and Jeanne Brooks-Gunn, “Diverse Experience of Immigrant Children: How Do Separation and Reunification Shape Their Development?” in *Child Dev*, January 2021. Grindling and Poggio are again also thorough and instructive.

⁴⁰ Mattingly, *Unseen Costs*.

⁴¹ Robjant, Katy et al. “Mental health implications of detaining asylum seekers: systematic review.” *The British journal of psychiatry : the journal of mental science* vol. 194,4 (2009): 306-12. doi:10.1192/bjp.bp.108.053223

⁴² Magnuson, K., Duncan, G. J., Lee, K. T. H., & Metzger, M. W. (2016). Early School Adjustment and Educational Attainment. *American Educational Research Journal*, 53(4), 1198-1228.

⁴³ Research on this point is wide and multifaceted, but this report from the Education Department outlines many salient points: <https://nces.ed.gov/pubs97/web/97939.asp> (accessed 8/20/26.)

these impacts could percolate through multiple generations.⁴⁴ Moreover, depression or anxiety in either child or guardian can directly decrease family stability, highlighting clear familial impacts.⁴⁵ As such, Hispanic Federation strongly urges the full rescission of the Rule by virtue of these egregious oversights by the Department into the likely familial impacts of its implementation.

Policies such as these have, historically, contributed to direct out-of-pocket costs for immigrant families in the form of both legal fees.⁴⁶ Adults and children alike experience acute distress, contributing to increased incidence of mental health challenges, potentially worsening attachment stressors.⁴⁷ Consequently, the increased incidence of mental health conditions contributes to elevated health care costs.⁴⁸ The extant scholarship has persistently shown that financial costs, particularly medical debt,⁴⁹ are correlated to increased stress.⁵⁰ Such aggravated stressors themselves warrant heightened regulatory scrutiny in light of widening scholarship on the epigenetic consequences of persistent stress, including decreased life expectancy.⁵¹ Any one of these anticipatable impacts would justify skepticism to the Rule, but taken together, Hispanic Federation can only ardently urge the Department to withdraw it in its entirety.

⁴⁴ Brand, Jennie E et al. "Why Does Parental Divorce Lower Children's Educational Attainment? A Causal Mediation Analysis." *Sociological science* vol. 6 (2019): 264-292. doi:10.15195/v6.a11

⁴⁵ Ronald C. Kessler, Ellen E. Walters, and Melinda S. Forthofer, "The Social Consequences of Psychiatric Disorders, III: Probability of Marital Stability," *Am J Psychiatry* 1998; 155:1092-1096; Susan H. Busch and Colleen L. Barry, "Mental Health Disorders In Childhood: Assessing The Burden On Families," *Health Affairs*, Vol. 26, No. 4, 2007.

⁴⁶ Wichelt, Natalie et al. "Legal Relief for Children in Immigrant Families: A Mixed-Methods Study." *International journal of environmental research and public health* vol. 19,7 4373. 5 Apr. 2022, doi:10.3390/ijerph19074373.

⁴⁷ In addition to the literature cited above, Victoria Ojeda et al. also have a significant investigation of these effects: Ojeda, Victoria D et al. "Deported Men's and Father's Perspective: The Impacts of Family Separation on Children and Families in the U.S." *Frontiers in psychiatry* vol. 11 148. 17 Mar. 2020, doi:10.3389/fpsyt.2020.00148

⁴⁸ For instance: Tkacz and Brady, "Increasing Rate of Diagnosed Childhood Mental Illness in the United States," *Public Health in Practice*, 2021.

⁴⁹ Khan, Muhammad Ali, Ziauddin, Ayesha Zummar, and Ayesha Malik. 2024. "The Psychological Impact of Debt: Stress and Its Connection to Mental Health Disorders". *Review of Education, Administration & Law* 7 (4):319-33. <https://doi.org/10.47067/real.v7i4.384>.

⁵⁰ Fitch C, Hamilton S, Bassett P, Davey R (2011), "The relationship between personal debt and mental health: a systematic review". *Mental Health Review Journal*, Vol. 16 No. 4 pp. 153-166, doi: <https://doi.org/10.1108/13619321111202313>; Elizabeth Sweet, Arijit Nandi, Emma K. Adam, Thomas W. McDade, "The high price of debt: Household financial debt and its impact on mental and physical health," *Social Science & Medicine*, Volume 91, 2013, Pages 94-100, ISSN 0277-9536, <https://doi.org/10.1016/j.socscimed.2013.05.009>.

⁵¹ Indeed, Amy Guillaumet-Adkins and Yania Yañez highlight pathways by which such epigenetic stressors may be understood as causative of the underlying mechanics of aging themselves. Guillaumet-Adkins, Amy, Yañez, Yania, Peris-Díaz, Manuel D., Calabria, Ines, Palanca-Ballester, Cora, Sandoval, Juan, *Epigenetics and Oxidative Stress in Aging, Oxidative Medicine and Cellular Longevity*, 2017, 9175806, 8 pages, 2017. <https://doi.org/10.1155/2017/9175806>

6. Hispanic Federation Serving Immigration Initiatives

Hispanic Federation and its network have been serving immigrants and particularly asylum seekers for decades through programs coordinating legal aid, representation, and culturally and linguistically competent support upon arrival. As an umbrella organization, Hispanic Federation has a proven track record of designing and launching national, state-wide, and locally focused immigration initiatives, including direct legal, case management, and navigation services to vulnerable migrants and asylum seekers. Programs include:

- *Caminos de Esperanza*: A legal support program serving immigrant communities across the country in conjunction with 12 organizations. HF has provided more than 4,000 legal screenings, and direct representation for more than 1,000 asylum seekers. This program speaks not only to HF's investment in the asylum-seeking process but also the organization's qualification to offer feedback on the IFR.
- *Welcoming New York*: A New York Statewide initiative providing legal screenings for asylum seekers, pro se assistance for asylum applications, EADs, and Temporary Protected Status applications. This work is conducted in conjunction with both external attorneys and Department of Justice representatives. HF has served over 18,000 immigrants through 33 partner organizations through this program's universal service model. HF's leadership in this program highlights our experience cooperating with federal officials on sensitive agenda, including on asylum.
- *Florida's HELLO Program*: Through Florida's HELLO (Help, Education, Legal Assistance, Listening, Outreach) program, HF conducts monthly workshops with the Orlando Center For Justice to provide immigrant community members, including newly arrived migrants, with culturally and linguistically competent information about the immigration system in America. This includes free legal guidance with trained lawyers and staff to help participants navigate this immigration system. HF's experience serving the immigrant community in Florida is particularly relevant to our assessment of the proposed maritime expansion of the Circumvention of Legal Pathways rule.

7. Conclusion

Hispanic Federation's analysis of the Rule clarifies several alarming gaps in the Department's Regulatory Impact Analysis. The absence of any meaningful impact consideration on families is a notable flaw in light of the predictable increase in affirmative asylum application denials that will stem from the elimination of a right to interviews in conjunction with the surfeit of scholarship demonstrating just how harmful such outcomes are along multiple axes. Likewise,

the Department's neglect of small entities impacts and elision of the Rule's interactions with other, salient contemporary policy changes further supports the belief that the Rule will prove far more impactful than the Department considers. In view of both these procedural shortfalls and the clear negative repercussions of the Rule, Hispanic Federation urges its rescission in full.

Sincerely,

Julietta Lopez
Vice President for Federal Advocacy and Network Mobilization
Hispanic Federation