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June 30, 2022

Melissa Lin
Branch Chief, Policy Development and Coordination 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: Comment in Response to the DHS Temporary Final Rule (TFR) Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Renewal Applicants; CIS NO. 2714-22; DHS Docket No. USCIS-2022-0002; RIN 1615-AC78.

Dear Ms. Lin,

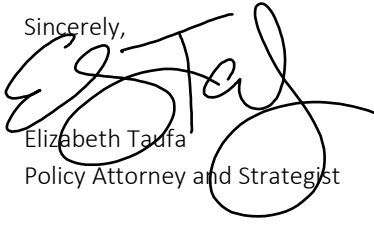
The Immigrant Legal Resource Center (ILRC) submits this comment in response to the Department of Homeland Security's (DHS) temporary final rule (TFR), entitled "Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Renewal Applicants," and published on May 4, 2022.

ILRC is a national non-profit organization that provides legal trainings, educational materials, and advocacy to advance immigrant rights. The ILRC's mission is to work with and educate immigrants, community organizations, and the legal sector to continue to build a democratic society that values diversity and the rights of all people. Since its inception in 1979, the ILRC has provided technical assistance on hundreds of thousands of immigration law issues, trained thousands of advocates and pro bono attorneys annually on immigration law, distributed thousands of practitioner guides, provided expertise to immigrant-led advocacy efforts across the country, and supported hundreds of immigration legal non-profit organizations in building their capacity.

We write to commend the agency on the automatic extension of validity periods for expiring Employment Authorization Documents (EAD) from 180 days to 540 days. Given the severe backlogs that USCIS is experiencing and the long processing times for EAD renewals, this is a welcome change that will ensure that EAD renewal applicants are not unduly and unfairly punished for the agency's backlogs. Over the past few years, we have heard numerous reports of EAD renewal applicants losing jobs due to the expiration of their EAD even though a renewal had been timely filed. This measure will go a long way to ensuring that those with valid work authorization can maintain stability of employment while waiting for a renewal.

We commend the agency for taking steps to ensure the financial stability of the eligible-to-work population.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Taufa'. The signature is fluid and cursive, with a large loop at the end.

Elizabeth Taufa
Policy Attorney and Strategist