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Division of Humanitarian Affairs
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: U.S. Citizenship and Immigration Services Notice of Proposed Rulemaking, DHS Docket No. USCIS-2025-0370, Employment Authorization Reform for Asylum Applicants

To whom it may concern,

The Welcome With Dignity Campaign respectfully submits this comment requesting that the Department of Homeland Security (“DHS”) rescind its February 23, 2026 Notice of Proposed Rulemaking (“Proposed Rule”), which would severely restrict asylum applicants’ access to an Employment Authorization Document (“EAD” or “work permit”). *See Employment Authorization Reform for Asylum Applicants*, 91 Fed. Reg. 8616 (Feb. 23, 2026) (DHS Docket No. USCIS-2025-0370).

The [Welcome With Dignity Campaign](#) is committed to transforming the way the United States receives people forced to flee their homes to ensure they are treated humanely and fairly. The Campaign was formed in 2021, and it brings together 130 organizations working across the country to provide legal services, humanitarian assistance, advocacy, housing, and other support to immigrants and people seeking asylum. DHS’s Proposed Rule would inflict immense harm on the communities our members serve and represent.

People seeking safety in the United States want to support their families – to build self-sufficient, stable, and safe lives as they navigate the asylum process. If implemented, the Proposed Rule would leave people seeking asylum without options to support themselves and their loved ones. Vulnerable families, children, and adults would face heightened risks of hunger, homelessness, and potentially abusive living situations, as well as coercive employment practices and trafficking.

In addition to pushing people seeking asylum into financially precarious and potentially dangerous situations, the Proposed Rule would cause reverberating damage to communities across the country. Approximately [2.3 million adults](#) in the United States are already legally working while completing the asylum process, enriching their communities and local economies with their talents and skills. The Proposed Rule would not only upend the lives of those seeking asylum, but also create hardship for their families, their employers, and the communities that depend on their contributions.

The Welcome With Dignity Campaign has collected testimonials from directly affected community members—including people seeking asylum, those who have been through the asylum process, and their loved ones—attesting to the profound harm that the Proposed Rule would inflict on people seeking safety and their families. Their stories and perspectives, in their own words, can be read below.

Testimonials from Asylum Seekers and Impacted Community Members

Steven, Asylum Seeker

“Access to work authorization is essential for dignity, stability, and successful integration for people seeking asylum in the United States. The ability to work allows individuals to meet their basic needs, support themselves, and contribute meaningfully to their communities while navigating the asylum process.

From both lived experience and professional engagement with asylum seekers, I have seen how access to employment can significantly shape outcomes. When individuals are able to work, they are better positioned to secure housing, maintain their health, and move forward with a sense of purpose and independence. Without this access, people are left in prolonged uncertainty, increasing vulnerability and making an already difficult process even more challenging.

Policies that delay or restrict work authorization do not just impact individuals, they create broader instability for families and communities. Ensuring timely access to work permits is a practical and humane approach that supports self-sufficiency and reduces unnecessary hardship.

Maintaining access to work authorization is critical to preserving dignity, stability, and opportunity for those seeking safety.”

H.R., Asylum Seeker

“For eight years as asylum seekers in the United States, the permission and ability to work was the only thing that allowed my family to live with dignity and provide for ourselves. My family and I arrived in the United States in 2016 fleeing political violence in Iran. My mother, a doctor, and my father, an engineer, were working blue-collar jobs, yet remained grateful to have work authorization so they could provide for my sister and me.

I also began working to help with household bills and save for college tuition, knowing I would not qualify for FAFSA or any other federal financial aid due to my status as an asylum seeker. Had I not been able to work throughout high school, I would not have been able to afford the tuition and living expenses I had spent those two years saving for. Furthermore, for my parents, being able to work was their primary pathway to integrating into American society — from learning the customs and culture to now speaking English fluently.

There is simply no way for asylum seekers to live a normal life without the ability to work. Employment is not a privilege for them but rather a necessity. It is what allowed families like

mine to pay rent, put food on the table, and participate in everyday American life. Beyond the individual, work authorization is also the first and most critical step toward meaningful contribution to American society and the broader economy.

Asylum seekers who work pay taxes, fill labor shortages, and spend their earnings in local communities. Revoking work permits for asylum seekers would not only devastate the lives of hundreds of thousands of people who have done everything right — it would also inflict long-term damage on the American economy by removing a productive, motivated, and resilient workforce. These are not people looking for handouts; they are people who simply want the chance to earn their place and give back to the country that gave them refuge.”

Teddy, Asylum Seeker

“I am an asylum seeker currently living in the United States.

Access to work authorization is not just about income, it is about dignity, stability, and the ability to rebuild a life after displacement.

Without the ability to work, many of us are left in prolonged uncertainty, unable to support ourselves or contribute to the communities we now call home.

Restricting access to work permits does not create order, it creates deeper vulnerability. People seeking safety should not be forced into survival without the means to live with dignity.”

Irma, Asylum Seeker

“My name is Irma. I am a part of this great, vulnerable community and I am currently in the process of seeking asylum. Today I find myself in a state of uncertainty, in limbo, as my hearings have been postponed time and time again. I live in fear that at any moment I will be asked to leave the country without having had the opportunity to present my case.

I am grateful that I still have my work permit, as it allows me to cover my family’s basic needs, both for those who are here with me and for those who, for many reasons, I have not yet been able to bring.

Being able to have the opportunity to work gives us a small relief. We do not want to depend on the government or be a burden. The only thing we are looking for is a decent job that lets us offer a better quality of life to our loved ones, in a safe environment since in our countries it was denied to us.

For that reason, we have the right to remain in this country while our cases are resolved, with access to work permits. We came to contribute, and to build a better future for our families.”

P.Z., Asylum Seeker

“My partner and I had to flee state persecution. Upon arriving in the United States we were lucky enough to receive scholarships from the university we attended, so some of our financial struggles were postponed. However, when the program came to an end, we had to face a reality that the majority of asylum seekers face: having to leave everything behind in hopes of protection while ending up in some sort of wage slavery system. None of us have a say in what happens to us. Yet we are subjected to financial struggles resulting from not being able to legally work and sustain our lives. There are no programs supporting us.

After fleeing torture, abuse, death threats, or climate displacement, we end up in a loop where we have to go into debt and then pay insane amounts of interest on that. None of us wants to sit quietly while our lives are getting even worse. We become nothing more than trapped individuals with nowhere to go being forced to live in debt, work minimum wage, and pay enormous amounts in taxes that do not improve our lives in any shape or form, all while being silenced and prevented from talking about our struggles.

It is crucial to allow asylum seekers to work upon arrival. The current system and its challenges are presented to the public as a way to discourage people facing persecution from seeking safety in the United States. However, it has become a neo-colonial form of wage slavery where people are trapped upon their arrival and forced into financial debt and insecurity, not knowing what the next day may bring. Beginning last December, all asylum applications were halted for four consecutive months while the government continued to collect an annual asylum fee, which was justified as a way to speed up the process of clearing asylum applications. We are facing a system that entraps individuals, forcing them to work with fewer rights (if they're allowed to work), unable to see the families they left behind, and living in a constant state of fear and uncertainty. This is exploitation, knowing well that we will not be able to seek protection elsewhere.

Asylum seekers are not parasites. We contribute the best we can. Often we contribute the skills that forced us into exile. Being able to work in the United States has meant at least some sort of freedom.”

Anita, Former Refugee

“As someone connected to the asylum process, I know how important it is for people seeking safety in the United States to be able to work while they wait for their cases to be processed. Being able to work is not just about income. It is about dignity, stability, and the ability to take care of basic needs like housing, food, and transportation.

If people are denied work authorization for long periods of time, it creates unnecessary hardship and deep stress for individuals and families who are already going through a very difficult and uncertain process. It makes it harder for people to rebuild their lives, contribute to their communities, and maintain hope for the future.

Allowing asylum seekers to work helps them become more independent and better prepared for long-term integration into society. Removing or delaying this right would only increase suffering and dependence.

I strongly believe that people seeking asylum should have timely access to work permits so they can support themselves and live with dignity while their cases are being reviewed.”

Claudia Rojas, Temporary Protected Status (TPS) Holder

“I have a work permit through TPS. The work permit has meant that I can provide for myself and contribute to the community. Work permits allow refugees and immigrants to participate in various industries of work, including medical, educational, and transportation, where there is a shortage of workers. Work permits allow economic independence and contribution, which builds stability in cities and small towns across the U.S.”

Anonymous, Asylum Seeker

“I believe it is important for asylum seekers to have the opportunity to work for several reasons. One of them is, following the trauma caused by persecution, war, etc., working helps them to uphold a sense of dignity and self-sufficiency. [The ability to work] also assists them with social integration and connecting with new people without fear, while preventing exploitation in the workforce.

[Having the opportunity to work] also signifies that I am able to lead a stable, integrated, safe, and secure life in the United States—knowing that I can support myself financially, through my own merits and talents, or through different services I can provide. This can also help me connect and build all kinds of relationships.”