



July 15, 2020

Submitted via www.regulations.gov

Lauren Alder Reid, Assistant Director
Office of Policy
Executive Office for Immigration Review
5107 Leesburg Pike, Suite 1800,
Falls Church, VA 22041

Re: **DHS/EOIR; RIN 1125-AA94; EOIR Docket No. 18-0002**

Dear Ms. Alder Reid:

The undersigned institutional investors, members of the Interfaith Center on Corporate Responsibility (ICCR), a coalition of faith and values driven institutional investors representing \$500 billion in assets under management, are writing to express our concerns about the proposed rule on “Procedures for Asylum and Withholding of Removal; Credible Fear and Reasonable Fear Review” (heretofore Rule), issued by the Homeland Security Department and the Executive Office for Immigration Review and published in the Federal Register on June 15, 2020. As investors, we believe that just immigration policies are critical to a stable and prosperous long-term business environment and our organization has a record of corporate engagements promoting these policies.

The ability to seek asylum from persecution is a core human right enshrined in international and U.S. law. The proposed Rule would effectively eliminate protection for people fleeing violence from non-state actors, counter to current U.S. law. It will eviscerate due process and fairness for asylum seekers, permitting judges to deny asylum for purely procedural reasons and without a hearing, which would particularly prejudice applicants without legal representation.

This Rule would place harsh and unnecessary restrictions on asylum applicants who traveled through other countries to reach the U.S. and those who have lived without authorization in the U.S. for more than one year. Additionally, it proposes to exclude survivors of gender-based persecution, domestic abuse and gang violence from the generally accepted “grounds for asylum.”

Further, a policy change of this magnitude should have a meaningful timeframe for public review and comment, yet we note that instead of the typical 60-day comment period, the administration has chosen to abbreviate the comment period to 30 days.

Immigrants are essential contributors to American communities and to the American economy, we believe the new Rule will put both at risk. Numerous studies have established the economic benefits of taking in refugees. In a letter to President Trump, 80 CEOs and business leaders [warned](#) that “overly restrictive immigration policies will likely cause billions of dollars in economic loss to our education and tourist industries and weakened foreign investment.” A study by the New American Economy highlights that immigrants are significant contributors to the U.S. economy--“immigration creates an economic

opportunity—creating jobs, filling workforce gaps, and helping communities thrive.” The 3.2 million immigrants who run their own businesses are also responsible for employing 8 million American workers and generating \$1.3 trillion in total sales in 2017.

In summary, the signatories to this letter strongly oppose the proposed Rule and recommend that it be withdrawn, as it creates additional hardship for asylum seekers and vulnerable individuals.

Signed:

Interfaith Center on Corporate Responsibility

Adrian Dominican Sisters, Portfolio Advisory Board

Candide Group

Congregation of Holy Cross, Moreau Province

Congregation of Sisters of St. Agnes

Congregation of St. Joseph

CorpGov.net

Daughters of Charity, Province of St. Louis

Domini Impact Investments LLC

Dominican Sisters ~ Grand Rapids (MI)

Everence and the Praxis Mutual Funds

Felician Sisters

Franciscan Friars: St. John the Baptist Province

Franciscan Sisters of Allegany NY

Franciscan Sisters of Perpetual Adoration

Friends Fiduciary Corporation

Greenvest

Hansen's Advisory Services, Inc.

Harrington Investments, Inc.

Impact Investors

Investor Advocates for Social Justice

Maryknoll Fathers and Brothers

Maryknoll Sisters

Mercy Investment Services, Inc.

Miller/Howard Investments, Inc.

Natural Investments

Nia Impact Capital
NorthStar Asset Management, Inc.
Northwest Coalition for Responsible Investment
Priests of the Sacred Heart, US Province
Principled Investing LLC
Province of St. Mary of the Capuchin Order
Region VI Coalition for Responsible Investment
Religious of the Sacred Heart of Mary, Western American Area
Reynders, McVeigh Capital Management, LLC
Congregational Leadership Team, Sisters of the Holy Names of Jesus and Mary
Ursuline Sisters of Mount Saint Joseph
School Sisters of Notre Dame, Central Pacific Province
SharePower Responsible Investing
Sisters of Charity of Leavenworth
Sisters of Charity of Nazareth
Sisters of Charity, Halifax
Sisters of Mary Reparatrix
Sisters of Notre Dame de Namur Base Communities
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
Sisters of St. Dominic of Blauvelt, New York
Sisters of St. Francis
Sisters of St. Francis of Philadelphia
Sisters of the Humility of Mary
Sisters of the Order of St. Dominic
Sisters of the Precious Blood
Sisters of the Presentation of the Blessed Virgin Mary, New Windsor, NY
Socially Responsible Investing Coalition
St. Pius Tenth Parish
St. Pius X Catholic Church
Sustainable Value Investors
Province of Saint Joseph of the Capuchin Order
Trinity Health

T'ruah: The Rabbinic Call for Human Rights

Unitarian Universalist Association

Ursuline Sisters

Ursuline Sister of Maple Mt., KY.

Ursuline Sisters of Mount Saint Joseph

Jeremiah O'Leary, Xaverian Brothers