Title

Comment Submitted by End Domestic Abuse Wisconsin

Comment Submitted by Al Otro Lado

Comment Submitted by Luisa Molina

Comment Submitted by United Stateless

Comment Submitted by Jesuit Refugee Service / USA

Comment Submitted by Hannah Sullivan

Comment Submitted by Anonymous

Comment Submitted by Public Counsel

Comment Submitted by Immigrant Defenders Law Center

Comment Submitted by Central West Justice Center

Comment Submitted by Amber Duke

Comment Submitted by Services, Immigrant Rights and Education Network (SIREN)

Comment Submitted by Rocky Mountain Immigrant Advocacy Network (RMIAN)

Comment Submitted by Children's Law Center of California

Comment Submitted by East Bay Community Law Center

Comment Submitted by Nina Rabin

Comment Submitted by Young Center for Immigrant Children's Rights

Duplicate Comment Submitted by Young Center for Immigrant Children's Rights

Duplicate Comment Submitted by Young Center for Immigrant Children's Rights

Comment Submitted by Immigrant Legal Defense

Comment Submitted by Lawyers For Children

Comment Submitted by Legal Counsel for Youth and Children

Comment Submitted by Randi Mandelbaum

Comment Submitted by The Door Legal Services Center

Comment Submitted by Children's Law Center of Massachusetts

Comment Submitted by Immigration Center for Women and Children

Comment Submitted by New York State Office for New Americans

Comment Submitted by Legal Aid Society of Cleveland

Comment Submitted by Graham Windham

Comment Submitted by Florida
Immigration Law & Justice Center

Comment Submitted by New Jersey
Consortium for Immigrant Children

Comment Submitted by Marissa Jennings

Comment Submitted by The Children's Partnership

Comment Submitted by End SIJS Backlog Coalition, a project of the

Comment Submitted by Immigrant
Legal Advocacy Project

Comment Submitted by The Law Office
of Derrick J. Hensley, PLLC

Comment Submitted by Ellen Bass

Comment Submitted by Children's Rights

Comment Submitted by Acacia Center for Justice

Comment Submitted by Center for the Study of Social Policy

Comment Submitted by CLEAR Clinic

Comment Submitted by Northwest
Immigrant Rights Project

Duplicate Comment Submitted by Ana De MeloFerreira

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Duplicate Comment Submitted by Ana De MeloFerreira

Comment Submitted by Sarah Baranik

1. The filing categories for Labor Investigation-Based, Special Immigrant Juvenile, and Statelessness should n
First, when immigrant survivors have deferred action, it makes them more likely to escape from domestic vio
abusers, such as economic dependence on abusers and fear of retaliation. Without legal options for employn
may be even greater for undocumented immigrant survivors, who fear seeking protection from law enforcen
survivors with deportation. Simultaneously, in our experience, the safety of their children is the number one
their children through filing for SIJS.
Congress established SIJS to protect vulnerable children from deportation. Our office has applied for and obt
the other survivor parent. SIJS can help families feel safe because it offers protection to these vulnerable chil
Yet, due to extreme visa backlogs, many SIJS recipients have languished, waiting for a visa; these children rem
visa. Under the deferred action policy, those with approved SIJS petitions who are waiting for a visa are prote
policy for SIJS holders using form GF-325A.
Second, in our office, we frequently encounter survivors who seek additional legal services because of deferr
that lead them to applications for deferred action. For example, immigrants – especially immigrant survivors
Critically, these individuals who obtain deferred action through Labor Agency investigation or SIJS are often a
ability to remain in the U.S. and ultimately pursue citizenship. These survivors oftentimes only discover and p
ultimately, the knowledge that they may be eligible for further relief.
For years, the U.S. Department of Homeland Security has proclaimed the importance of ensuring that workpl
employment authorization supports workplace investigation and enforcement of critical protections for all U.
Investigation cases uncover human trafficking operations and victims of human trafficking.
Third, with long processing times for U visa, T visa, and VAWA self-petition applicants, survivors can be left wa
on Labor Investigation, SIJS, or statelessness while awaiting the humanitarian immigration application proces

2. The ability to request an Employment Authorization Document and receive a Social Security card upon bein
Deferred action opens the door to economic independence – through enabling recipients to receive an emplo
deportation is a lesser risk. Removing the sections of form GF-325A that allow an individual to request an EAD
benefits of deferred action and prevent survivors from gaining necessary tools for their safety. Once immigra
empowerment.

Al Otro Lado writes to express opposition to OMB Control Number 1615-0008, USCISâ€™s proposed revision
Alert that USCIS issued on June 6, 2025, which eradicates the SIJS Deferred Action Policy. Because the propose
them collectively as â€œthe SIJS policy changes.â€ These changes will directly and severely harm children and
authorization for SIJS-approved youth, putting them in danger of labor exploitation and deportation.

Al Otro Lado is a binational nonprofit organization providing holistic legal and humanitarian support to refug
the complex needs of these communities. In California, Al Otro Lado provides direct legal representation to u
support to individuals and families navigating the asylum process, while connecting them to essential social s

One of our clients, a young girl turning 8 this year, was granted Special Immigrant Juvenile Status and receive
go far beyond employment. Most importantly, it has given her a valid form of government-issued identificatio

This ID has brought an enormous measure of relief to her mother, who has been increasingly anxious about
granted deferred action and is not a priority for removal. This small but powerful document has helped the fa

The EAD has also opened doors to other essential services, such as the ability to apply for a Social Security nu
been much more than a work permit, itâ€™s an anchor of stability in their life that otherwise feels uncertain a

1. Unnecessary Information Requests:
A major concern I have encountered is the overly broad or redundant information requests that do not seem
SIJS (Biographic Information for Deferred Action) and I-765s (Application for Employment Authorization) repe
and an increased burden on applicants.

I recommend that USCIS streamline the information collection process to ensure that only necessary and rele

2. Delays in Processing and Response Times:
The delays in processing applications remain another significant challenge. Applicants often experience exter
In addition to reviewing information collection practices, I encourage USCIS to explore technological solution
also help set realistic expectations for applicants.

3. Allowing Concurrent Filing of Forms:
One key improvement that could significantly reduce delays and streamline the process is the ability for appli
they await responses from USCIS before proceeding with the next steps.
Allowing applicants to file related forms concurrently—such as Form I-360 (Petition for Amerasian, Widow(er)
process but also reduce the waiting period for individuals whose applications are closely linked.
This flexibility would ensure that individuals are not held up unnecessarily due to procedural waiting times ar

4. Recommendations:
•
Simplify Information Requests: Revise forms to ensure they request only the most relevant information neces
•
Increase Efficiency: Implement automated responses or use digital tools to expedite processing and minimize
•
Allow Concurrent Filing: Enable applicants to file related forms at the same time to reduce unnecessary waitin
•
Clearer Communication: Provide applicants with more transparent timelines or automatic status updates so t

prevent them from asserting their rights when faced with illegal practices such as wage theft, occupational sa
their employer.5 Immigrant workers also experience 300 more workplace fatalities and 61,000 more workpla
6 Undocumented workers experience twice as many minimum wage violations as U.S. citizens in the same jo
and sustained by predatory employers who weaponize threats of immigration enforcement.8 Immigrants' co
result, many immigrant workers fear reporting unsafe conditions to supervisors or labor agencies and becom

Prior DHS Guidance on Labor-Based Deferred Action

The Supreme Court recently acknowledged the "deeply rooted history of enforcement discretion in American
policy that supports workers in exercising their labor rights by mitigating the risk of immigration enforcemen
support the labor agencies' investigations. The Agency has incrementally issued guidance to minimize the co
In June 2011, ICE Director John Morton issued guidance directing officers to exercise prosecutorial discretion
requiring ICE to consider DOL requests for deferred action for witnesses in active labor investigations.12 The
investigation for labor violations, subject to narrow exceptions.
13 In 2016, ICE, the DOL, the National Labor Relations Board (NLRB), and the Equal Employment Opportunity
action for witnesses.14 The addendum further extended the deconfliction process to workplaces under inves
directing ICE agents to look for indications that the enforcement was being used by employers to suppress th
On October 12th, 2021, the Secretary of the Department of Homeland Security Alejandro N.Mayorkas issued
prosecutorialdiscretion authority.17 Secretary Mayorkas followed the tradition of former leaders of DHS andt
Memoannounced an end to DHS' focus on mass worksite immigration enforcement and directed theAgency t
safety, and otherlaws and standards."19 The memorandum also directed DHS to consider exercising prosecu
streamlined DALE application process, one component of which is Form G-325A, which the Agency now seeks
"Process Enhancements for Supporting Labor Enforcement Investigation" reaffirmed the Agency's commitme
intent to support agencies in enforcing labor and employment laws and hold abusive employers accountable
action procedures for DHS and labor agencies across the country.
The Agency's 2023 announcement created a centralized process that allowed adjudicators to more efficiently
Interest") from local, state, and federal labor agencies.25 The new guidelines also clarified that "Labor-Investi
additional two-years with the support of a labor or employment agency.26 DHS subsequently released furthe
a filing type in Part 2: Section 2 of Form G-325A.27 These steps helped clarify the process and make it more a
labor-based option, "LIB-DA," and allowed USCIS to quickly determine the type of deferred action requested.
These procedural enhancements allowed USCIS to more efficiently adjudicate DALE requests, and provided c
These process enhancements for DALE applications helped to effectively operationalize the multi-agency poli
agencies by simplifying the DALE adjudication process, clearly identifying the type of deferred action sought,
29 The new process ensured that vulnerable workers could receive protection as quickly as possible and part
workers, and participate in labor investigations.

USCIS' Proposed Revisions to Form G-325A

The Agency's proposed revisions eliminate "Labor Investigation-Based (LIB-DA)" as a filing type for deferred a
"Statelessness" as filing types on page 3.31 The revisions delete "Part 3. Employment Authorization" on pages
4. Social Security Card" on page 4 which allowed recipients to obtain or reissue a Social Security card through
Although the Agency provided a 60-day comment period, the lack of clarity and consistency in the Agency's a
Register related to the proposed revision to Form G325-A on May 15th, 2025. The "Table of Changes" docume
"Instructions") provides updated instructions on how to complete the revised Form G-325A. 36 The informatio

The "Table of Changes" document revises Option G. on Page 3, Part 2, Deferred Action Request from "G. Gove
from the form, individuals involved in labor investigations can apply to Option D to obtain deferred action rel
appeared to be included in the previous version only to distinguish the two categories.

The "Instructions" document contains contradictory information. The document reflects many of the revision
However, the document fails to reflect the "Table of Changes" revision to Option G. The "Instructions" docum
individuals in active labor disputes are precluded from submitting deferred action requests using Option D. T

that time, hundreds of immigrant workers have come forward to assist the federal government in investigati unfair labor practices and received protection from removal and work authorization. As it stands now, these are no longer able to apply for DALE, but the lack of notice of the program's termination runs the risk that the may not be aware that DALE is no longer in effect. Those who do not have notice of the termination could stil for the program, which would expose them to an administration whose sole focus appears to be detaining ar deporting as many immigrants as possible. The lack of transparency and conflicting information available to public is unconscionable when a person's liberty is at stake, as is the case for workers who applied for DALE o course of the last two years. The notice and comment period for the proposed form is not sufficient to advise public of the intended status of the DALE program. This attempt by the administration to dictate drastic polic change via form updates is impermissible under the PRA.

USCIS Did Not Provide a Reason for the Form Changes, Yet They Will Cause Severe Harm to Those Who Rely o these Policies.

USCIS provided no reason for the changes to Form G-325A. Simultaneously, USCIS eliminated consideration o deferred action programs with no justification, stating only that it was publishing the proposed form changes comply with the Paperwork Reduction Act. Yet, the purpose of the Paperwork Reduction Act (PRA) is to reduce burden of filing paperwork on both the federal government and its constituents.6 Forms issued by the Gover are supposed to benefit, not burden the public.7 Despite this requirement, the revisions to Form G-325A, alon USCIS's stated decision to terminate deferred action for SIJS and statelessness, and implied termination of DA cause grave harm to the communities affected.

Deferred action has been a lifeline for stateless individuals who often have no other recourse or ability to obt permanent status simply by virtue of the fact that they are stateless. Individuals become stateless through ch in nationality laws, discrimination, and geopolitical upheavals. The assumptions of USCIS that stateless indivi are dangerous and require heightened scrutiny are not based on any evidence and are simply an exercise in prejudice. The removal of the ability to apply for deferred action on Form G-325A as well as the statelessness guidance in the USCIS Policy Manual removes the thin layer of protection that deferred action and adjudicato guidance provided to this vulnerable population. The 2023 guidance provided by the previous administration acknowledged the precarious nature of statelessness and the vital need for these individuals to access protec Deferred action for stateless individuals was a much-needed solution in recognition of a longstanding proble the two years since the statelessness deferred action policy was put in place, stateless individuals have acted reliance on previous USCIS policy, provided extensive personal information, and in some cases terminated immigration proceedings.

Similarly, DALE recipients have come forward to expose labor violations, to which immigrant workers are par vulnerable. DALE allowed these workers to obtain work authorization while also providing assistance to the government in stopping employers who violate labor laws. In implementing the program, DHS recognized th importance of deferred action to protect workers and that programs like DALE "increase[] the ability of labor employment agencies to more fully investigate worksite violations and support them in fulfilling their mission holding abusive employers accountable."8

SIJS youth have also come to rely on the benefits provided by deferred action and work authorization, allowin affected youth to more readily participate in civic life with their peers and thrive in the United States while the for permanent status. Young people receive grants of SIJS only after satisfying a set of "rigorous, congression defined eligibility criteria," including having been placed by a juvenile court in the custody or guardianship of residing caregiver and having received a determination from a state juvenile court that it is not in their best i to be returned to their country of origin. USCIS is abandoning these young people—who are eligible for perm immigration status--without any defensible justification. The Department of Homeland Security claims that "President Trump and Secretary Noem take their responsibility to protect children seriously and will continue safe from abuse, sexual exploitation, and trafficking."9 However, the Administration's actions do just the opp and leave young people with SIJS open to exploitation of all kinds.

These communities are similarly situated in their vulnerability and the removal of the critical lifeline of deferr action for these populations puts a target on their backs and decimates any safety or security they may have

Background on statelessness:
Stateless individuals, by definition, are not recognized as nationals by any State under the operation of its law
not recognize them, or due to political or religious persecution.

The importance of deferred action for stateless people:
The 2023 guidance adopted in the USCIS Policy Manual was a critical first step to protecting these individuals
case-by-case method, within existing legislative frameworks, to consider statelessness as a relevant factor in
this policy change to allow stateless individuals to apply for deferred action.
Crucially, deferred action does not provide affirmative legal status to anyone. It provides a discretionary, tem
acted in reliance on this policy. Stateless people acted in reliance by providing biometrics and extensive infor
termination of immigration proceedings so that they could pursue deferred action, because USCIS had exclus
Now, USCIS has amended Form G-325A by removing statelessness as a basis to pursue deferred action. Along
regulatory definition
of statelessness, no process to identify stateless individuals, and without avenues to temporary, discretionary
reliance on this policy to request termination of their immigration proceedings and apply for deferred action
The changes to remove these options from the G-325A form have already caused significant instability and co
no pathway to relief. Some will be detained at immense personal cost to them and their families, and at unne
United Stateless is also deeply concerned about the removal of deferred action for labor enforcement and Sp
noncitizen children in the United States, including children who are unaccompanied or trafficked and who are
U.S. while waiting for an immigrant visa in the lengthy SIJS backlog. Eliminating this option puts these vulnera
undermining labor protections for vulnerable workers.

Conclusion:
United Stateless urges USCIS to reconsider these detrimental changes and reinstate the options for stateless
temporary relief is not just a matter of administrative efficiency; it is a matter of fundamental human dignity

The proposed changes in Form G-325A would remove statelessness as a ground for pursuing deferred action and thus would negatively affect stateless persons in the United States, their families, and their communities. The proposed changes would also omit special immigrant juvenile status and involvement in labor enforcement investigations as bases for pursuing deferred action, which would undermine law enforcement efforts and discourage children from coming forward to seek help. Thus, we support the consideration of all three of these populations for deferred action. However, we will confine our comments to stateless persons.

JRS/USA has adopted several policy positions related to the prevention and reduction of statelessness in the United States. For example, it supports birthright citizenship, which is guaranteed under the Fourteenth Amendment of U.S. Constitution, serves as an indispensable safeguard against statelessness, and underlies the nation's historic genius in integrating generations of U.S. immigrant families.

Recent news reports have highlighted the odious situations and legal limbo faced by U.S. stateless deportees, such as Bhutanese Lhotshampa and Black Mauritanians. JRS/USA supports a dedicated path to legal status and permanent residence, as well as employment and travel authorization, for select stateless persons, such as those envisioned by the Stateless Protection Act of 2024.

Statelessness is the condition of not being "considered as a national by any State under the operation of its law." It effectively limits work, education, social, healthcare, and other opportunities. It afflicts children born in countries without birthright citizenship, persons who lose nationality and citizenship in the context of state succession, those whose nationality has been revoked by authoritarian governments, and many others.

Deferred action is an exercise of prosecutorial discretion. It does not lead to permanent status. However, it offers employment authorization and temporary protection from removal for a set period. As such, it would address significant needs of U.S. stateless residents.

A comprehensive 2020 report entitled "Statelessness in the United States: A Study to Estimate and Profile the U.S. Stateless Population," reported on the prevalence of statelessness throughout the United States. It offers strong support for the inclusion of statelessness on Form G-325A as a basis for pursuing deferred action. The study identified 37 U.S. populations – by country of origin, ethnic background, language proficiency and date of arrival – with stateless members. It then searched for these populations (principally) in two government datasets, the U.S. Census Bureau's American Community Survey and the Department of State's Worldwide Refugee Admissions Processing System. It found in these datasets a total of 218,000 U.S. resident non-citizens who met these profiles and were potentially stateless or at risk of statelessness. It also identified categories of foreign-born residents who did not fit within the 37 profiles, but nonetheless might include stateless persons.

The study found that stateless persons faced a variety of challenges, such as:

- Limited employment prospects and economic hardship.
- Barriers to travel – both international and domestic.
- Problems in opening bank accounts and securing drivers' licenses.
- Psychological stress and difficulty in developing social relationships.
- Fear of interaction with government officials

These conditions would be mitigated and improved by the ability of stateless U.S. residents to seek deferred action.

In addition, the study concluded that many stateless U.S. residents own their own businesses (thus employing others), have U.S. citizen children and grandchildren, and

Eliminating Labor Investigation Based Deferred Action as a filing type on the Form G-325A—except for Deferred Action for Childhood Arrivals (DACA)—and archiving the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), and Department of Labor (DOL) pages related to the subject, would hamper the ability of people in work visa programs to support the investigation of wage theft, unsafe working conditions, and other workplace rights violations.2 Because this change harms all workers, CDM opposes the revision to Form G-325A.

Undermining access to Labor Investigation Based Deferred Action weakens the enforcement of labor law in the United States and undermines the Memorandum of Understanding between the Department of Homeland Security and Department of Labor.

In a 2011 Memorandum of Understanding between DHS and DOL, U.S. Immigration and Customs Enforcement (ICE) agreed to consider DOL requests for deferred action—a discretionary protection from immigration enforcement—for witnesses involved in an active labor investigation.3 The Trump Administration extended the Memorandum of Understanding in 2018 to include the Equal Employment Opportunity Commission and the National Labor Relations Board.4 The purpose of deferred action as contemplated in the Memorandum is to ensure that workers can cooperate with the federal government in critical investigations without the threat of immigration-related retaliation by low-road employers. The protection also ensures that American companies abiding by labor laws do not have to unfairly compete with those that break them. This Memorandum remains in effect.

Based on this Memorandum of Understanding, in January 2023, DHS announced a streamlined process for reviewing and accepting applications for Labor Investigation Based Deferred Action.5 and employment agencies to more fully investigate worksite violations and support them in fulfilling their mission and holding abusive employers accountable, which protects all U.S. workers.”6 Deferred action reduces the risk of unfair immigration-based retaliation by low-road corporations.7 In addition, by providing a streamlined and efficient process for reviewing applications for deferred action, DHS helped to ensure that DOL could carry out its statutory duties to respond to “time-sensitive labor enforcement interests.”8

Because the proposed revision to Form G-325A would hamper access to Labor Investigation Based Deferred Action, it undermines the purpose of the Memorandum of Understanding. With uncertain access to Labor Investigation Based Deferred Action, people who have no current immigration status and those who have a visa tied to their employer would be less likely to speak out about labor abuses in their workplace for fear of immigration-based retaliation. As a result, federal, state, and local labor agencies would face barriers to effective enforcement because many workers would be unwilling to bring complaints or cooperate in investigations. Reduced enforcement benefits unscrupulous employers who violate basic labor laws and harms employers who follow the law.

Undermining access to Labor Investigation Based Deferred Action would harm workers in the United States who lack immigration status.

People who blow the whistle on abuse should never face retaliation for doing so. Labor Investigation Based Deferred Action helps ensure that people who lack immigration status can safely report workplace abuses to DOL and other labor agencies and participate in investigations to make workplaces better for everyone. These workers’ participation in government investigations benefits all workers, helping to ensure that they and their coworkers have good jobs with fair wages and safe working conditions.

Undermining access to Labor Investigation Based Deferred Action would chill people without immigration status from speaking up about workplace violations. These violations are substantial: workers and their families lose more than $50 billion dollars a year in wage

The Pennsylvania Farmworker Project writes to express its opposition to OMB Control Number 1615-0008, U.S. Citizenship and Immigration Service's proposed revision of Form G-325A to exclude recipients of Labor Investigation Based Deferred Action (LIB DA). Because the proposed Form G-325A changes appear to eliminate any method to apply for LIB deferred action, we are deeply concerned about its effect on the ability of labor agencies to enforce the law and the negative effects on vulnerable workers.

The Pennsylvania Farmworker Project (PFP) is a subunit of Philadelphia Legal Assistance (PLA). PLA is a nonprofit organization that provides free legal services to low-income individuals and families across the region, and PFP focuses specifically on advocating for the rights of agricultural workers throughout Pennsylvania. Our work includes addressing legal issues such as wage theft, discrimination, and unsafe working conditions, while also providing education and outreach to empower farmworker communities.

Eliminating Worker Protections Undermines Both Individual Rights and the Enforcement of Labor Standards

The reality is that many farmworkers, especially those with heightened vulnerabilities, such as legal status or lack of access to legal resources, face systemic exploitation and abuse in the workplace. Farmworkers are often subjected to wage theft, unsafe working conditions, and harassment. Not only that, when workers want to speak up and assert their rights, they are frequently met with retaliation, threats, or termination. The fear of being deported, being "blacklisted," or being barred from future

employment silences many from coming forward. In return, this creates an unhealthy climate in which labor violations go unchecked, allowing employers to operate with impunity, and perpetuating a cycle of exploitation.

We oppose the elimination of LIB DA because it would significantly weaken the protection of some of the most vulnerable workers—immigrant and low-wage agricultural laborers. Programs such as LIB DA ensure farmworkers can report abuses such as wage theft, unsafe housing conditions, and exploitative working conditions without fear of immigration-related retaliation. It gives workers a voice in an industry where silence is often the price of survival. Eliminating LIB DA would strip away one of the few protections farmworkers have, leaving them more vulnerable to abuse and less able to assert their rights safely.

LIB DA allows workers to report workplace violations while still maintaining their ability to work and provide for their families, rather than living in fear of the fallout. In our experience, many farmworkers in abusive workplaces must weigh the benefits of speaking up against the risk of losing income or being removed from the country. In the face of such a dire choice, many feel they have no option but to continue to labor.

LIB DA work authorization "helps encourage exploited workers to come forward, thereby allowing for the vigorous enforcement of labor and employment laws."1 Eliminating the program will undermine labor enforcement by discouraging reporting of labor violations and worker participation in investigations, impacting the enforcement of wage and safety laws that protect all workers, regardless of status.

USCIS Did Not Provide a Reason for the Form Changes, Yet They Will Cause Severe Harm.

USCIS provided no reason for the changes to Form G-325A, eliminating consideration of LIB DA, only stating that it was publishing the proposed form changes to comply with the Paperwork Reduction Act. Yet, the purpose of the Paperwork Reduction Act (PRA) is to reduce the burden of filing paperwork on both the federal government and its constituents.2 Forms issued by the Government are supposed to benefit, not burden the public.3 Despite this requirement, the revisions to Form G-325A, along with USCIS's sunsetting of LIB DA without notice, impose a severe burden on workers who seek the protections outlined in the 2011 Memorandum of Understanding between the Department of Homeland Security (DHS) and the Department of Labor (DOL)4 and the streamlined process to seek those protections issued by DHS.

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Florida Immigration Law & Justice Center writes to express our opposition to OMB Control Number 1615-000
and accompanying Policy Alert that USCIS issued on June 6, 2025, which eradicates the SIJS Deferred Action P
and refer to them collectively as "the SIJS policy changes." These changes will directly and severely harm child
authorization for SIJS-approved youth, putting them in danger of labor exploitation and deportation.

Our organization represents approximately forty-five children, most of whom qualify for or have pending SIJS
they will cause detrimental harm to our clients and similarly situated individuals, with life-altering consequen

The SIJS Policy Changes Terminating Protections for Abused, Abandoned, and Neglected Children Are Contra
Florida Immigration Law & Justice Center strongly opposes the SIJS policy changes, as they undermine the fu
and who would face harm if deported to their country of origin.1 Congress's purpose in creating SIJS was to a
ultimately obtain permanent resident status, giving them the permanency and stability they need to progress

Young people receive grants of SIJS only after satisfying a set of "rigorous, congressionally defined eligibility c
state juvenile court that it is not in their best interest to be returned to their country of origin. A child is grant
country of origin. USCIS has recognized the statute's protective purpose, stating in the Policy Manual that Co
legislative history surrounding SIJS reflects the purpose of the statute to protect young people because "of th

Despite Congressional intent, a now years-long visa backlog prevents SIJS recipients from achieving the perm
access work authorization and were vulnerable to deportation despite both a juvenile court and DHS having a
backlog by protecting SIJS youth who were in a legal limbo for years and unable to access permanent protect
became available, since for many years after implementation of the program, SIJs did have visas immediately
for a visa number to become available. This process furthers congressional intent to provide humanitarian pr

Since May 2022, young people with approved SIJS petitions who are awaiting a visa to apply for lawful perma
over 100,000 SIJS youth. Under the SIJS Deferred Action Policy, when USCIS approves a young person's SIJS pe
amended Form G-325A, a form used to request deferred action, to benefit SIJS youth by creating an SIJS-spec
of their deferred action; the form could also be used for young people with approved SIJS petitions to seek in
Thousands of SIJS youth have deferred action expiration dates of May 2026, and thus, they were counting on
By terminating the SIJS Deferred Action Policy through both the June 6 Policy Manual Update and the propose
Congress in establishing SIJS.

The Policy Underlying the Form G-325A Revisions Has Been Implemented in Violation of the Paperwork Redu
USCIS's proposed changes to Form G-325A make a mockery of the notice and comment procedures. USCIS st
Action Policy altogether.9 Since April 8, 2025, this office has seen several I-360 approvals without any mention
supposedly "proposed" therein that effectively terminated the SIJS Deferred Action Policy. This violates the Pa
any changes are enacted.

USCIS Did Not Provide a Reason for the Form Changes, Yet They Will Cause Severe Harm.
USCIS provided no reason for the changes to Form G-325A, eliminating consideration of SIJS-based deferred
(PRA) is to reduce the burden of filing paperwork on both the federal government and its constituents.
11 Forms issued by the Government are supposed to benefit, not burden the public.12 Despite this requirem
had secretly enacted the policy change, impose a severe burden on children and youth who have been grante

The Ability to Obtain Employment Authorization Protects Youth Against Labor Exploitation, Permits Youth to S
Deferred action provides SIJS youth with protection from deportation, as well as access to an employment au
exploitation as they await available visas to apply for adjustment of status. Granting deferred action to noncit
of labor and employment laws."13 EADs also enable SIJS recipients to begin careers and fund post-secondary

Manual that SIJS was “created to provide humanitarian relief to abused, abandoned, or neglected noncitizen children.”5 Legislative history further underscores this intent, highlighting the unique vulnerability of children and the challenges of deporting minors.6

Yet, due to a persistent visa backlog, thousands of approved SIJS recipients remain in legal limbo—unable to apply for green cards and at risk of deportation.7 Recognizing this gap, USCIS introduced the SIJS Deferred Action Policy in May 2022.8 This policy provided temporary protection from deportation and access to work authorization for SIJS recipients waiting for a visa number, in alignment with congressional intent. At the time, USCIS stated:

Congress likely did not envision that SIJ petitioners would have to wait years before a visa became available.... This process furthers congressional intent to provide humanitarian protection for abused, neglected, or abandoned noncitizen children.9

Since its implementation, the Deferred Action Policy has protected more than 100,000 SIJS recipients. USCIS automatically considered eligible youth for a four-year, renewable, grant of deferred action upon SIJS petition approval. In 2024, USCIS even revised Form G-325A to streamline the deferred action process for SIJS youth—enabling both initial and renewal requests, with many recipients preparing to renew their protection starting in December 2025. USCIS stated that SIJS youth whose deferred action grants were expiring in 150 days or fewer could use the form to request a renewal of their deferred action; the form could also be used for young people with approved SIJS petitions to seek initial consideration for deferred action, if for some reason they did not have a deferred action adjudication contemporaneously with their SIJS petition approval notice. Thousands of SIJS youth have deferred action expiration dates of May 2026, and thus, they were counting on using the Form G-325A process to apply for renewal starting in December 2025.

However, the June 6, 2025, Policy Manual Update and proposed changes to Form G-325A now abruptly terminate this lifeline. By ending the SIJS Deferred Action Policy, USCIS is stripping vulnerable youth of critical protection from deportation and labor exploitation. This action directly contradicts congressional intent and threatens the well-being of tens of thousands of young people who have already been deemed eligible for humanitarian relief under the law.

II. The Revisions to Form G-325A Violate the Paperwork Reduction Act and Undermine Transparency

USCIS’s proposed changes to Form G-325A—eliminating the option for SIJS-based deferred action—were implemented in direct violation of the Paperwork Reduction Act (PRA). This statute requires federal agencies to allow for public input before modifying official forms: a 60-day noticeand-comment period, consideration of submitted feedback, and then a 30-day secondary review period.10

Yet USCIS began denying deferred action SIJS recipients as early as April 2025, this reported by our affiliates on multiple occasions. It was not until June 6, 2025, that the agency issued a policy alert formally terminating the SIJS Deferred Action Policy.11 In the meantime, USCIS quietly released proposed revisions to Form G-325A on May 29, 2025—more than six weeks after the changes had already been functionally implemented.

This sequence of events reflects a serious violation of the PRA’s requirements and a lack of transparency in policymaking. Rather than inviting meaningful public participation, USCIS made sweeping procedural changes behind closed doors and retroactively sought to justify them through an untimely “proposal” of a change that the agency was already unjustly implementing.

III. USCIS Gave No Justification for the Form Change—Yet the Harm Is Profound

USCIS offered no substantive explanation for the removal of SIJS-based deferred action from Form G-325A, stating only that it was acting in compliance with the Paperwork Reduction Act.

Kids in Need of Defense (KIND) respectfully submits the following comment in response to the notice publish
Biographic Information (for Deferred Action).” KIND is deeply concerned that the proposed revisions, which w
Juvenile Classification and Deferred Action, will eviscerate critical protection against removal to harm for thou
courts as having experienced abuse, abandonment, neglect, or other similar harm such that return to their c
Congress enacted specific protections to prevent. The changes would also eliminate access to and renewal of
labor exploitation and trafficking, while also eliminating a vital form of government-issued identification that
Although the Policy Alert characterizes the elimination of SIJS Deferred Action as necessary to “closely align a
traumatization and harm, disregarding congressional intent and the public interest, and creating inefficiencie
2
the form’s use by Special Immigrant Juveniles to request or renew deferred action, are especially alarming an
implement a range of measures that restrict access to due process, legal services, and humanitarian protecti
harm to children, the changes only increase the likelihood of such dangers. We urge USCIS to immediately re
This comment details the specific impacts of these policy changes for unaccompanied children, as viewed thr
national organization working to ensure that no child faces immigration court alone. KIND has provided lega
in the United States, and formed pro bono partnerships with nearly 900 corporations, law firms, law schools,
management, educational support, access to housing and medical care, community referrals, and other servi

The Elimination of SIJ Deferred Action Contravenes Specific Statutory Protections and Congressional Intent to
Through its work, KIND has developed extensive experience working with children who have sought protecti
legal protection to children’s ability to find safety, recover from trauma, realize dreams and goals, and thrive
process, reactivate children’s fears that they may be deported to mistreatment and other harm. Such change
necessary services and assistance. USCIS’ recent shift in course only heightens risks to children—moving fron
Administration’s enforcement efforts intensify. In doing so, these changes run counter to the intent of Congr
Congress first created SIJS in 1990 to address gaps in protection identified by child welfare authorities for und
subsequently expanded this protection through the Trafficking Victims Protection Reauthorization Act of 200
stability and protection from deportation SIJ children need to be able to heal, to overcome the impact of the a
The title of the relevant TVPRA subsection—"Permanent Protection for Certain At-Risk Children”—reflects rec
Adjudication” of children’s SIJ petitions, requiring DHS to adjudicate children’s applications not later than 180
take measures locally to ensure timely adjudication.”6
The centrality of child welfare to SIJ protection is evident in the application process set forth by Congress, whi
immigration relief.7 For a child to qualify for SIJ protection, a state juvenile court must find that a child cannot
to be returned to their country of origin.8 With a predicate order containing such findings, a child can submit
regarding the child’s best interests and mistreatment.9 If approved for SIJS, a child or youth may apply to adj
Upon SIJ’s creation by Congress, SIJ visas were available without delay, enabling eligible children and youth to
access visas and adjust to LPR status.10 Over the decade, it is likely that hundreds of thousands of children ha
approved children and youth experienced significant uncertainty and distress, remaining at risk of deportatio
term safety as Congress intended, these circumstances exacerbated the trauma of particularly vulnerable chi
category meant to provide protection against child maltreatment; in this way it is more akin to asylum than to
child welfare concerns that lie at the heart of SIJS reflect a misordering of priorities.”11
Recognizing the harsh consequences confronting a population of children and youth who Congress intended
directly addressed the gap the policy was intended to fill, explaining: “Due to ongoing visa number unavailab
limbo. . . . Congress likely did not envision that SIJ petitioners would have to wait years before a visa became a
provide humanitarian protection for abused, neglected, or abandoned noncitizen children for whom a juveni
automatically considered for a four-year grant of deferred action, with the opportunity for renewal.
This critical protection, which upholds the aims of the SIJ statute by ensuring that delays outside of the child’s
allows USCIS and the federal government to more effectively allocate limited resources, recognizing that you
USCIS’s decision to eliminate a process by which current SIJ deferred action recipients can renew this protecti

NJCIC is firmly opposed to the proposal to revise Form G-325A to exclude recipients of Special Immigrant Juve
eliminates the SIJS Deferred Action Policy, and therefore, our comment will collectively address the harmful in
putting them in danger of labor exploitation, human trafficking, and deportation—and in turn, harm the fam
be rescinded.

1.USCIS did not follow the procedure set out under the Paperwork Reduction Act in implementing the SIJS po
The Paperwork Reduction Act (PRA) sets out the procedure for a government agency to revise certain docume
comment period, followed by agency consideration of comments received, and finally an additional 30-day co
PRA, as USCIS effectively terminated the SIJS Deferred Action Policy several weeks prior to the publication of a
received seven I-360 approvals without any mention of deferred action, four of which were received between
issued a policy alert terminating the SIJS Deferred Action Policy.2
Furthermore, the PRA was designed with the purpose of minimizing the paperwork burden for individuals, th
benefit from and maximize the utility of information created, collected, maintained, used, shared and dissem
benefit, not burden, to the public. The proposed revisions to Form G-325A, along with USCIS's decision to term
laws to protect. We therefore request that this policy be rescinded.

2.The proposed SIJS policy changes contravene the purpose and intent of SIJS, as set out by Congress in the I
NJCIC is deeply concerned that the SIJS policy changes undermine the fundamental purpose of the SIJS-relate
face harm if deported to their country of origin.4 Congress's purpose in creating SIJS was to afford vulnerable
resident status, giving them the permanency and stability they need to progress in their young lives.
Young people receive grants of SIJS only after being found to satisfy a set of "rigorous, congressionally define
determination from a state juvenile court that it is not in their best interest to be returned to their country of
determination made by the juvenile court, including that it is not in the child's best interest to be returned to
classification to provide humanitarian protection for abused, neglected, or abandoned alien children."7 The le
Unfortunately, a now years-long visa backlog has developed that prevents SIJS recipients from receiving the p
work authorization and remained vulnerable to deportation despite both a juvenile court and DHS having aff
backlog by protecting SIJS youth who were in a legal limbo for years and unable to access permanent protect
Congress likely did not envision that SIJ petitioners would have to wait years before a visa became available, s
to protect SIJs who cannot apply for adjustment of status solely because they are waiting for a visa number to
a juvenile court has determined that it is in their best interest to remain in the United States.11
Under the SIJS Deferred Action Policy, when USCIS approved a young person's SIJS petition, it automatically c
to have benefited over 100,000 SIJS youth.
Following the adoption of the SIJS Deferred Action Policy, in 2024, USCIS amended Form G-325A, a form used
150 days or fewer could use the form to request a renewal of their deferred action; the form could also be us
adjudication contemporaneously with their SIJS petition approval notice. Thousands of SIJS youth have defer
By terminating the SIJS Deferred Action Policy through both the June 6 Policy Manual Update and the propose
Congress in establishing SIJS.

3.
The SIJS policy changes will lead to the detention and deportation of SIJS Youth, placing them at risk of furthe
The Department of Homeland Security has recently stated that "President Trump and Secretary Noem take th
that children are safe from abuse, sexual exploitation, and trafficking."13 Despite this, the administration has
detained and removed—despite Congress' intent when it adopted the INA—placing them at risk of further ab
Prior to the adoption of the 2022 SIJS Deferred Action Policy, DHS routinely pursued removal orders against S
with colleagues at law firms and nonprofits about several cases where DHS has arrested, detained, and advo
action. As such, we are gravely concerned about the devastating impacts of the SIJS policy changes for the ch
wait in a precarious legal limbo until a visa was available to live their lives and pursue employment opportuni
needs. Many of our clients may also find themselves facing detention and deportation, despite legal findings

I am writing to express my opposition to USCIS's June 6, 2025 termination of the Deferred Action Policy for children and youth who have been approved for Special Immigrant Juvenile Status (SIJS). I am also asking USCIS not to make the proposed changes to Form G-325A. These changes merely reflect the end of SIJS deferred action, a policy change that harms children and should not have taken place. Furthermore, the termination of the SIJS Deferred Action Policy has already occurred and asking for feedback on the form after the fact only demonstrates the lack of care behind USCIS's termination of these protections. It is also against the law which requires that there be notice of the form change and time for the public to comment on it before its implementation. I implore USCIS to reinstate Deferred Action for these young people who, but for a visa backlog, would have permanent protection. These youth are on a pathway to lawful permanent resident status and should be protected until they are able to obtain the safety and stability they need. This is why USCIS originally created the SIJS Deferred Action Policy in 2022. Moreover, USCIS granted these children SIJS because they need protection, but this policy change puts them at risk of deportation and other harms for reasons beyond their control.

I care about this issue because I have worked and volunteered in migrant justice for the past 15 years. I have interviewed countless kids in our country's immigration system, and I am deeply concerned for their mental health and physical safety as a result of this policy change. Many of them will be at risk for deportation, which could put them in immediate danger. We should be taking care of our youth in the United States, not putting them in harm's way through unnecessary procedural changes.

Ending Deferred Action for SIJS youth puts at risk some of the most vulnerable immigrant young people in the United States—those who have experienced abuse, abandonment or neglect by a parent. This policy change contradicts the protective reasons that the U.S. Congress created this status in the first place.

Deferred Action has been necessary because SIJS was inaccurately categorized as an employment visa even though it is a humanitarian protection for children, placing SIJS petitioners alongside adults seeking employment-based status in a category with a limited number of visas for green cards. This has resulted in youth who have been approved for SIJS being forced to wait in a years-long visa backlog, rather than receiving immediate and permanent protection. Deferred Action should continue until the visa backlog ends, and until every child is able to access the stability and protection they need.

Ending Deferred Action for SIJS youth bars their access to work permits for years while they are trapped in the visa backlog. Work permits provide protection from labor exploitation, allowing SIJS youth to work lawfully, earn money for basic needs, and continue education and workforce preparation while waiting in the backlog during a pivotal time in their transition to adulthood.

Deferred Action for SIJS youth helps to protect these children from abuse, sexual exploitation, and trafficking, a stated concern for President Trump and DHS Secretary Noem, and a concern for the American people.

Please reinstate Deferred Action for SIJS youth in the visa backlog. Please abandon the changes to Form G-325A. Protecting children already present in our communities is important to me as an American and represents our national values. These children have already been through so much and should be supported and protected, not facing fear of deportation and exploitation.

The Children’s Partnership’s support for SIJS youth is grounded in years of research and direct engagement w
report— Healthy Mind, Healthy Future —finds that there are implications to health that are inextricably tied t
harm extends to entire communities, including schools, health professionals, and teachers. Therefore, in ord
vulnerable children in our communities.

Ending Deferred Action for SIJS youth puts at risk some of the most vulnerable immigrant young people in th
Congress created this status in the first place.

Deferred Action has been necessary because SIJS was inaccurately categorized as an employment visa even t
visas for green cards. This has resulted in youth who have been approved for SIJS being forced to wait in a ye
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Ending Deferred Action for SIJS youth bars their access to work permits for years while they are trapped in th
and workforce preparation while waiting in the backlog during a pivotal time in their transition to adulthood.

Deferred Action for SIJS youth helps to protect these children from abuse, sexual exploitation, and trafficking

Please reinstate Deferred Action for SIJS youth in the visa backlog. Please abandon the changes to Form G-32
through so much and should be supported and protected, not facing fear of deportation and exploitation.

combat and prevent trafficking, it violates the TVPRA.

A. Work Authorization Is an Anti-Trafficking Measure

Facing years without work authorization will mean that special immigrant juveniles are unable to provide for their basic needs. As experts on trafficking routinely note, such situations force people, children especially, to either enter relationships of dependency that can easily turn exploitative or to turn to informal means of paying rent and getting food or healthcare. In Minnesota, studies show that children often turn to “survival sex” based solely on the need to

1 https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20250606-SIJDeferredAction.pd

provide for themselves where they lack other means of support.2 Additionally, in our work, we have identified that people remain in abusive or trafficking situations due to dependency on traffickers. The DA for SIJS pathway is a low cost to the Department—indeed, the Department provides no financial need justifying the change—but saves lives by ensuring youth can obtain work permissions that allow them independence.

B. DA reduces trafficker ability to coerce control through immigration threats

In addition, vulnerability to immigration consequences leaves people at risk of trafficking and also increases the likelihood of losing witnesses who may be deported. As noted, fear of removal or immigration consequences creates vulnerabilities to trafficking as traffickers wield threats of deportation and detention as a means of coercive control. We have had several unaccompanied minor clients who were trafficked or exploited by individuals who threatened to call ICE on them. In several cases, traffickers withheld immigration documents so that children would miss immigration court hearings, causing them to be more fearful of removal due to in absentia orders. In cases involving adult victims, we routinely hear that traffickers have kept them working in dangerous conditions of servitude by exploiting fears of deportation, control of visa status, and other threats of the legal process. The grant of deferred action while SIJS visas become available alleviates this fear for children, allowing them to avoid the risk of trafficking, escape trafficking situations, and participate in investigations of crimes. For victims of labor exploitation, it similarly eliminates such fears, allowing cooperation with investigations that not only stop such violations but prevent and identify broader labor trafficking schemes that all-toooften are indicated by labor exploitation.

C. Deferred Action allows victims time to build trust and overcome trauma

Moreover, many victims of trafficking may not immediately feel safe reporting their experience or may not self-identify as a victim. It can take months to build trust before they share the trafficking, particularly amongst children. Additionally, they often may not report unless and until vulnerabilities that the traffickers exploited are addressed. For example, if a trafficker threatened immigration consequences or threatened the loss of their food and housing provided by the trafficker, children will fear reporting because they fear such consequences. Deferred Action addresses this by ensuring children can get work permits that may allow them to support themselves and by removing fear of immigration consequences. In our experience, this has allowed children to report and escape situations. Because Congress intended in the TVPRA to encourage victims of trafficking to participate in prosecutions and to protect trafficking victims, providing DA does serve a congressional purpose by increasing the likelihood that victims will report. Additionally, by providing interim immigration protections, it also means witnesses will not be deported before the case can proceed to hold traffickers accountable.

2 https://www.cbsnews.com/minnesota/news/survey-5000-minnesota-high-school-students-have-traded-sex-
of-value/

While the Department may argue that the T nonimmigrant status is how congress intended to protect trafficking victims, that is but one arrow it provided to the executive in an overarching anti-trafficking mandate. T nonimmigrant status applications may be available for trafficking

The End SIJS Backlog Coalition (â€œthe Coalitionâ€) writes to express our opposition to OMB Control Numbe
(SIJS). We also strenuously oppose the Policy Manual changes and accompanying Policy Alert that USCIS issue
deferred action, this comment will address the harmful impact of both and refer to them collectively as â€œt
peopleâ€™s families and communities.

The Coalition, a project of the National Immigration Project, is a national group of over 100 child welfare and
administrative agencies, and the public about the harmful impacts of visa caps on vulnerable immigrant chil
that advocates alongside SIJS youth, we are in the unique position to center the perspectives of SIJS youth wh
their firsthand accounts of the harms of these policy changes on their lives, with the goal of centering their e
of SIJS. All youth names are pseudonyms to protect the identity of our youth leaders who have bravely contrib

I.

Background on the SIJS Backlog

SIJS is a humanitarian status that provides protections and a pathway to lawful permanent resident (LPR) stat
juvenile court has determined that it is not in their best interest to be returned to their country of origin. Star
SIJS visa backlog began. SIJS youth are subject to annual visa caps because, by statute, their visas derive from
SIJS backlog.1 While historically SIJS youth from El Salvador, Guatemala, Honduras, and Mexico have been the
the purpose of the SIJS statute, which is realizing permanent legal protection in the United States for immigra
extensively about the need for protection from deportation and access to work permits for SIJS youth while th
administrative agencies to mitigate the worst harms of the backlog, including by advocating for the now-term
ensure that SIJS youth can remain safely in the United States until they can apply for LPR status. We urge USC

II.

A New Start: The Impact of Having Deferred Action and Work Authorization on SIJS Youth

Since May 2022, young people with approved SIJS petitions who are awaiting a visa to apply for lawful perma
200,000 SIJS youth.4 This policy was created to protect and support SIJS youth who were trapped in a years-lo
safe, and finally given an opportunity to build a life and serve their communities while waiting for a visa.

By terminating the SIJS Deferred Action Policy through both the proposed Form G-325A revisions and the Jun
their families, and live without fear. Stripping away this protection undermines their progress and harms the

III.

Lingering Pain: The Harm Caused by USCIS's Termination of SIJS Deferred Action

Removing SIJS from Form G-325A is more than a minor change of a form—it is a deliberate and heartless poli
Deferred Action Policy since its inception. Beginning in April 2025, the Coalition began receiving reports from
website. Since then, we have received reports of hundreds of SIJS youth whose deferred action requests have
document (EAD) applications. All of this occurred silently until USCIS first published notification of the propos
Manual provisions to remove the language about the SIJS Deferred Action Policy.5

News of the official termination of the policy hit the SIJS youth community with devastating and immediate im
deferred action and that the policy had been terminated include, "anxious," "scared," "sad," "helpless," and "ve

USCIS's proposed changes to Form G-325A have brought the hopes and dreams of thousands of young peop
in December 2025. By eliminating SIJS from the form, USCIS is not just changing the words on a form, USCIS i
overwhelmed.

With no explanation for the changes to Form G-325A, USCIS eliminated consideration of SIJS-based deferred a
burden of filing paperwork on both the federal government and its constituents.6 Forms issued by the Gover
USCIS's decision to terminate the SIJS Deferred Action Policy, impose a severe burden on children and youth

The Immigrant Legal Advocacy Project (ILAP) respectfully submits the following comments regarding the For
changes, as well as the accompanying changes in the USCIS Policy Manual, be stricken in their entirety and p
to apply for a green card.

I. About ILAP & Expertise in Impact of Form G-325A and Policy Manual Changes:

ILAP is Maine's only statewide immigration legal services organization, serving low-income people across the
representing vulnerable noncitizen children in Maine in the Special Immigrant Juvenile (SIJ) classification proc
working group of practitioners in Maine who serve children in the SIJ classification process, and partners with

II. ILAP Recommends the Changes to Form G-325A and the USCIS Policy Manual Re: Special Immigrant Juveni

The changes to Form G-325A and the USCIS Policy Manual needlessly put at-risk immigrant youth in even mo
able to apply for lawful permanent residency. In Maine, ILAP serves more than 200 children who will be made
Congress created the Special Immigrant Juvenile classification in 1990. The law, and underlying intent, seeks
intended for at-risk children who have been SIJ classified to have swift access to apply for lawful permanent s
Accordingly, in order to align with Congressional intent, USCIS rightly put in place a

Deferred Action policy in March 2022 to create a bridge between SIJ classification and availability of visas, ens
1 Since this policy was put in place – which automatically considers a 4-year, renewable grant of Deferred Acti
better support themselves and build key skills for their futures. Additionally, and significantly, access to work
The ability to access Deferred Action is life-changing for our most vulnerable child clients. In a recent case, ILA
because of this abuse and does not know how to read or write. In the United States, she lacks any family willi
her significant trauma history. The changes to the Deferred Action policy harm countless children like this you
The job of the agencies is to implement and execute the laws that Congress passes, in line with a democratic
of Congress' goals in creating the SIJ classification, which the agency itself notes in its policy alert: "While Con
related employment authorization for this population."2 In creating SIJ, Congress provided a pathway to citize
provide permanent protection and stability to this extraordinarily vulnerable group, not deport them. By elim

III. Conclusion:

In conclusion, USCIS should withdraw the changes to Form G-325A and changes to the USCIS Policy Manual a

I write on behalf of my organization, a law firm, to express our opposition to the proposed revision of Form G
My organization represents many SIJS beneficiaries across EOIR removal proceedings, in state courts, and wit

The proposed change barring SIJS youth from applying for Deferred Action will have a variety of negative con
adjust status. Many of them lack means to obtain any government identification from their country of origin t
having any legal identity. Their lack of US identification or a social security number compounds the difficulties

In addition to the "BBB" law and changes to DHHS, DOJ, and DOAg public benefits eligibility policies just this r
emergency services to which they still may be entitled. Thus during the backlog, they face immense barriers t

Without deferred action and subsequently an EAD, they will be unable to obtain learner's permits or driver's l
obligated to provide for them as they transition to adulthood, and few or no social programs can provide for
work or illegal activities. This decision is a boon for traffickers and unscrupulous businesses to exploit youth v

In the midst of a demographic crisis with our aging population that does not replace itself, the USA having yo
labor pool. It is also statistically true that legal immigrants like these SIJS recipients are more likely to start bu
likely to commit crimes than the native-born. All of this will remain true if we do not mistreat, expel, or alienat

The lack of deferred action will also muddy their ability to fight against removal/deportation, even though the
the Deferred Action consideration is precisely to discern who may still be removable. Settling the issue with th

DA also gives these youth, who are often extremely traumatized, much-needed and often very-long-awaited p
of society. By removing DA as a possibility, making immigration 'enforcement' an ever-present possibility inst
othering them, and setting them up to fail, this policy change appears to turn potential social assets into liabi

All of this is particularly tragic, as it was judicially determined for each SIJS beneficiary that they have been ab
are among the most vulnerable members of our society, with fewer social and financial resources to survive.

This form revision thus encapsulates a policy change that is pointlessly cruel toward the least of us. It's unnec
general population.

I am a pro bono attorney who has and continues to represent since 2017 youth affected by the SIJS and deferred action policies of USCIS. I oppose the changes to the Form G325A which would apparently preclude youth with SIJS from applying for and receiving deferred action and, as a result, also bar them from applying for an obtaining a work permit and extending such permits while they spend years waiting to apply for permanent resident status. I say "apparently" because the notice is wholly inadequate. I would not know what USCIS was actually proposing by a notice talking about information collection, except for a notice I got from the National Immigration Project, End SIJS Backlog Project. I wish to associate myself with that organization's comments on this change to Form G325A and overall policy change. This lack of adequate notice is not in accordance with the Administrative Procedures Act. The public does not know what the government’s rationale is for this policy change, and it makes no sense.

My clients with SIJS are waiting for years to apply for permanent resident status because the US State Department Visa Bulletin is so backlogged. The date when SIJS recipients can apply has been set back two years on two occasions since 2021, and the government stated several months ago that the date will be frozen for the rest of this fiscal year. This is not what Congress intended by granting this humanitarian relief via the SIJS statute.

The harm from this excessive waiting period was mitigated by the policy to allow SIJS recipients to automatically receive or apply for deferred action and then apply for an receive work permits under category (c)(14). I have several clients who have done so, and they are able to support themselves and work in legitimate jobs. Not only does this benefit them, but it benefits the government and US public: they do jobs that are difficult or impossible to fill otherwise and they are protected from labor exploitation. Moreover, they pay Social Security and other taxes, without getting any credit toward their own benefits. I have read that immigrants in general contribute Billions to Social Security. So this policy change is actually self-defeating for the government.

I urge your agency to reconsider this change to Form G325A and

I.Terminating Access to Protections for Abused, Abandoned, and Neglected Children Undermines the Intent a
Children's Rights opposes the Form G-325A revisions that prevent children with approved SIJS petitions from
provisions of the INA in 1990 to protect children who have experienced parental abuse, neglect, or abandonm
Intent and Purpose of the SIJS Statute
Children's Rights opposes the Form G-325A revisions that prevent children with approved SIJS petitions from
provisions of the INA in 1990 to protect children who have experienced parental abuse, neglect, or abandonm
states as "depressed," "numb," "stuck," "worried," and "scared."14 Further denying these vulnerable young pe
permanent protection to these children.15
Due to these visa backlogs, SIJS youth remained vulnerable to deportation and ineligible for work authorizati
2022. The SIJS Deferred Action Policy addressed this gap by offering protection to SIJS recipients waiting for v
"Congress likely did not envision that SIJ petitioners would have to wait years before a visa became available,
humanitarian protection for abused, neglected, or abandoned noncitizen children for whom a juvenile court
faster access to work authorization "so they can begin rebuilding their lives and . . . feel secure and not fear d
In 2024, USCIS updated Form G-325A, which allows SIJS youth to request deferred action, and created a dedic
SIJS youth currently have deferred action that will expire in May 2026 and were preparing to apply for renewa
By revising the Form G-325A to prevent SIJS youth from applying for Deferred Action, USCIS is eliminating ess
direct contradiction of the U.S. Congress' protective goals in enacting the SIJS statute.

II.Proposed Revisions to the Deferred Action Application Expose Children to Harm
A. Without Deferred Action, SIJS Youth Face Increased Risk of Harmful Detention and Deportation
USCIS's proposed Form G-325A changes prevent SIJS youth from accessing deferred action, which exposes hu
already been determined, by both a juvenile court and DHS, to be survivors of abuse, neglect, or abandonme
psychological distress and require targeted services addressing their mental health and trauma experiences.
leaving them vulnerable to deportation to the very countries that the courts and DHS have already determine
Despite statements from the Department of Homeland Security claiming to prioritize the safety of children, th
administration and the first Trump administration, DHS has detained and pursued removal orders against SIJ
residency.21 Before the Deferred Action Policy went in effect in 2022, 92% of Honduran SIJS youth who applie
hand, removal orders were pursued against only 27% of SIJS youth from other countries. These disparities sh
opposition to congressional intent to protect all maltreated children.22
Terminating deferred action for young people with SIJS also exposes children to debilitating fear of potential
everything up in the air, wondering when will they come for me?"23 Taking away access to deferred action wi
goals of both child welfare and humanitarian protection.
Ending access to deferred action almost certainly guarantees increased detention for SIJS youth awaiting visa
detention of any length can severely impact a child's well-being, leading to increased rates of depression, anx
are especially pronounced for youth who have already survived abuse, neglect, or abandonment—the very p
The risk of detention not only threatens youth safety but also deeply undermines their development and tran
cases, the stress and isolation of confinement can lead to developmental delays, eating disorders, or even su
In light of these grave concerns, deferred action remains an essential protection to carry out the humanitaria

B. Employment Authorization Is Crucial for Safety, Education, and Permanent Integration of Children
Deferred action allows SIJS youth not only to remain in the United States lawfully but also to obtain an Emplo
a visa to adjust their status. Granting deferred action to noncitizens who wouldn't otherwise access work auth
But without deferred action, SIJS youth lose that protection. Many immigrant youth work in low-wage sectors
consequences. 29 For SIJS youth, this means that the removal of deferred action would likely create a chilling
Employment authorization is not only about supporting SIJS youth; it is also about securing their safety, digni
Access to work authorization also enables SIJS recipients to pursue post-secondary education and careers, op
served as a critical space for integration, access to mentors, and transitioning into adulthood with peers.31 F
industries. Also, EADs serve as valid identification, enabling access to vital public services, such as eligibility fo

The Immigration Court System Will Be Further Congested Without SIJS Deferred Action:

SIJS Deferred Action typically resulted in the termination or administrative closure of immigration court cases contributing to the already large immigration court backlog which is currently over 3.5 million cases. With the traditionally required such representation, further reducing their capacity. LSPs will require ongoing and con comes with a cost of time and resources. As a result, caseloads will stall and LSPs will become unable to move

Conclusion

For all of the foregoing reasons, Acacia urges USCIS to reinstate the SIJS Deferred Action Policy and maintain

SIJS was Created to Protect Children and Youth Who are Among the Most Vulnerable
SIJS was created for undocumented youth in the foster care system, and initially, only youth that were adjudic
face deportation or unstable undocumented status.1 Amendments to the program have occurred over time t
(the Wilberforce Amendments) to include youth for whom reunification with one or more parents was not via
child welfare reform to promote children and youth maintaining connections with family and achieving perm
eligibility criteria," including having been placed by a juvenile court in the custody or guardianship of a U.S.-re
Congress's purpose in creating SIJS was to afford vulnerable immigrant children who survived various forms o
permanency and stability they need to progress in their young lives. In support of the intent, USCIS has recog
protection for abused, neglected, or abandoned alien children." The legislative history surrounding SIJS reflec

Deferred Action Is Critical to Fulfilling the Purpose and Intent of the SIJS Statues and Promoting the Health ar
children and youth who have suffered parental maltreatment and who would face harm if deported to their c
and Deferred Action is a practical and reasonable solution to the problem.

The SIJS Backlog is a Problem Created by Government, that Government has a Responsibility to Solve
USCIS created the SIJS Deferred Action Policy to further Congressional intent and remedy the impacts of the u
enacting the policy, USCIS stated,
"Congress likely did not envision that SIJ petitioners would have to wait years before a visa became available,
to protect SIJs who cannot apply for adjustment of status solely because they are waiting for a visa number to
a juvenile court has determined that it is in their best interest to remain in the United States."3
Since May 2022, young people with approved SIJS petitions who are awaiting a visa to apply for lawful perma
over 100,000 SIJS youth. Under the SIJS Deferred Action Policy, when USCIS approved a young person's SIJS pe
amended Form G-325A, a form used to request deferred action, to benefit SIJS youth by creating an SIJS-spec
of their deferred action; the form could also be used for young people with approved SIJS petitions to seek in
Thousands of SIJS youth have deferred action expiration dates of May 2026, and thus, they were counting on
By terminating the SIJS Deferred Action Policy through both the June 6 Policy Manual Update and the propose
Congress in establishing SIJS.

Work Authorization and Deferred Action Have Clear Benefits for Young People and their Families
The ability to enter the workforce lawfully creates incalculable opportunities for youth who are often left behi
mentors."4 A robust body of empirical research has found positive effects for work authorization programs th
For example, research examining the experience of Deferred Action for Childhood Arrivals (DACA) recipients,
economic security. Professor Tom K. Wong of the University of California, San Diego conducted annual survey
latest survey of 560 DACA recipients in 2023 found that 94.3 percent were currently employed, and their aver
population pursuing a bachelor's degree or higher. Of those currently in school, 65 percent said that because
a bachelor's degree or higher. Finally, the survey found that 9.5 percent of respondents are business owners.
worked among DACA-eligible young people who were 24 years old or younger at implementation.7
These benefits reverberate across generations, as many young people who have benefited from DACA are no
from the economic security that comes with their parents having work authorization, but studies have also sh
among their children.9
Research has also found significant improvement to family economic security and well-being when VAWA Self
violence and abuse. For this population, research documents how work authorization not only increases wag
stability for themselves and their families. Specifically, a 2023 study of survivors of gender-based violence in M
access to paid sick leave and other workplace protections, and improved other markers of well-being.10 Base
$260 to $590 (a 127 percent increase) for the women interviewed in 2018 and 2019, and from $230 to $390 (a
employment, improved access to health care, more safe and stable housing, and other improvements to thei
As the research and analysis of work authorization for both U Visa/VAWA Self-Petitioners and DACA recipients
wages, improved workplace conditions, increased access to basic protections such as paid sick days and healt
members. Notably, the research suggests that accessing work authorization is particularly beneficial for indiv

SIJS History, Purpose, and Wait Times for Relief:
SIJS provides a pathway for noncitizen youth to become Lawful Permanent Residents (LPRs) and, eventually, U
juvenile court must make legal findings that they have been abused, neglected or abandoned by one or both
last habitual residence.2 Because of the extreme vulnerability of these youth, Congress mandated that USCIS
Although SIJS is a humanitarian status, it is categorized as an “employment based” process, resulting in a cap
focusing on certain countries like Honduras, El Salvador, Guatemala, Mexico and India, barring youth from th
impact on these children who live in fear with the uncertainty of possible removal for years while they await v
work to create a stable and successful life in the United States. We urge USCIS to restore this critical protectio
the resources necessary to their daily life.

II. The Impact of Deferred Action on SIJS Youth and Our Communities:
Starting on May 6, 2022, USCIS established a policy granting Deferred Action, or protection from deportation
sense measure, due to the massive visa backlog. Deferred Action became a safe haven for our vulnerable you
not in their best interest, it presents the potential for violence or even death. In addition, the employment au
Deferred action and employment authorization documents are significant to our client’s case for multiple rea
our SIJS youth; it facilitates important goals, such as seeking post-secondary education, paying taxes, and so
youth have access to the resources needed to build a better future, pursue a career, and meaningfully contri
These changes are devastating for immigrant youth who turn to the U.S. for protection after experiencing tra
unmanageable wait times. Deferred Action and the access it provides to work authorization were created to s
Without it, SIJS youth face the risk of being returned to dangerous situations from which they seek this count

The Northwest Immigrant Rights Project submits this comment in response to the U.S. Citizenship and Immig
May 29, 2025.

NWIRP has particular expertise on the topics of the Special Immigrant Juvenile ("SIJ") classification and deferr
immigration legal services in the Pacific Northwest. NWIRP is deeply concerned about the impact of eliminati
country. NWIRP's offices represent a large number of children and youth who are or are eligible to become Sp

3. Recommendation to Retain Special Immigrant Juvenile Classification as a Category for Deferred Action Req
USCIS's current version of Form G-325A includes SIJ as a category under which individuals can request deferr
category under which to request deferred action will harm some of the most vulnerable members of our soci
Page 3 of 7
a. Visa Unavailability Makes Deferred Action Essential
The elimination of deferred action occurs against the backdrop of severe visa retrogression that makes adjus
extending already substantial wait times by additional years. See Visa Bulletin for July 2025, Number 4, Volum
immigrant youth were trapped in this backlog of being otherwise eligible to adjust status but waiting for a vis
Law's Immigrant Rights Clinic (Dec. 2023). The backlog, caused by a technical oversight by Congress, has mor
in this visa backlog puts them at risk of further abuse—and even deportation—regardless of the state juvenil
necessary safeguard during these predictable delays given that the visa backlog has tended on an upward tra
The 2025 USCIS Policy Manual update halting automatic consideration of deferred action for Special Immigra
USCIS nonetheless has chosen to remove the protection that allows youth to build stable lives while they awa
Services (June 6, 2025). This creates an untenable situation where children and youth who have already satisf
unlawful deportation risks solely due to bureaucratic processing delays. The looming revision of Form G-325A
undermining the humanitarian purpose of Congress's SIJ classification.
b. The Elimination of SIJ Deferred Action Destroys an Essential Pathway to Employment Authorization
The revision to Form G-325A removes a vital pathway to employment authorization for SIJ youth, threatening
Page 4 of 7
allow youth with SIJ to safely and productively support themselves, avoid exploitative environments, pursue e
been found by juvenile courts to have experienced abuse, abandonment, neglect or something similar. Witho
may exploit them. "The number of forcibly displaced people the world over has more than doubled in the last
USA (May 12, 2025). An EAD has an incredible impact on SIJ youth, creating a lifechanging domino effect to liv
the meantime. One SIJ youth featured in a National Immigration Project report shared, "[When I get my gree
damaged throughout all of these years, especially psychologically. It's just a lot of stress and I just feel numb.
mistreatment, or even trafficking, SIJ youth are vulnerable to trauma and re-traumatization.
The lack of a valid EAD also makes it challenging for individuals to access education, healthcare, housing plac
stabilize their lives. Because EADs are a form of federal identification and count as a REAL ID, they allow indiv
internships, scholarships, and educational programs. By cutting off access to employment authorization, the
protections, risks re-traumatization, and prevents youth from building independent, dignified lives. This decis
from increased vulnerability to trafficking, houselessness, unemployment, to a lack of medical coverage or st
Page 5 of 7
c. The Elimination of SIJ Deferred Action Undermines the National Interest of the United States
USCIS's planned revision to Form G-325A misaligns with U.S. economic interests and humanitarian commitme
abandons vulnerable youth who have already demonstrated eligibility for permanent relief through both judi
SIJ recipients who receive Employment Authorization Documents significantly contribute to the legal labor fo
concerning due the current labor market conditions. The Associated Builders and Contractors trade associati
Filling US Labor Shortages, New Data Finds," Anna Shepperson, American Immigration Council (July 2, 2024).
Today, workforce participation remains below pre-pandemic levels, with 1.7 million Americans missing from t
removal of EADs for SIJ recipients is in direct contradiction with the government's ongoing efforts to address
Form G-325A form revision will remove employment authorization from some workers; and prevent new pote

The team at Innovation Law Lab writes to express our opposition to USCIS's proposed changes to the Form G-325A, reflecting the end of Deferred Action for children and youth who have been approved for Special Immigrant Juvenile Status (SIJS).

Innovation Law Lab ("Law Lab") is a nonprofit organization dedicated to advancing immigrant and refugee justice through data-informed advocacy and community-centered support. Since its founding in 2014, Law Lab has provided advocacy and direct representation to thousands of immigrants across the country. The organization works to protect the rights of individuals facing detention and deportation, expand access to legal representation, and promote due process. As part of that work, Law Lab frequently represents children and youth in their SIJS cases, supporting them through complex legal processes and advocating for policies that protect their safety and stability.

The termination of Deferred Action for SIJS youth strips important protections from some of the most vulnerable children in the immigration system. Deferred action has long served as a vital safeguard, offering SIJS youth protection from deportation and the ability to work lawfully while awaiting their visas. Ending this policy abandons children who have already been found by state courts to be victims of abuse, neglect, or abandonment, leaving them without protection and forcing them into prolonged legal and economic instability. This abrupt policy shift undermines the very purpose of SIJS to provide humanitarian relief and will expose children to increased risks of exploitation, poverty, and trauma.

Eliminating Deferred Action for SIJS youth exposes vulnerable children to the very dangers the SIJS program was designed to prevent: detention, deportation, and separation from caregivers. These young people have already been found by both state courts and USCIS to be victims of abuse, neglect, or abandonment, and unfit to return to their countries of origin. Yet without deferred action, they are at immediate risk of being removed from the United States while they wait for a visa to become available. The government's claim to prioritize child safety rings hollow when it simultaneously strips protections from children it has already deemed to need humanitarian relief. The consequences are not hypothetical: SIJS youth have already been detained and depo
undermines the purpose of the SIJS program to offer a path to safety and permanency for immigrant children in the United States.

As just one of very many examples, Edgar (not his real name) fled a violent childhood in South America, where he was abandoned by his father shortly after birth. His mother abused him and his siblings and abandoned them shortly thereafter. Passed around between different relatives, Edgar went from one dangerous living situation to the next, until, as a teenager, he ended up living on the street, where he was threatened and harmed by a violent gang. After seeking safety in the United States, he struggled to maintain school enrollment because a relative forced him to work to pay for food and rent. After a local community member became his guardian, and he was granted SIJS deferred action, he has thrived: he graduated from high school, is pursuing college, and has started a successful small business. None of this would have been possible without the safety and stability that deferred action provided him after a highly unstable and unsafe childhood.

Access to employment authorization through deferred action is a lifeline for SIJS youth, protecting them from exploitation and opening doors to stability, opportunity, and selfsufficiency. Without it, these young people are forced into the shadows of the labor market, where they are especially vulnerable to wage theft and unsafe working conditions. Employment authorization not only allows SIJS youth to work lawfully, but also to pursue education, begin careers, and access critical services that require government-issued ID. For many SIJS youth, the ability to earn an income is the only way to afford college or vocational training, and to support themselves as they await a visa to apply for lawful permanent residency. Stripping them of these opportunities delays their development and isolates them from their peers. Taking away EAD eligibility does not just deny SIJS youth economic opportunity, it leaves them at risk of labor

Thank you so much

Thank you so much for your help

Thank you so much for your help

Thank you so much

I strongly oppose these changes, particularly the fact that much more information is being sought for deferre
it will dissuade families where one person is undocumented from applying for immigration benefits that they

Attachment Files

https://downloads.regulations.gov/
USCIS-2005-0024-0126/
attachment_1.pdf

https://downloads.regulations.gov/
USCIS-2005-0024-0089/
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