



MARYKNOLL OFFICE FOR GLOBAL CONCERNS  
*Peace, Social Justice and Integrity of Creation*  
[www.maryknollogc.org](http://www.maryknollogc.org)

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5107 Leesburg Pike, Suite 1800, Falls Church, VA 22041

Office of Information and Regulatory Affairs,  
Office of Management and Budget,  
725 17th Street NW, Washington, DC 20503;  
Attention: Desk Officer, U.S. Citizenship and Immigration Services, DHS

July 13, 2020

**RE: RIN 1125-AA94 or EOIR Docket No. 18-0002, Public Comment Opposing Proposed Rules on Asylum, and Collection of Information OMB Control Number 1615-0067**

The Maryknoll Office for Global Concerns submits this comment urging the Department of Justice and Department of Homeland Security to withdraw the proposed asylum rules in their entirety.

As an office representing Maryknoll missionaries – Catholic priests and brothers, sisters, and lay missionaries working with vulnerable people around the world – we unequivocally object to this proposed rule. Having worked directly with asylum seekers at the U.S.-Mexico border for decades, Maryknoll missionaries know well how these policies will adversely affect those they accompany. In addition, Maryknoll missionaries work in countries from which asylum seekers flee, bearing witness to the desperation with which people leave their homelands.

These rules will effectively shut down the asylum system, denying some of the world’s most vulnerable people the opportunity for protection from persecution. They thereby explicitly violate our moral and religious obligations to shelter the oppressed and welcome the stranger. In addition, they fly in the face of U.S. obligations under domestic and international law.

Heidi Cerneka, a Maryknoll Lay Missioner working as an immigration attorney at the U.S.-Mexico border, explains that this new rule will “narrow those who would qualify for asylum down to nobody.” Reflecting on the asylum seekers for whom she has provided legal counsel, including those who have won asylum, she remarked that she “cannot think of a single client who would qualify for asylum under the new rules.”

The proposed asylum rules are specific and targeted, restricting access to asylum for those who are most likely to need it, including those fleeing gang violence (violence from non-state actors and violence from

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gangs at the behest of police) or gender-based violence in Central America. The rules would eviscerate due process for asylum seekers and will place impossible burdens on them to prove their worthiness for asylum, including for those who have been tortured. The vast majority of asylum seekers do not have legal representation and must navigate the complex categories of who is eligible for asylum by themselves.

These rules have left us wondering what the role and purpose of the U.S. asylum system is if it is narrowed so tightly and made so convoluted. Why have an asylum system if it will screen out most of those who are deserving? By creating impossible hoops for asylum seekers and attorneys to jump through to win asylum, these rules will destroy the U.S. asylum system in the long-term.

Our position on this proposal is rooted in our moral duty to respond with mercy and compassion to those who seek our help. The Catholic Church, through its thousands of social service agencies and ministries, stands ready, willing, and able to serve as an alternative to detention and to uphold a robust asylum system. We ask for the opportunity to live out our faith by supporting our brothers and sisters coming to our borders fleeing violence. We urge you to comprehend the damage this proposal will cause and to rescind this rule immediately.

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