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Submitted via www.regulations.gov

October 19, 2021

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RE: RIN 1615-AC67; Public Comment on Proposed Rules on Procedures for Credible Fear Screening and Consideration of Asylum, Withholding of Removal, and CAT Protection Claims by Asylum Officers

Dear Acting Chief Strano and Assistant Director Alder Reid:

This comment on the proposed rules on procedures for credible fear screening and consideration of asylum and related protection claims is submitted by Denise Gilman and Elissa Steglich, Co-Directors of the Immigration Clinic at the University of Texas School of Law. We have extensive experience with direct representation of detained and non-detained asylum seekers at all stages of the process, including credible fear screenings, Immigration Court merits hearings, appeals, and Asylum Office affirmative proceedings. We have particularly robust experience with asylum proceedings involving women detained at the T. Don Hutto Detention Center in Taylor, Texas. Our comment relies heavily on our experience at the Hutto facility and does not address all components of the proposed regulations.

Through this comment, we urge the Department of Homeland Security (DHS) and Department of Justice (DOJ) (collectively, the Departments or the agencies), to redraft these proposed rules with a view to adopting a truly non-adversarial asylum process that recognizes the needs of protection seekers and provides full due process, specifically including access to counsel and language access. We appreciate that the proposed regulations emphasize a non-adversarial proceeding for asylum seekers and seek to streamline and facilitate asylum proceedings. However, implementation of a non-adversarial process within the contours of expedited removal and detention and without full-fledged review of an asylum office decision is inefficient, unnecessarily harmful to asylum seekers, and unlikely to provide fair and accurate results. The proposed rules treat asylum seekers arriving at the U.S. southern border as potential threats to be presumptively excluded,

except in rare instances where they successfully navigate the enforcement-based system. This approach runs counter to U.S. and international law norms that envision a meaningful protection system that covers all who qualify, even when those numbers become larger in times of human rights crisis in countries of origin.

We urge the agencies to reconfigure the asylum adjudication process to recognize asylum seekers as vulnerable individuals who are granted a panoply of rights under U.S. and international law and who may merit permanent protection in this country. Multiple proposals have suggested an affirmative process that does not rely on expedited removal and detention and that provides for full Immigration Court review of negative decisions.¹ We respectfully request that the agencies adopt one of those options rather than further investing in the enforcement-based approach of the proposed regulations. The approach of the proposed regulations is not a good fit with the current reality that arrivals at the border are predominantly viable asylum seekers. Nor does it further the government's interest in and obligation toward creating an efficient and fair adjudication process. If the agencies deem it appropriate, a new affirmative process could be applied only to some subset of arrivals at the border at least initially (e.g. arrivals that are likely to be asylum seekers given the human rights context in their particular countries of origin or families), which would be consistent with the recognition in the proposed regulations that a new system cannot be applied to all asylum seekers immediately.² Limited application of a true affirmative system would constitute a step in the right direction rather than a reaffirmation of an outdated and troubled enforcement-based approach to asylum seekers at the border.

I. General Considerations – An Enforcement-Based Approach is Unfair and Inefficient

The proposed regulations embed the new adjudication system for asylum seekers arriving at the border within expedited removal.³ As a result, the proposal also necessarily assumes detention for most individuals during the asylum proceedings. In fact, the comments to the proposed regulations -and the proposed regulations themselves- presume detention as collateral to the use of expedited removal. They state that detention is mandatory “during the credible fear screening process and during the process for further consideration of the protection claims on their merits.”⁴ While the proposed regulations expand the potential bases for release during the credible fear screening process,⁵ they make clear that this change is not to expand release options for asylum seekers generally but rather to expand the agencies' ability to place *families* in expedited removal

¹ See, e.g., Refugees International, Addressing the Legacy of Expedited Removal: Border Procedures and Alternatives for Reform (May 13, 2021), <https://www.refugeesinternational.org/reports/2021/5/11/addressing-the-legacy-of-expedited-removal-border-procedures-and-alternatives-for-reform> Asylum seekers could be placed in removal proceedings but then allowed to pursue asylum through the affirmative process during which time the proceedings could be administratively closed. The regulations could be amended to eliminate exclusive Immigration Court jurisdiction over asylum applications in such instances. See 8 C.F.R. 208.2(b). As an alternative available without any regulatory change, the Immigration Courts could terminate removal proceedings without prejudice upon filing of an asylum application. In this way, the Asylum Office could assume jurisdiction over the adjudication of the application. If asylum were not granted, a new Notice to Appear could be filed, as occurs with affirmative asylum applications, and the Immigration Court could reassert jurisdiction over the case.

² See 86 Fed. Reg. 46922 (indicating an intention to apply to asylum-seeking family units arriving in certain southwest border sectors initially).

³ See 86 Fed. Reg. 46909.

⁴ 86 Fed. Reg. 46913; see also Proposed 8 CFR 235.3, 86 Fed. Reg. 46946.

⁵ See 86 Fed. Reg. 46910; Proposed 8 CFR 235.3, 86 Fed. Reg. 46946.

since families cannot be detained for lengthy periods by law.⁶ In other words, the new provisions do not in any way promote a policy of release but instead ensure that additional persons can be put in the enforcement-based expedited removal process.

In addition, by creating a proceeding entirely within the INA 235 expedited removal statute rather than placing asylum cases into Immigration Court proceedings under INA 240, the regulations eliminate the possibility of Immigration Court review of detention under the procedures and standards that existed prior to the Attorney General's decision in *Matter of M-S-*, 27 I&N Dec. 509, in 2019.⁷ Overall, the proposed regulations make the use of expedited removal and detention of asylum seekers more likely, even though both have been severely critiqued when applied to asylum seekers.⁸

In doing so, the proposed regulations make it exceedingly difficult for asylum seekers to win protection under the statute even with the creation of a new affirmative process. As described below, the credible fear process carried out in detention already screens out valid asylum claims, and an asylum process carried out in that same context will undoubtedly do the same. It is simply too difficult for asylum seekers to present their claims effectively on a short timeline from within detention. Further, as discussed below, detention can never provide the language access and opportunity to engage legal counsel necessary to comport with due process obligations.

At the same time, the proposed regulations do not gain the efficiencies in adjudication and cost savings that would inure if affirmative asylum proceedings took place outside of the context of expedited removal and detention. Critically, the proposal still requires an asylum office credible fear screening interview with the possibility of credible review by the Immigration Court before merits proceedings on the asylum claim can occur. The proposal thus envisions consideration of asylum claims by the asylum office on two separate occasions with possibly two reviews by the Immigration Court. The proposal neither adopts a long-suggested solution of allowing for grants of asylum at the credible fear interview stage,⁹ nor does it eliminate the credible fear step so that cases may proceed directly to the merits before the asylum office.¹⁰ Rather than streamlining the process, the proposed rules essentially add a new layer of asylum office adjudication. The additional step creates new inefficiencies and opportunities for error while prolonging detention. In addition, the emphasis on expedited removal and accompanying detention is likely to maintain or increase extremely high levels of unnecessary spending on detention.¹¹

⁶ See 86 Fed. Reg. 46910.

⁷ See *Matter of X-K*, 23 I&N Dec. 731 (BIA 2005) (providing for Immigration Court review of detention for non-arriving aliens who passed a credible fear interview and were placed into INA 240 removal proceedings).

⁸ See, e.g., USCIRF, *Barriers to Protection: The Treatment of Asylum Seekers in Expedited Removal*; USCIRF, *Assessing the U.S. Government's Detention of Asylum Seekers: Further Action Needed to Fully Implement Reforms* (April 2013); UNHCR, *Progress on the Global Strategy Beyond Detention: United States* (2016), <https://www.unhcr.org/57b584153>.

⁹ See USCIRF, *Report on Asylum Seekers in Expedited Removal Vol. I: Findings and Recommendations* 66 (2005), https://www.uscirf.gov/sites/default/files/resources/stories/pdf/asylum_seekers/Volume_I.pdf.

¹⁰ See MPI, *The U.S. Asylum System in Crisis: Charting a Way Forward* (2018),

<https://www.migrationpolicy.org/sites/default/files/publications/MPI-AsylumSystemInCrisis-Final.pdf>.

¹¹ See GAO, [Immigration Detention: Actions Needed to Improve Planning, Documentation, and Oversight of Detention Facility Contracts](https://www.gao.gov/products/gao-21-149) 1 (Jan. 2021) <https://www.gao.gov/products/gao-21-149> (noting expenditures of approximately \$3 billion on detention in recent years).

II. Problematic Realities of Asylum Proceedings Taking Place within Detention – The Hutto Example

Our experience at the Hutto detention center demonstrates the impossibility of carrying out full and fair proceedings from within the expedited removal and detention systems. If the agencies will nonetheless transition to a non-adversarial model of asylum adjudication with a limited role for the Immigration Courts within the expedited removal and detention context, they must include in the regulations numerous safeguards to ensure that all stages of the adjudication are completed with fairness, dignity, and due process. They must consider the reality of the situation presented at facilities like Hutto as described in this section.

Hutto is a detention center run by for-profit company CoreCivic. More than 500 women may be detained there at a time, and the facility has almost exclusively held women seeking asylum for most of its history as a detention center for women, beginning in 2009.

Access to counsel has been and remains limited at Hutto. The facility is in a rural area. Visitation hours are limited (8 hours on weekdays and 4 hours on weekends). The limited visitation hours apply for attorney calls and televideo meetings as well. Currently, in-person legal meetings are non-contact.¹² Attorneys must speak with clients through a thick glass wall using a dedicated line or must sit in one cubicle and yell through plexiglass to the client sitting in another cubicle. Attorneys and clients cannot review or sign documents without sharing those documents with a guard who passes them back and forth.

The non-contact visit arrangement does not allow for use of telephonic interpretation, which is often necessary given the language diversity of the asylum-seekers at Hutto. For in-person attorney meetings requiring outside interpretation, the facility's make-shift accommodation has been to place counsel in one clear, plexiglass cubicle and the client in another, non-adjacent cubicle with an interpreter conferenced in on the telephone lines used in each cubicle.¹³ While waiting for interpretation, attorney-client communication can only be accomplished by yelling across the room between the cubicles. The cubicles themselves are not confidential, and facility guards monitoring the visitation area can overhear private attorney-client conversations.

Given the tight timelines for credible fear proceedings, most women do not have the opportunity to consult with an attorney before the interview. Women often receive no advance notice of the date and time of the credible fear interview even though the interview generally takes place weeks after they are taken into custody. Women are simply summoned from their detention cell or common space directly into the credible fear interview. As such, they are often disoriented during the interview and do not have adequate time to prepare mentally for the high stakes proceeding. For those few women who can secure counsel before the interview, the attorney is generally not able to appear in person with the client given the lack of advance notice.

¹² While contact visitation had been possible in previous years, under the Biden Administration, the Hutto facility has imposed greater restrictions on access to counsel. The contact visits were also problematic, since they were not in confidential areas.

¹³ Phone access is not provided in every cubicle. It is not always possible to speak with a client through an interpreter on a particular visit when the cubicles with phone lines are already in use.

Credible fear interviews at Hutto are conducted by telephone with the Houston Asylum Office. Many interviewers are men. The asylum officer cannot see the asylum seeker or her reactions to questions. The asylum seeker cannot see the asylum officer interviewing her and hears only a disembodied voice asking probing questions. The asylum seeker must reveal highly sensitive and traumatic information to an individual she has never met or seen. The interpreter is also telephonic and is another disembodied and unfamiliar voice. Many interpreters are men. Absent any ability to read body language or gestures, the asylum-seeker has little reason to trust in the process, and the asylum officer easily misses cues of trauma or lack of understanding.

Language access is a serious concern. DHS often finds it difficult to secure interpreters for less common languages, including Haitian Creole and Lingala as well as indigenous languages from Guatemala, leading to lengthy delays in the credible fear proceedings and problems with the quality of interpretation. Many clients have reported that the interpreter in the credible fear interview did not appear to understand the testimony or the questions of the asylum officer. Women regularly complain that their testimony is cut off to allow for interpretation without an opportunity to continue. Women report that they are told to keep their answers short for purposes of interpretation and that they feel silenced. The credible fear interviews are not recorded, so there is no means of monitoring the extent to which interpretation issues lead to errors in the asylum officer's understanding of the answers provided in the interview.

During credible fear interviews at Hutto, women sit in see-through plexiglass cubicles within a large room where other meetings may be taking place, including attorney-client meetings as described above. At least one guard is present in the room. The cubicles do not ensure any level of audio or visual confidentiality. Other asylum-seeking women and their visitors, as well as the guards, may hear parts or all of the asylum seeker's responses during the credible fear interview. In addition, everybody in the room can see the asylum seeker. We have personally visited the facility on many occasions where we could see women hunched over a telephone crying while participating in a credible fear interview. The physical environment affords no privacy or dignity during the high-stakes credible fear screening process.

Given these conditions, many women do not share their full experiences in the credible fear interview. We are aware of multiple recent cases (at least five in the last six weeks) in which women from Haiti were too ashamed, confused, and fearful to reveal incidents of gang rape and violent sexual assaults during their credible fear interviews.

Language access challenges plague the review process as well. All of the credible fear paperwork – notice of decision and accompanying worksheet with the asylum officer's transcript of the credible fear interview – is in English. Although these documents are filed with the Immigration Court for purposes of review hearings, the asylum seeker has no meaningful ability to examine or challenge the documents if unrepresented. In the hundreds of cases we have assisted, a high percentage of women identified mistranslations, misunderstandings or omissions from the worksheets once they were interpreted.

Immigration Court proceedings for women detained at Hutto, including credible fear review proceedings, are also devoid of any in person interaction with the adjudicator. All hearings take place by video teleconference (VTC). The immigration judges sit in San Antonio while the asylum seeker sits in a closet-size room at the Hutto detention facility where they see only a portion of the courtroom on the video screen in front of them. The room where the asylum seeker sits during

hearings is so small that the asylum seeker cannot be accompanied by more than one person in that room. It is therefore impossible for two attorneys to sit with the client during the hearing, resulting in almost all of the asylum seekers being separated from counsel, should they have any, at critical stages. For women who have been confined and tortured, whether by domestic abusers or by their governments, the room can be a traumatic place to provide testimony. The video connection is often poor and regularly cuts out. We have participated in hearings where the screen pixelated for the immigration judge and/or for the client. We have participated in hearings where the video cut off as the asylum seeker described sexual violence.

Interpretation in these Immigration Court video proceedings is deeply problematic. The interpreter may be in the courtroom with the immigration judge or on the telephone over a speaker set up in the courtroom. It is often very challenging for the asylum seeker to hear the interpretation of the questions that were originally asked in the courtroom. It is also difficult for the interpreter to hear the testimony of the asylum seeker offered over video from within the detention center. The recordings of hearings often do not include the testimony in the native language, because it is so hard to hear that it is not captured in the record. As a result, there is no means for correcting errors in interpretation. The conditions do not allow for meaningful participation in Immigration Court proceedings.

As with credible fear interviews, the women at Hutto are given little to no notice of Immigration Court review hearings. The San Antonio Immigration Court will often open the case in the EOIR system and schedule review hearings for later that same day or the following day. Women are simply told that they have court as they are being led to the hearing room in the facility. Counsel receive no notice, because they cannot appear in the EOIR system until *after* the case is entered into the system, which is generally the moment when the hearing is set. Only counsel with the ability to monitor the EOIR system multiple times daily will have notice of review proceedings. By operation, both asylum seeker and counsel are kept ignorant of the proceedings, which under the proposed regulations would become the final plea for safety.

III. Specific Necessary Changes Should the Proposed Framework be Adopted

Should the framework for asylum adjudication set out in the proposed regulations be adopted, specific modifications must be made to preserve due process and respect for asylum seekers. These modifications are described in this section. However, even if the modifications are included in the final rule, they would not resolve the overriding concern with an enforcement-based framework that emphasizes expedited removal and detention for asylum seekers.

A. Detention Should be the Exception and Access to Counsel Must be Guaranteed

If the proposed framework is adopted, the final regulations must include a presumption against detention for asylum seekers. The proposed regulations assume detention for asylum seekers arriving at the southern border even as they include one additional discretionary basis for parole from detention.¹⁴ Yet, detention makes it nearly impossible for asylum seekers to assert their protection needs effectively, as our experience at Hutto demonstrates. In addition, presumptive

¹⁴ See 86 Fed. Reg. 46913; see also Proposed 8 CFR 235.3, 86 Fed. Reg. 46946

detention of asylum seekers violates international refugee and human rights law, and there is no need for such detention.¹⁵

The regulations at 8 C.F.R. 235.3(b) should be modified to emphasize release from custody at the earliest possible stage of proceedings. Previous policies, while not consistently implemented, have emphasized that parole is presumptively appropriate for asylum seekers.¹⁶ Such a policy should be incorporated into the regulations, including the possibility of parole at any time, even before the credible fear interview. Parole eligibility should not be contingent on credible fear proceedings or a certain outcome in those proceedings. Oversight mechanisms, including individualized justification by the agency and independent court review of that justification, should be put in place to ensure that detention is only used where the government has shown that it is strictly necessary in an individual case.

In addition, the regulations must ensure meaningful access to counsel for those in immigration detention. The regulations at 8 C.F.R. 235.3(b)(4)(ii), 8 C.F.R. 208.9, 8 C.F.R. 208.2(a)(1)(ii), and 8 C.F.R. 1208.2 must set out requirements for readily accessible confidential attorney/client meeting spaces, as well as confidential free telephone and televideo communication options. They must ensure that restrictions on visitation (e.g., limited visitation hours, requirements of advance notification of visits, clearance requirements) are kept to a bare minimum. The rules must also incorporate oversight mechanisms to ensure that access to counsel is meaningful.

B. Additional Procedural Guarantees Must be Put in Place at the Asylum Office

If the asylum office will play a larger role in the adjudication of claims presented by protection seekers arriving at the U.S. southern border, then substantial adjustments must be made to the office's functioning in the expedited removal and detention context. Those changes must be incorporated into the regulations. Changes to the credible fear interview take on new importance since the results of that interview will become the asylum application. In addition, robust protections are needed to ensure that asylum office adjudication of the merits of claims respect due process.

All asylum office interviews, whether at the credible fear stage or on the merits, must be held in person. The asylum officer must be in the same room with the asylum applicant. There should be a preference for in-person interpretation as well. The interviews must be held in a confidential space where neither the asylum applicant nor the asylum officer can be heard or seen by any person not involved in the interview. These protections should be incorporated into the regulations at 8 C.F.R. 235.3(b)(4)(ii), 8 C.F.R. 208.9, 8 C.F.R. 208.2(a)(1)(ii), and 8 C.F.R. 1208.2.

¹⁵ See Ingrid Eagly & Steven Shafer, *Measuring In Absentia* Removal in Immigration Court (Jan 28, 2021), <https://www.americanimmigrationcouncil.org/research/measuring-absentia-removal-immigration-court?emci=b7fee08c-8b61-eb11-9889-00155d43c992&emdi=ea000000-0000-0000-0000-000000000001&ccid=>; UNHCR, *Detention Guidelines* (2012), <https://www.unhcr.org/en-us/publications/legal/505b10ee9/unhcr-detention-guidelines.html>.

¹⁶ See *Parole of Arriving Aliens Found to have a Credible Fear of Persecution or Torture* (Dec. 8, 2009), https://www.ice.gov/doclib/dro/pdf/11002.1-hd-parole_of_arriving_alien_found_credible_fear.pdf. Of concern, rare language speakers placed in INA 240 proceedings due to an inability to provide competent interpretation in credible fear procedures have been ineligible for parole under the policy.

Additional guarantees must be incorporated into those regulatory provisions. DHS must provide at least 48 hours advance notice in the language of the asylum seeker and English before any credible fear interview. This requirement will allow the asylum seeker to prepare for the interview and to secure the appearance of counsel where counsel has been retained. Continuance for securing or the appearance of counsel during any credible fear or merits interview must be established as a default. Oversight mechanisms should be implemented to ensure that asylum seekers do not feel coerced to proceed with interviews absent counsel. Additional notice of at least two weeks is required before a merits interview to ensure time for preparation and submission of additional evidence.

Asylum officers must be specifically trained on a regular basis regarding country conditions in the countries of origin from which asylum seekers arrive. For example, the Hutto detention center currently detains a significant number of women from Haiti and Nicaragua. Asylum seekers assigned to conduct interviews of any kind at the facility must receive substantial updated training regarding conditions in those countries. Asylum officers should be directed to use country condition information to elicit full testimony from asylum seekers. For example, given the prevalence of gender-based violence in Haiti and the degree of violent government repression of protesters in Nicaragua, asylum officers should ask protection seekers whether they experienced these harms. There should be no presumption against recognition of asylum for individuals who form part of a significant flow of asylum seekers from a particular country since large numbers of applicants may indicate the severity of the situation in the home country.

The regulations should provide at 8 C.F.R. 208.9(b) and 8 C.F.R. 208.9(g)(2) that the asylum office must ensure that there is *prompt* access to an interpreter in any language in which interpretation may be necessary. The asylum office will likely need to dedicate additional resources to ensure that such interpreters are available. Asylum officers should take time to ensure that the interpretation is adequate. In addition, the asylum officer should explain to the interpreter and the applicant what the interpreter's role will be.

The regulations should provide at 8 C.F.R. 208.9(f) that all interviews, whether for credible fear or on the merits, should be recorded. The recording should capture questions and answers in the language in which they are initially spoken as well as the interpreted version. The recording must be made available to the asylum seeker and any counsel. Similarly, 8 C.F.R. 208.9 should provide that any documents that will be submitted to the Immigration Court or made part of the record for future proceedings must be translated into the asylum seeker's best language and made available to her. Any adjudication documents must similarly be made available in the asylum seeker's best language. Where literacy is limited, the asylum office shall read, through an interpreter if necessary, and record any of the above-listed documents. The recording must be made available to the asylum seeker. If detained, the facility must make available space, time and technology, for the asylum seeker to listen privately to asylum-related recordings.

Asylum officers should take sufficient time with each credible fear interview or merits adjudication. In order to conduct a credible fear screening and gather sufficient information to serve as an asylum application, the credible fear interview will likely take more than two hours. The merits interviews will require significantly more time. The regulations at 8 C.F.R. 208.9 should reflect this reality.

Counsel must be allowed to participate in all credible fear and merits interviews. The regulations at 8 C.F.R. 208.9 must be modified to replace the current language that allows counsel to comment only at the end of the proceeding. The regulations must ensure that counsel may intervene as needed at the credible fear stage to ensure that full and correct information for the screening and the asylum application is offered and recorded.

C. Additional Procedural Guarantees Must be Put in Place at the Immigration Court

If the new asylum adjudication framework is adopted, longstanding issues with Immigration Court adjudication in the detention context must be resolved in the regulations. In addition, the regulations at 8 C.F.R. 1003.48 should be modified to provide for genuine *de novo* review of merits adjudications by the asylum office.

The regulations should clarify at 8 C.F.R. 1208.30(g) that counsel, if retained, may participate in the credible fear review before the Immigration Judge. Under current procedures, Immigration Judges do not always offer counsel an opportunity to comment or provide information during credible fear review proceedings. In addition, the regulations should provide that the credible fear review must be recorded, which does not always occur under current procedures. Recording and intervention of counsel become critical when the stakes of the credible fear screening become even higher as is the case under the proposed regulations.

All asylum proceedings before the Immigration Court, whether at the credible fear or merits stage, should be in person. The proposed regulations at 8 C.F.R. 1208.30(g) and 8 C.F.R. 1003.48(e) must be modified to this effect. It is challenging enough for detained asylum seekers to participate effectively in the proceedings; they should not be further alienated from the process through the use of video technology. Technical problems with video technology also make its use in the asylum context inappropriate and inefficient. Wherever possible, interpreters should be in person as well to ensure greater accuracy in the interpretation and a clear record for review.

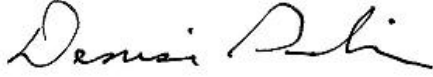
Finally, and critically, Immigration Court proceedings on the merits should be genuinely *de novo* to ensure fair and accurate adjudications. The regulations at 8 C.F.R. 1003.48(e) must guarantee a genuine opportunity to offer evidence and additional testimony to allow for meaningful decision-making on the asylum claim. In our experience, Immigration Judges regularly overturn negative findings by the asylum office where they allow additional testimony, briefing and evidence. It simply is not possible in all cases for asylum seekers to present all the information, legal analysis, and evidence necessary for a favorable decision in the short period of time envisioned for asylum office adjudication. In addition, because of limited availability of counsel, attorneys regularly enter a case only at the Immigration Court stage. Counsel entering before the Immigration Court should have a full opportunity to present the case to ensure an informed final decision.

IV. Conclusion

We appreciate the opportunity to provide our comments on the proposed regulations. We urge the agencies to carry out a more complete reform of adjudication for asylum seekers arriving at the southern border that will allow for fair and efficient adjudication outside of the expedited removal and detention context. Should the agencies adopt the proposed framework for asylum

adjudication within expedited removal, we highlight the need to make critical changes to the process.

Please do not hesitate to contact us if we can provide further information or analysis. Thank you for your attention.

A handwritten signature in cursive script, appearing to read "Denise Gilman".A handwritten signature in cursive script, appearing to read "Elissa Steglich".

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