



SISTERS OF THE GOOD SHEPHERD  
**NATIONAL ADVOCACY CENTER**  
*Rise Up AND Act for Justice*

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July 15, 2020

U.S. Citizenship and Immigration Services, Department of Homeland Security  
Executive Office for Immigration Review, Department of Justice

Re: Docket Number USCIS 2020-0013  
A.G. Order No. 4747-2020  
1125-AB08  
1615-AC57

On behalf of the Congregation of Our Lady of Charity of the Good Shepherd and our mission partners, we express opposition to the above propose rule that would have the Department of Homeland Security and the Department of Justice “consider emergency public health concerns based on communicable disease due to potential international threats from the spread of pandemics when making a determination as to whether ‘there are reasonable grounds for regarding [an] alien as a danger to the security of the United States’ and, thus, ineligible to be granted asylum or the protection of withholding of removal in the United States under Immigration and Nationality Act.”

This rule change effectively would bar asylum seekers from the United States from countries dealing with Covid-19, which is hitting Central and South America this summer. This proposal uses fear as a weapon to keep out those people who already have experienced much trauma, fear and deprivation.

In light of the official federal government efforts to re-open the country, in particular re-open businesses, sports and schools, our borders should re-open too. Frankly, the juxtaposition of keeping the U.S. borders sealed shut while simultaneously promoting a re-opening of society during the pandemic is telling and troubling.

The United States has nothing to fear from immigrants and asylum-seekers. Indeed, they are the foundation of our country’s strength. Most Americans know this. They bring grit, determination, creativity, passion, hope, entrepreneurship.

The National Advocacy Center of the Sisters of the Good Shepherd (NAC) educates and advocates on social justice issues for the transformation of society to the benefit of all people. NAC reflects the spirituality, history and mission of the Congregation of Our Lady of Charity of the Good Shepherd and Partners in Mission. NAC advocates at the federal level for people living in poverty, immigrants, survivors of human trafficking, survivors of domestic abuse and other vulnerable populations.

The Sisters of the Good Shepherd was founded in France in 1835 and are in 70 countries on 5 continents and have had a presence in the United States for over 175 years. With a presence in 22 states and 1 U. S.

Territory, the Sisters and their Lay Mission Partners have dedicated themselves to serving girls, women and families who experience poverty, exploitation, vulnerability and marginalization.

Let us expand the U.S. successes and our success stories.

Thank you for the opportunity to submit these comments. Blessings on your work.

Sincerely,

Lawrence E. Couch  
Director  
National Advocacy Center of the Sisters of the Good Shepherd