



CITIES *for* ACTION

October 23, 2024

The Honorable Neera Tanden
Director
Domestic Policy Council
1650 Pennsylvania Avenue NW
Washington, DC 20504

The Honorable Alejandro Mayorkas
Secretary
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Avenue, SE
Washington, DC 20528

The Honorable Ur Jaddou
Director
U.S. Citizenship and Immigration Services
5900 Capital Gateway Drive
Camp Springs, MD 20588

RECEIVED

By ESEC at 2:41 pm, Oct 23, 2024

Dear Director Tanden, Secretary Mayorkas, and Director Jaddou:

The undersigned 44 Cities for Action local leaders respectfully request that your administration prioritize eliminating work permit processing delays and protect eligible immigrants' ability to obtain a longer automatic extension of their work permit applications. These actions will avert preventable harm to our cities and localities, regardless of the outcome of the presidential election. **During the last months of this calendar year, we urge you to eliminate the work permit backlog and further extend work permits to provide stable access to work permits for years to come.**

Eliminating the Work Permit Backlog. Processing delays hurt cities and counties, as eligible workers are forced to wait months or over a year to join the workforce. In 2023, [more than 50 mayors and county executives](#) called on your administration to end processing delays for work permit applications. We submitted detailed recommendations to remedy the work permit backlog in light of the historic labor shortages our communities and businesses faced. [Labor shortages](#) persist in [multiple industries](#) such as healthcare, education, construction, and hospitality. Nevertheless, the work permit backlog has since worsened, reaching [over 1.6 million](#) pending applications as of March 2024.

Eliminating the work permit backlog is critical for our cities and counties — and for the [U.S. economy](#) as a whole. We renew our call for your administration to end these processing delays by devoting sufficient agency resources to work permit processing within the coming months so as to avert an impending crisis.

Further Extending Work Permits. Cities and counties will soon face great challenges if immigrants and asylum seekers lose their jobs, driver's licenses, and access to food, health care and housing in 2025. Your administration rightly issued a [temporary final rule](#) that extended work authorization for many asylum seekers and immigrants applying to renew their work permits. However, your projections estimate that without further action, [260,000](#) eligible individuals will still experience a lapse in employment authorization despite the 540-day extension. Gaps in employment are particularly disruptive for our cities and counties, with workers suddenly losing their ability to provide their own food, housing, and healthcare due to processing delays. These gaps in turn strain our local services and economy. As the current work permit extension rule is set to expire come October 2025, hundreds of thousands more could lose work authorization.

Therefore, we urge you once again to finalize the extension period for work permit renewals and provide for a 730-day extension period that will cover all eligible workers while they await their work permit renewals, including the estimated 260,000 individuals who are not currently protected by the 540-day extension. As we noted in [February 2024](#), finalizing and expanding the validity period of work permits before year's end aligns with your administration's [goals](#) and will preserve agency resources needed to speed up processing and avert the harmful gaps in employment that will hurt our cities and counties.

* * *

Without immediate action, hundreds of thousands of immigrants and asylum seekers will face unnecessary delays to join the workforce or renew their work authorization. We applaud your administration for providing pathways to lawful employment to over [half a million](#) mixed status families. This executive action, along with welcomed Temporary Protected Status designations and extensions, will boost our local economies and help address some of the critical labor shortages our communities face. However, these announcements will prove meaningless if the current work permit backlog worsens and the automatic extension lapses and continues to leave workers behind. That is why we implore you to allocate the necessary resources to eliminate this backlog and finalize and expand the automatic extension.

Sincerely,

1. *Board Chair Emma Pinter, Adams County, CO*
2. *Mayor Kirk Watson, Austin, TX*
3. *Mayor Jesse Arreguín, Berkeley, CA*
4. *Mayor Marty Grohman, Biddeford, ME*
5. *Mayor Michelle Wu, Boston, MA*
6. *Mayor Aaron Brockett, Boulder, CO*

7. *Mayor Pro Tem Nicole Speer, Boulder, CO*
8. *Boulder County Commissioner Marta Loachamin, Longmont, CO*
9. *Chairman Ashley Stolzmann, Boulder County, CO*
10. *Councilmember and Commissioner Heidi Henkel, Broomfield, CO*
11. *City Council Member Kenny Van Nguyen, Broomfield, CO*
12. *Councilmember Paloma Delgadillo, Broomfield, CO*
13. *Mayor Brandon Johnson, Chicago, IL*
14. *Mayor Mike Johnston, Denver, CO*
15. *Commissioner Wendy Jacobs, Durham County, NC*
16. *El Paso County Commissioner David C. Stout, Precinct 2, El Paso, TX*
17. *Councilmember John J. Bauters, Emeryville, CA*
18. *Mayor Joseph V. Schember, Erie, PA*
19. *Mayor Letty Hardi, Falls Church, VA*
20. *Mayor Robert Cantelmo, Ithaca, NY*
21. *Mayor Quinton Lucas, Kansas City, MO*
22. *Mayor Rex Richardson, Long Beach, CA*
23. *Mayor Jacob Frey, Minneapolis, MN*
24. *Mayor Eric Adams, New York, NY*
25. *Mayor Ras J. Baraka, Newark, NJ*
26. *Mayor Alix Desulme, North Miami, FL*
27. *County Executive David Coulter, Oakland County, MI*
28. *Mayor Ed Gainey, Pittsburgh, PA*
29. *Mayor Brett P. Smiley, Providence, RI*
30. *Mayor Melvin Carter, Saint Paul, MN*
31. *Mayor Erin Mendenhall, Salt Lake City, UT*
32. *Mayor Todd Gloria, San Diego, CA*
33. *Mayor London Breed, San Francisco, CA*
34. *Mayor Alan Webber, Santa Fe, NM*
35. *Mayor Bruce Harrell, Seattle, WA*
36. *Mayor Jeffrey Slavin, Somerset, MD*
37. *Mayor Katjana Ballantyne, Somerville, MA*
38. *Mayor James Mueller, South Bend, IN*
39. *Mayor Georgine Welo, South Euclid, OH*
40. *Mayor Tishaura O. Jones, St. Louis, MO*
41. *Parish President Sam Jones, St. Mary Parish, LA*
42. *Mayor John Erickson, West Hollywood, CA*
43. *Mayor David Morse, Westbrook, ME*
44. *Board Member Destinee Ortiz, Will County, IL*



**U.S. Citizenship
and Immigration
Services**

December 4, 2024

Emma Pinter
Cities for Action
epinter@adcogov.org

Dear Ms. Pinter:

Thank you for your October 23, 2024 letter to the Department of Homeland Security (DHS) and U.S. Citizenship and Immigration Services (USCIS). I am responding on behalf of the Department and USCIS.

USCIS has prioritized the processing of both initial and renewal Forms I-765, Application for Employment Authorization, to ensure that noncitizens eligible to work or eligible to request employment authorization in the United States get a timely decision and, if approved, receive their employment authorization document (EAD) as quickly as possible. USCIS recognizes the importance of employment authorization and documentation for eligible noncitizens and their families, as well as for the U.S. businesses and organizations that employ them. USCIS has significantly reduced the processing times for Form I-765 applicants and remains committed to exploring further efficiencies for EAD processing. So far, this fiscal year, the typical wait time for adjudication of the Form I-765 is three months. For certain asylum applicants and parolees, the median average processing time is 30 days.

USCIS also continues to identify ways to improve the employment authorization process for noncitizens through policy and regulatory changes. As you mentioned, in April 2024, USCIS published a temporary final rule¹ to increase the automatic extension period for certain renewal EADs from up to 180 days to up to 540 days. We hope to finalize this rule in the near future after a careful review of comments we have received. Furthermore, we have implemented policy changes to minimize the risk of applicants contending with gaps in their employment authorization and/or documentation, including increasing the employment authorization validity period to five years for certain employment eligibility categories. USCIS appreciates the concerns outlined in your letter and is committed to supporting the productivity and security of immigrant workers and maintaining the positive impact they have on our country and economy.

¹ See <https://www.uscis.gov/i-9-central/temporary-final-rule-to-increase-employment-authorization-and-or-employment-authorization-document>.

Emma Pinter
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Thank you again for your letter and interest in this important issue. Please share this response with the other Cities for Action local leaders that cosigned your letter. Should you wish to discuss this matter further, please do not hesitate to contact the USCIS Public Engagement Division by email at public.engagement@uscis.dhs.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ur M. Jaddou", with a long horizontal flourish extending to the right.

Ur M. Jaddou
Director