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September 13, 2024

Director Neera Tanden
Domestic Policy Council
1600 Pennsylvania Avenue NW
Washington, DC 20500

Secretary Alejandro Mayorkas
U.S. Department of Homeland Security
3801 Nebraska Avenue NW
Washington, DC 20016

Director Ur Jaddou
U.S. Citizenship and Immigration Services
20 Massachusetts Ave NW
Washington, DC 20001

RECEIVED
By ESEC at 1:36 pm, Oct 16, 2024

Dear Director Tanden, Secretary Mayorkas, and Director Jaddou:

As a lawyer that has focused on the construction industry for my over 45 years of practice, I respectfully request your prompt and careful attention to the growing work permit backlog, which is endangering economic growth and adversely impacting state and local industries and communities across the United States. **During the final months of this calendar year, we urge you to address the work permit backlog by prioritizing the processing of initial and renewal work permit applications. This will enable more workers to get to work and give business owners the assurance that their workforce can continue contributing for years to come.**

As a construction attorney that works with many construction industry employers throughout the Intermountain West, I understand that a robust workforce is a critical asset. We need to insure businesses have the necessary talent to foster resilient communities and thriving economies. And yet, talented and eager immigrant workers are unable to participate in the job market because they must wait for over a year to obtain work authorization or renew their work authorization with the U.S. Citizenship and Immigration Services (USCIS). Localities across the country are feeling the effects of the current and chronic labor shortages, which vary significantly across different industries, and our immigration system's lack of efficiency in work permit processing is hurting our businesses and the U.S. economy. **Given demographic shifts, immigrant workers are needed to fill these critical gaps.** Business leaders have warned that, amidst continuing low unemployment, the demand for labor far exceeds the available workforce. If every single unemployed person was hired, there would still be 1.34 million unfilled jobs, according to the Critical Labor Coalition. This is due in part to our aging workforce combined with a shrinking pool of workers. Immigrants, however, are 16.4 percent more likely to be of working age than their U.S.-born counterparts, allowing them to more readily fill these dire workforce needs. **Immigrant workers are and will continue to be essential to U.S. economic growth and competitiveness for years to come.** According to Federal Reserve Chair Jerome Powell, "a big part of

the story of the labor market coming back into better balance is immigration returning to levels that were more typical of the pre-pandemic era.” Increased numbers of immigrant workers have helped [stave off a recession](#) and boost our economy, with the U.S. [outperforming our peers](#) around the world despite the unprecedented threat posed by the pandemic. The nonpartisan Congressional Budget Office estimates that increased immigration will swell the U.S. economy by [\\$7 trillion](#) over the next decade and reduce the U.S. national debt by [\\$900 billion](#) — an undeniable testament to the importance of the immigrant workforce for our collective livelihood.

Processing work permit applications quickly has a direct positive impact on maintaining and growing immigrants’ invaluable contributions to the U.S. workforce. Their talent and skills make the United States [more competitive](#) at a global level and help fill shortages in [critical industries](#) such as healthcare, education, construction, and hospitality. **That is why I urge you to take immediate action to eliminate the work permit backlog and provide stable access to work permits for years to come.**

Sincerely,

BABCOCK SCOTT & BABCOCK, P.C.



Robert F. Babcock



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

November 20, 2024

Robert Babcock
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Dear Mr. Babcock:

Thank you for your September 13, 2024 letter to the Department of Homeland Security (DHS). I am responding on behalf of the Department.

USCIS is committed to the continuous introduction of process efficiencies and technology improvements to reduce its backlogs and this includes the Form I-765, Application for Employment Authorization. We reduced our overall backlog by 15 percent in Fiscal Year 2023, which was the first time in over a decade that the agency was able to do so.¹ For Fiscal Year 2024, we anticipate this trend to hold as we compile and analyze our data from the last 12 months.

USCIS has improved the processing of the Form I-765, both new applications and renewals, to ensure that people 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 so they can support their families, enhance their communities, and contribute to our economic strength. USCIS has implemented technological and operational solutions to reduce the processing times for EADs and remains committed to exploring further efficiencies for EAD processing.

USCIS also continues to identify ways to improve the employment authorization process. For example, in April 2024, USCIS published a temporary final rule to increase the automatic extension period for certain EADs from 180 days to 540 days. 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 urgency of your letter and is committed to supporting the productivity and

¹ See USCIS website, “New USCIS Data Shows Progress on Reducing Backlogs, Customer Experience, Employment-based Immigration, Naturalization, and Humanitarian Work,” available at <https://www.uscis.gov/newsroom/stakeholder-messages/new-uscis-data-shows-progress-on-reducing-backlogs-customer-experience-employment-based-immigration-0>

Mr. Robert Babcock

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security of immigrant workers and maintaining the positive impact they have on our country and economy.

Thank you again for your letter and interest in this important issue. 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", followed by a long horizontal flourish.

Ur M. Jaddou
Director