CLASP
The Center for Law and Social Policy

November 28, 2025

Paul Buono
Chief, Business and Foreign Workers Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: DHS Docket No. USCIS–2025–0271, Removal of the Automatic Extension of Employment Authorization Documents

Dear Chief Buono,

The Center for Law and Social Policy submits this comment opposing in the strongest possible terms the October 30, 2025 Interim Final Rule ("2025 IFR") eliminating automatic extensions of Employment Authorization Documents ("EADs"). The 2025 IFR unlawfully reverses DHS's nearly decade-long policy choice of providing automatic EAD extensions; ignores ongoing adjudication delays and economic evidence; disregards reliance interests that DHS itself recognized less than a year ago; rejects feasible alternatives; and relies solely on an unsupported security rationale all while unlawfully bypassing notice-and-comment. The result is a rule that will destabilize the workforce, disrupt employer operations, and inflict severe harm on workers and their families solely due to government processing delays. **DHS must withdraw the IFR in full.**

I. Organizational Interest

Established in 1969, **The Center for Law and Social Policy, otherwise known as CLASP,** is a national, non-partisan, non-profit, anti-poverty organization that advances policy solutions for people with low incomes. With deep expertise in a wide range of programs and policy ideas, longstanding relationships with anti-poverty, child and family, higher education, immigration, workforce development, and economic justice stakeholders, and over 50 years of history, CLASP works to amplify the voices of directly-impacted workers and families and help public officials design and implement effective programs. CLASP also seeks to improve job quality for low-income workers. That includes increasing wages and providing access to paid sick days, paid family and medical leave, and stable work schedules. Quality jobs enable individuals to balance their work, school, and family obligations – promoting economic stability as well as career advancement.

We work with and advocate for hundreds of immigrants including refugees and those seeking asylum, immigrants with Temporary Protected Status (TPS), H-2A and H-1B workers each year who depend on uninterrupted employment authorization to support their families, secure housing, pay for transportation and medical care, and remain productive members of the workforce. Employers rely on these workers to meet staffing needs, comply with labor obligations, and avoid costly turnover—consistent with DHS's own findings that interruptions in work authorization cause "substantial and unnecessary harm," *see* Increase of the Automatic Extension Period of Employment Authorization for Certain Renewal Applicants, 89 Fed. Reg. 101,208, 101,209 (Dec. 13, 2024) ("2024 Final Rule"), and that automatic EAD extensions "lead to less turnover costs for U.S. employers." *See* Retention of EB–1, EB–2, and EB–3 Immigrant Workers and Program Improvements Affecting High-Skilled Nonimmigrant Workers, 81 Fed. Reg. 82,398, 82407 (Nov. 18, 2016) ("2016 Final Rule").

Renewal requests already make up a large portion of all pending work permits within certain categories. In fact, 75 percent of TPS recipients and prima facie eligible applicants' pending work permit applications are all renewal requests. Following, all pending work permit requests that are renewal requests are 70 percent withholding protection under the Convention Against Torture, 60 percent are asylum applicants, and 58 percent are H-1B skilled worker spouses.[1]

Hundreds of thousands of immigrant workers depend on work authorization. For TPS eligible families alone, approximately 827,640 workers risk losing their work authorization, while 385,853 workers have children and 106,128 have children under 5 years old.[2] Withdrawing the automatic work permit extension will put these workers out of work and threaten the deportation of their families. The interim final rule would have devastating consequences for families and children, increasing their risk of falling into poverty and experiencing housing and food insecurity. The terminations of work authorization will disrupt lives, splinter families, and foster widespread psychological distress among immigrant communities. In fact, the mental health burden of migration-related stress disproportionately affects racial and ethnic minority groups, exacerbating existing health inequities.[3] In addition to the mental health impacts of expiring work permits or family income, families experience financial strain with losing access to jobs and employer sponsored health care. In sum, the 2025 IFR directly harms the workers and families we serve and undermines our mission to serve communities that are at risk of falling into poverty.

II. The 2025 IFR Inexplicably Reverses Two Final Rules, Ignoring Economic Evidence and Operational Realities

The 2025 IFR inexplicably reverses DHS's Previous Final Rules. DHS's 2025 IFR contravenes Congress's mandate that the agency ensure "the overall economic security of the United States is not diminished by efforts . . . aimed at securing the homeland." 6 U.S.C. § 111(b)(1)(F). Consistent with this statutory mandate, DHS concluded less than a year ago that a 540-day automatic EAD extension was necessary to prevent employment lapses caused by USCIS delays and to protect employers and workers. 2024 Final Rule, 89 Fed. Reg. at 101,208. Indeed, DHS previously found that even the 180-day extension established under the 2016 Final Rule "does not provide USCIS enough time" to avoid harmful gaps in work authorization. *Id.* at 101,209–10. Yet the 2025 IFR eliminates extensions entirely—imposing consequences DHS recently deemed economically harmful and operationally unworkable. This reversal in policy–without new evidence or a reasoned

explanation–violates the Administrative Procedure Act ("APA"). *See FCC v. Fox Television Stations*, 556 U.S. 502, 515 (2009).

The 2025 IFR also ignores that backlogs persist today and provides no projections or plans to reduce the backlogs that necessitate automatic extensions. The 2025 IFR incorrectly portrays backlogs as a mere future "scenario," 2025 IFR, 90 Fed. Reg. at 48,816, 48,818, but in reality, processing delays remain significant. DHS's most recent data show that more than 165,000 EAD renewal applications have been pending for over 180 days, confirming that lapses in authorization remain a present problem, not a hypothetical future "scenario." *See* U.S. Citizenship & Immigr. Servs., *I-765, Application for Employment Authorization*, *Counts of Pending Petitions by Days Pending For All Eligibility Categories and (c)(8) Pending Asylum Category as of June 30, 2025* (Fiscal Year 2025, Quarter 3), available at https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data). Only months ago, DHS found that persistent adjudication delays required a permanent 540-day extension. 2024 Final Rule, 89 Fed. Reg. at 101,210–12. The 2025 IFR offers no new evidence that would alter the agency's recent conclusion. Furthermore, DHS, in the 2016 Final Rule, emphasized that the automatic EAD extension would "allow the movement of resources" in situations where the agency faced higher than expected filing volumes. 2016 Final Rule, 81 Fed. Reg. at 82,407. In the 2025 IFR, the agency fails to meaningfully discuss how the agency plans to address current and future EAD processing backlogs as it removes this critical agency tool.

The 2025 IFR's assertion that renewal applicants' "proper planning" could avoid lapses is false and ignores operational realities. Both in its 2024 Final Rule and 2025 IFR, DHS acknowledges that USCIS's backlogs and resulting lapses in employment authorization are not the fault of EAD renewal applicants. *See* 2024 Final Rule, 89 Fed. Reg. at 101,209; 2025 IFR, 90 Fed. Reg. at 48,817. Yet the 2025 IFR repeatedly and incorrectly states that "proper planning" by renewal applicants could avoid gaps in employment authorization. 2025 IFR, 90 Fed. Reg. at 48,819–10, 48,819. If "proper planning" means filing more than six months early, then DHS ignores that although USCIS may accept EAD renewals filed more than 180 days before expiration, the agency issues overlapping—not consecutive—validity periods, effectively cutting into the card's usable time and forcing applicants into an ever-earlier renewal cycle. The 2025 IFR fails to acknowledge this problem or propose a workable alternative of issuing consecutive validity periods for very early-filed renewal applications. Moreover, EAD renewal applicants cannot "properly plan" for every unforeseen circumstance that may affect USCIS's processing times. Indeed, the 2016 and 2024 Final Rules were issued for the explicit purpose of addressing unforeseen circumstances that neither the agency nor applicants could reasonably anticipate. 2016 Final Rule, 81 Fed. Reg. at 82,407; 2024 Final Rule, 89 Fed. Reg. 101,210.

The 2025 IFR ignores the reality of continued high demand for work authorization and instead rests on assumptions that are plainly incorrect. DHS is wrong to "expect[]" that EAD renewal filings will "substantially decline" simply because this Administration attempted to terminate the Cuban, Haitian, Nicaraguan, and Venezuelan ("CHNV") parole program and several countries' TPS designations. *Cf.* 2025 IFR, 90 Fed Reg. at 48,809. Many people who first came through CHNV and similar parole programs, or who previously had TPS, have now applied for asylum or other protections that still require EAD renewals. These applications are not going away; they are simply moving into different categories. Additionally, the termination of the CHNV parole program and the TPS designations have all been challenged in court and none of those lawsuits have reached final

judgment. If these terminations are reversed, parolees and TPS beneficiaries will continue applying for EAD renewals. Accordingly, DHS must plan for continued high renewal volumes, not pretend they will disappear.

The 2025 IFR provides no economic impact analysis and does not reconcile its current position with DHS's recent determination that automatic extensions yield substantial economic benefits. Despite having engaged in economic analysis less than a year ago on this same issue, the 2025 IFR asserts DHS "cannot quantify" the economic impacts of eliminating automatic EAD extensions—even as the agency bypasses notice-and-comment, which would have produced relevant data. *See* 5 U.S.C. §§ 553(b)–(c). DHS likewise ignores its own recent economic analysis showing billions of dollars in economic benefits from automatic extensions, including approximately $10 billion in stabilized earnings, $3.5 billion in employer savings, and $1.1 billion in tax revenue. 2024 Final Rule, 89 Fed. Reg. at 101,210–12.

The 2025 IFR offers no updated or contrary economic analysis and instead relies on speculative concerns, including a remittances theory that collapses under DHS's own data. As DHS acknowledges, foreign-born workers constitute roughly 20% of the U.S. civilian workforce. 2025 IFR, 90 Fed. Reg. at 48,815. By DHS's own logic, eliminating automatic extensions does not simply affect individual households or hypothetical outflows abroad, it disrupts up to one-fifth of the U.S. labor force, and the U.S. employers, tax revenues, and economic activity tied to that workforce. The reality, which DHS recently recognized in the 2024 Final Rule but ignores now, is that eliminating automatic extensions risks widespread workforce destabilizations, higher employer turnover costs, and reduced tax revenue.

Foreign-born workers are employed across industries in the U.S. economy, including service occupations, construction, transportation, and manufacturing, making their roles in the labor force vital to the economy.[4] In fact, just on TPS holders alone, 95,000 work is leisure and hospitality, 90,000 in construction, 85,000 in business services, 80,000 in Wholesale and retail trade, and 70,000 in manufacturing.[5] Without immigrant workers, the U.S. economy will experience labor shortages. A study found that the decrease of 2 million immigrant workers between 2019 and 2021 had a detrimental impact on several industries, including hospitability, healthcare, construction, and agriculture. [6]In terms of economic contributions, immigrants contribute a significant amount to the country's economy. According to the Congressional Budget Office, immigrants will add $7 trillion to the economy over the next years.[7] This is in line with other estimates that show that TPS holders alone contribute $40 billion in the national GDP within a decade. In addition, according to the American Community Survey, immigrants paid $382.9 billion in federal taxes and $196.3 billion in state and local taxes in 2022.[8]

In short, the IFR abandons DHS's statutory duty to safeguard U.S. economic security, ignores important aspects of the agency's ongoing backlogs that necessitate automatic extensions, and disregards DHS's own recent evidence. The agency cannot lawfully reverse its position without justification. The IFR should be withdrawn.

III. **The 2025 IFR Ignores Significant Reliance Interests**

The 2025 IFR also disregards the significant reliance interests that DHS itself reaffirmed less than a year ago when it issued a permanent 540-day automatic extension, and which have existed since

the agency's issuance of the 2016 Final Rule. For nearly a decade, USCIS has automatically provided an extension of some length to some groups of workers with expiring EADs. *See* 2016 Final Rule, 81 Fed. Reg. at 82,455. In the 2024 Final Rule, DHS invited stakeholders to rely on a permanent 540-day extension and explicitly sought comment on making the extension permanent to provide regulatory certainty and workforce stability. 2024 Final Rule, 89 Fed. Reg. at 101,230. Employers and workers reasonably structured hiring, staffing, payroll planning, and employee retention around that assurance.

Additionally, the only reliance interests DHS barely acknowledges—but does not meaningfully consider—are those of immigrants and their employers. Yet, DHS entirely failed to consider the reliance interests of other stakeholders who rely on regulatory stability preventing immigrant communities from suffering government-caused lapses in employment authorization. These other stakeholders include state, city, and local governments; entire regional economies; educational institutions; healthcare providers; legal and social service providers; and the broader public, among others.

DHS cannot now abruptly withdraw the permanent 540-day automatic extension without addressing these significant reliance interests. Doing so violates core administrative law principles. *Dep't of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 30 (2020) (agency must meaningfully consider reliance interests when abandoning prior policy). In short, DHS invited workers, employers, families, schools, service providers, and communities to rely on regulatory stability, then pulled the rug out from under them without explanation. DHS failed to properly consider these significant reliance interests when issuing the 2025 IFR.

IV. The 2025 IFR's "Security and Vetting" Rationale Is Unsupported by Evidence, Internally Inconsistent, and Constitutionally Concerning

The 2025 IFR rests on a single asserted justification: the desire to complete vetting and security checks before approving an individual's work permit renewal. *See* 2025 IFR, 90 Fed. Reg. at 48799–800, 48803, 48806–17, 48819. DHS offers no other policy rationale for eliminating automatic extensions. DHS's sole rationale suffers from numerous problems and reveals a significant mismatch between the concern asserted and the real-world purpose and impact of automatic extensions. *See Dep't of Com. v. New York*, 588 U.S. 752, 755 (2019) (decisionmaking arbitrary and capricious where there was "a significant mismatch between" the agency's decision and the sole rationale provided for it).

DHS's security theory contradicts its recent findings that automatic extensions do not pose security concerns. DHS's new, unsupported security theory in the 2025 IFR stands in stark contrast to DHS's 2024 Final Rule, which did not identify any adverse impact of automatic extensions on USCIS's ability to conduct security checks. *See generally* 2024 Final Rule. This conclusion is intuitive: individuals who have already submitted extensive biographic and biometric information, been previously vetted and approved to work, established lives and employment in the United States, and are seeking only to continue working lawfully are among the least likely to pose security risks. DHS has not provided any evidence or otherwise explained why it now abandons its own recent conclusion. The 2025 IFR also ignores that DHS narrowly tailored the automatic extensions to certain applicants who applied for EAD renewals (1) in the same category of eligibility as the initial request and (2) on a timely basis, which "reasonably assured" the agency that the individual

remained eligible for employment authorization and protected the program from abuse. *See* Retention of EB–1, EB–2, and EB–3 Immigrant Workers and Program Improvements Affecting High-Skilled Nonimmigrant Workers, 81 Fed. Reg. 81,900, 81,927 (December 31, 2015). The 2025 IFR simply ignores DHS's previous reasoning when it claims that automatic extensions pose security concerns.

DHS's theory that automatic extensions hamper security vetting lacks evidentiary support. The 2025 IFR identifies no evidence that automatic extensions have compromised security, nor any data showing that eliminating extensions would meaningfully enhance screening. Indeed, for nearly ten years, millions of EAD holders have worked under automatic extensions. Yet the 2025 IFR provides no statistics showing that this system allowed security risks to persist or resulted in later security-based denials. The absence of any such evidence demonstrates that the purported problem does not exist. In support of its security theory, DHS cites only a single incident without showing it involved an automatic extension or explaining how eliminating automatic extensions would have prevented it. And even if there were any connection to automatic extensions, a single anecdote cannot substitute for evidence, particularly when weighed against millions of law-abiding workers who file timely EAD renewal applications and submit themselves to regular vetting and security checks. DHS's notion that an otherwise-authorized worker must be preemptively stripped of the ability to work because they might someday collect money to send abroad to fund "nefarious activities," *see* 2025 IFR, 90 Fed Reg. at 48,806, 48,808, 48,810, 48,813, 48,815, is speculative in the extreme. *Compare* 2025 IFR, 90 Fed. Reg. at 48,807 ("over one million [noncitizens were] granted employment authorization in under one year"), *with id.* at 48,808–09, 48,813–14 (repeatedly citing a single incident involving a noncitizen in Boulder, Colorado to justify wholesale reversal of automatic extension policy).

DHS's security theory contradicts its belief that applicants will not face backlogs in the future. DHS's reasoning is internally inconsistent, a hallmark of arbitrary and capricious decisionmaking. The agency says it does not expect USCIS to experience delays in processing EAD renewals in the future, but also says it must end automatic extensions on EADs now because it needs more time to finish security checks and cannot consistently finish them fast enough. Both cannot be true. If DHS "expects" to process work-permit renewals on time, 2025 IFR, 90 Fed. Reg. at 48809, 48813 n.136, then automatic extensions do not cause any problem and there is no reason to end them. But if DHS expects delays, which are the current reality, then ending automatic extensions will push employees out of work authorization simply because the government cannot finish adjudicating these cases fast enough. Courts invalidate rules like this when an agency's reasoning is contradictory and the agency offers no adequate justification for the inconsistency. *See F.C.C. v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009) (agency must provide detailed justification when "its new policy rests upon factual findings that contradict those which underlay its prior policy; or when its prior policy has engendered serious reliance interests that must be taken into account"); *Motor Vehicle Mfrs. Ass'n v. State Farm*, 463 U.S. 29, 43 (1983) (agency must provide a reasoned analysis for its rule).

Vetting EAD renewal applicants based on their ideological beliefs is not a lawful rationale for new policy. The 2025 IFR further implies that DHS must assess or vet renewal applicants for whether they "bear hostile attitudes" toward the "citizens, culture, government, institutions, or founding principles" of the United States—a position that raises serious First Amendment concerns. 2025

IFR, 90 Fed. Reg. at 48807. That constitutionally suspect approach cannot justify depriving employment-authorized workers of the ability to support themselves and their families. *See, e.g.*, 5 U.S.C. § 706(2)(B) ("reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . contrary to constitutional right"); *Dep't of Com. v. New York*, 588 U.S. 752, 755 (2019) (decision making arbitrary and capricious where there was "a significant mismatch between" the agency's decision and the sole rationale provided for it).

In sum, DHS relies on security concerns as its sole justification for eliminating automatic extensions yet provides no evidence of any security problem. Speculation, circular logic, a single anecdote, and unconstitutional theories cannot substitute for facts or justify massive workforce disruption.

V. **The 2025 IFR Fails to Consider Feasible Alternatives**

DHS fails to meaningfully consider feasible, less disruptive alternatives, in violation of the APA.

Consecutive EADs. For instance, DHS claims that "proper planning" by renewal applicants could ensure no lapses in work authorization, yet this fails to recognize that DHS does not issue consecutive EADs. When individuals file well in advance of expiration, USCIS routinely issues overlapping validity periods rather than tacking the new approval onto the end of the existing authorization. As a result, early filers lose usable work-authorization time, forcing them into an ever-accelerating renewal cycle where they must apply earlier and earlier at significant personal and financial cost merely to maintain continuous work authorization.

Filing fees, legal fees, time off work to prepare filings, and the emotional and economic strain of constant renewal planning make this approach untenable and unsustainable. If DHS believed early filing was the solution, it was required to consider — and explain why it rejected — the alternative of issuing consecutive EAD validity periods so that applicants could file early without losing work authorization time and money. This straightforward fix would allow individuals to apply far in advance, provide USCIS with a longer adjudication window, and preserve the full period of authorized employment. DHS's failure to address this option underscores the inadequacy of its "proper planning" rationale and confirms that the agency did not meaningfully consider reasonable, less disruptive alternatives.

Concurrent vetting. Nor does DHS explain why it cannot simply continue to conduct vetting during the renewal process and deny renewal of employment authorization if "potential hits of derogatory information" arise—a process it already uses. 2025 IFR, 90 Fed. Reg. at 48,804 ("If the application is denied, the automatically extended employment authorization and/or EAD generally is terminated on the day of the denial."); *id.* at 48,806, 48,808–10 (citing concerns about "potential hits of derogatory information"). With or without the automatic extension, the individual remains in the United States; the only question is whether they are forced out of lawful employment while being vetted. In other words, DHS already has a system that protects security while letting people keep working, and it has not explained why it cannot keep using it.

Secure paper. DHS's concern that its own receipt notices are printed on "non-secure" or "plain" paper ignores an obvious solution: printing the extension notices on secure paper. *See* 2025 IFR, 90 Fed. Reg. at 48,809–10, 48,817 (concerns about automatic extension being memorialized on "non-

secure" paper).

By overlooking straightforward, commonsense solutions, the agency unfairly shifts the burden of government backlogs onto workers who have already been vetted and have navigated the arduous and costly process of obtaining their EADs. Workers will face increased administrative hurdles as they seek to understand new procedures, obtain needed documents, and apply for renewal. Such administrative burdens fall disproportionately on individuals who are already systematically marginalized, making it harder for eligible and vital workers to renew their EADs and participate in the economy. Rejecting practical alternatives in favor of a rule that will cause economic harm and worker displacement exemplifies arbitrary and capricious decision-making.

VI. DHS's Use of an Interim Final Rule is Unlawful

DHS made the 2025 IFR effective immediately, without providing the notice or opportunity to comment required by the APA. The agency's use of an interim final rule was unlawful.

First, DHS has not satisfied the "meticulous and demanding" standard for invoking the APA's "good cause" exception. *Sorenson Commc'ns Inc. v. FCC*, 755 F.3d 702, 706 (D.C. Cir. 2014) (citation omitted). That narrow exception allows an agency to bypass notice and comment only where it "for good cause finds . . . that notice and public procedure thereon are impracticable, unnecessary, or contrary to the public interest." 5 U.S.C. § 553(b)(3)(B). While DHS claims that notice and comment would be impracticable and contrary to the public interest, it relies almost entirely on the unsupported security rationale discussed above, along with stating it is "self-evident" that more workers would "rush" to apply for EAD renewals before the rule took effect. 2025 IFR, 90 Fed. Reg. at 48,813.

Again, DHS has not provided evidence of any security risks caused by automatic extensions. *Cap. Area Immigrants' Rts. Coal. v. Trump*, 471 F. Supp. 3d 25, 46 (D.D.C. 2020) (good cause exception not satisfied where agencies only provided a single example of potential adverse consequences and "offer[ed] no other data or information that persuasively supports their prediction of a surge" in border crossings before rule took effect). DHS therefore cannot satisfy the good cause exception to avoid notice-and-comment rulemaking.

Second, the 2025 IFR improperly relies on the exception for normal rulemaking involving the "foreign affairs function of the United States." 5 U.S.C. § 553(a)(1). This exception, too, comes with a "high bar." *Cap. Area Immigrants' Rts. Coal. v. Trump*, 471 F. Supp. 3d 25, 55 (D.D.C. 2020). Courts, in particular, have warned against "[t]he dangers of an expansive reading of the foreign affairs exception" in the immigration context, where inevitable "incidental foreign affairs effects" would "eliminate[] public participation in this entire area of administrative law." *City of New York v. Permanent Mission of India to United Nations*, 618 F.3d 172, 202 (2d Cir. 2010). DHS cannot meet that high bar here, as the potential effects on international relations that it puts forward are all speculative, tenuous, or otherwise reliant on unsupported claims of security risks. 2025 IFR, 90 Fed. Reg. at 48,814.

VII. Requested Action and Conclusion

For these reasons, DHS should withdraw the 2025 IFR in its entirety. The IFR contradicts DHS's

statutory mandate, its own 2016 and 2024 Final Rules, and the factual and economic record. It ignores constitutional concerns and will cause predictable, major harm to workers, families, employers, and the broader economy — all due to government processing delays.

Respectfully submitted,

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Center for Law and Social Policy

If you have questions, please contact us at lroque@clasp.org and dharris@clasp.org.

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[1] Adriel Orozco, *USCIS Ends Automatic Extensions for Most Work Permits, Placing Immigrant Workers and Employers in Limbo*, American Immigration Council, October 31, 2025, https://www.americanimmigrationcouncil.org/blog/uscis-ends-automatic-extensions-for-work-permits/

[2] Lulit Shewan, *Trump's Racist Attacks Against TPS Will Rip Apart Families, Harm Local Economies, and Endanger Thousands,* Center for Law and Social Policy, September 2025, https://www.clasp.org/publications/fact-sheet/trumps-racist-attacks-against-tps-will-rip-apart-families-harm-local-economies-and-endanger-thousands/

[3] *Ibid.*

[4] Kevin Appleby, *The Importance of Immigrant Labor to the US Economy,* Center for Migration Studies, September 4, 2024, https://cmsny.org/importance-of-immigrant-labor-to-us-economy/

[5] Amands Baran, Jose Magaña-Salgado, and Tom K. Wong, *Economic Contributions by Salvadorian, Honduran, and Haitian TPS Holders,* Immigrant Legal Resource Center, April 2017, https://www.ilrc.org/sites/default/files/resources/2017-04-18_economic_contributions_by_salvadoran_honduran_and_haitian_tps_holders.pdf

[6] Giovanni Peri and Reem Zaiour, *Labor Shortages and the Immigration Shortfall,* Econofact, January 11, 2022, https://econofact.org/labor-shortages-and-the-immigration-shortfall#:~:text=The%20shortfall%20of%20immigrants%20over%20the%20past%20two,the%20long-run%20effects%20on%20productivity,%20innovation%20and%20entrepreneurship.

[7] Congressional Budget Office, *The Budget and Economic Outlook: 2024 to 2034,* February 2024, https://www.cbo.gov/system/files/2024-02/59710-Outlook-2024.pdf

[8] Steven Hubbard, *Immigrants Contribute Billions to Federal and State Taxes Each Year,* American Immigration Council, April 15, 2024, https://www.americanimmigrationcouncil.org/blog/immigrants-contribute-billions-federal-state-taxes/