



February 28, 2026

Kristi Noem
Secretary
U.S. Department of Homeland Security
2707 Martin L. King Avenue SE
Washington, D.C. 20528

Dear Secretary Noem:

On behalf of H-STAT, an interprofessional graduate student advocacy organization dedicated to improving the health for people in Georgia, we appreciate the opportunity to comment on “Employment Authorization Reform for Asylum Applicants” (CIS No. 2799-25; DHS Docket No. USCIS-2025-0370) notice of proposed rule making (NPRM). H-STAT strongly opposes this proposed rule and the harm it would inflict on immigrant families’ health and stability. By creating barriers for asylum applicants to obtain work authorizations, both our country’s economy and health will suffer.

In delaying work authorizations to asylum applicants, we recognize that this will pull many families into poverty. With rising costs of living both in [Georgia](#) and across the [U.S.](#), many families will experience the immediate strain of being unable to afford basic necessities such as housing, food, and transportation. This economic hardship not only exacerbates stress and mental health challenges but also [increases reliance](#) on public assistance programs, placing additional burdens on already stretched community resources. Research has demonstrated that limited access to income and employment directly contributes to [food insecurity](#), [housing insecurity](#), and chronic stress: these factors are strongly associated with [poorer physical and mental](#) health outcomes. For children, in particular, these hardships can disrupt [educational attainment](#), [nutrition](#), and overall [child health](#), thus creating long-term consequences that extend far beyond the initial period of unemployment.

For many asylum applicants, they are unable to receive [federal benefits](#) for health coverage. As such, they must rely on employer-sponsored health insurance. Without the ability to work legally, asylum applicants cannot obtain this health coverage and must rely on [emergency care](#) and [underfunded community clinics](#). This gap in coverage reduces access to preventive care, chronic disease management, and mental health services, increasing the likelihood of [preventable illness and the spread of infection](#). With these combined effects, we can expect to see higher [long-term healthcare costs](#). Ensuring timely work authorization

allows families to both earn an income and secure health insurance, thus supporting both the individual and community.

In terms of the broader economic impact, these delays in work authorizations reduce the available workforce and limit the [financial contributions](#) from individuals eager to participate in the labor market. Without legal authorization, asylum applicants may be forced to seek informal employment, exposing them to unsafe [working conditions, wage theft, and labor exploitation](#). This places vulnerable workers at risk and undermines labor standards. Allowing timely work authorization enables asylum seekers to contribute legally and productively to local economies while reducing reliance on social safety nets.

Thank you for your consideration on the issue. We look forward to working with you to promote the health of Georgians. If you have any questions, please contact Nicholas Wilson at nicholas@healthstatgeorgia.org.

Sincerely,

Nicholas Wilson
H-STAT President
Health Students Taking Action Together (H-STAT)