



for every child

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### **Comment on Proposed Rule: Processing Asylum Seekers at the US-Mexico Border**

On behalf of UNICEF USA,<sup>1</sup> I am submitting this comment to raise UNICEF USA's opposition to the proposed asylum restrictions set forth in Docket No. USCIS 2020-0013; A.G. Order No. 4747-2020; RIN 1125-AB08 and 1615-AC57. In FY2019, 65% of apprehensions at the US-Mexico border included a child – some unaccompanied and others with family. **The data make it clear: asylum access is a children's rights issue.**

This harmful rule could result in the forced return of children and families to Central America and Mexico, where they will face the grave child protection risks they fled in the first place. Current U.S. border restrictions in response to COVID-19 are already causing children and families seeking safety and protection to be turned away from the southern U.S. border without proper due process. This rule as currently drafted could have an effect of further restricting access to protection measures for children.

I believe that every child must be safe and protected. UNICEF USA has advocated tirelessly for children's rights around the globe for more than 70 years with the conviction that children need to be seen as children, first and foremost – especially children who are fleeing for their lives.

While I understand that the United States must take measures to protect public health in this pandemic, I believe that the U.S. Government must protect the safety and best interests of all children, regardless of migration status, and that it is never in a child's best interests to be sent back to an unsafe situation.

The United States can and must protect migrant children, even while responding to the pandemic.

Sincerely,

A handwritten signature in black ink, appearing to read "MJN", written over a white background.

Michael J. Nyenhuis  
President & CEO, UNICEF USA

<sup>1</sup>UNICEF USA is an independent, U.S. nonprofit organization that supports UNICEF's global programs through fundraising, advocacy and education in the United States. It is funded through private contributions and receives no funding from the U.S. Government. For more information, visit [www.unicefusa.org](http://www.unicefusa.org).