



## **END SIJS BACKLOG COALITION GUIDANCE AND TEMPLATES FOR COMMENTING IN RESPONSE TO USCIS’S POLICY CHANGES ELIMINATING SIJS DEFERRED ACTION**

June 24, 2025

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This document provides guidance for organizations and individuals to submit comments to the United States Citizenship and Immigration Services (USCIS) on two recent agency actions that gravely harm young people with Special Immigrant Juvenile Status (SIJS): (1) a USCIS policy change, implemented through [revisions to the Policy Manual provisions on SIJS](#), that eliminates the SIJS Deferred Action Policy, and (2) proposed changes to [Form G-325A](#) that would eliminate requests for deferred action based on SIJS.

The Coalition strongly urges organizations and individuals who work with or care about the well-being of SIJS youth to submit comments to USCIS on both the Policy Manual changes and on the proposed changes to form G-325A . These comments make a public record of the harm these changes will cause and highlight broad public support for the SIJS Deferred Action Policy, which provided crucial permanency and stability to SIJS youth. You can submit the same comment, with small adaptations tailored to either the Policy Manual changes or the form change, via the two different processes described below.

We have provided two template comments. The first template is designed for organizations or individuals working with SIJS youth. The second template is a simplified template designed for

concerned individuals such as foster parents and allies. Our hope is that these templates encourage your participation in this important advocacy opportunity.

Please read on for instructions on how to submit comments to USCIS about these changes, for brief background information on the SIJS Deferred Action Policy and Form G-325A, and for our two templates.

Thank you for submitting these comments in solidarity with SIJS youth!

### *LOGISTICAL INSTRUCTIONS FOR SUBMITTING COMMENTS AND USING OUR TEMPLATES*

#### **1) Comments to USCIS Policy Manual changes eliminating SIJS Deferred Action**

- **Deadline: July 7, 2025 by 11:59PM ET\*\***

\*\*If you or your organization do not have capacity to complete a comment by the July 7 deadline for the Policy Manual change, USCIS [will still accept feedback](#) on the Policy Manual changes through the feedback inbox regardless of when the feedback is submitted. *If you miss this deadline, still submit! Please also forward us your submissions to [sijs@nipnlg.org](mailto:sijs@nipnlg.org) so that we can track these comments.*

- **How to submit:** Email your comment to [policyfeedback@uscis.dhs.gov](mailto:policyfeedback@uscis.dhs.gov). The email's subject line should include "Feedback on Policy Manual Updates Regarding SIJS Deferred Action, USCIS Policy Manual Vol. 6, Pt. J, Ch. 4.G."

#### **2) Comments to USCIS Proposed Revisions to Form G-325A**

- **Hard Deadline: July 28, 2025 by 11:59 pm ET.**
- **How to submit:** Submit your comment online [HERE](#); we encourage you to upload your comment as a PDF.

### *GUIDANCE ON DRAFTING YOUR COMMENTS*

It is best if each comment submitted is unique and focuses on the harm and the impact of the form revision and elimination of the SIJS Deferred Action Policy from your perspective. For this reason, **it is very important to individualize your comment, NOT merely copy and paste from the template comment.** Both templates indicate via yellow highlighted text areas where you might include your own analysis, anecdotes, or input. The organizational template flags areas you can cut for the Policy Manual comment. You may include some or all of the suggested sections, or create your own new ones; do not feel bound by the template's structure! This is only a guide after all!

A few pieces of general guidance:

- Focus on the harm this policy change will have on SIJS youth, their families, and their communities, as well as any harm it will cause your organization (if relevant)
- What makes your comment particularly powerful is the first-hand stories you can reference -- but **DO NOT** include any names or identifying information about a client.

- Avoid guessing at and attempting to rebut justifications that the government *might* have for these changes. Instead, focus on the harm these policy changes will cause. (E.g., “This rule will harm children and the communities they live in.”)
- Feel free to cite any case law, regulatory provisions, journal articles, scientific studies, or other reports that elucidate important, material issues that support retaining deferred action for SIJS youth.
- For individuals such as foster parents, speaking from your perspective about the harms to your family is very powerful, but **DO NOT** include any identifying information.
- Don’t let the perfect be the enemy of the good -- say as much as you have bandwidth and comfort to say. It’s important to register your opposition to the policy and form changes and a few reasons why.

### *BRIEF BACKGROUND ON SIJS DEFERRED ACTION AND FORM G-325A*

Since May 2022, young people with approved SIJS petitions who are awaiting a visa to apply for lawful permanent resident status have been protected from deportation and afforded work authorization through the [SIJS Deferred Action Policy](#), which has likely benefited well over 100,000 SIJS youth. This policy was created to protect and support SIJS youth who are trapped in a years-long legal limbo, unable to apply for the lawful permanent resident status they need due to the SIJS visa backlog. Under the SIJS Deferred Action Policy, when USCIS approved a young person’s SIJS petition, it automatically considered them for a 4-year, renewable, grant of deferred action if they lacked an available visa due to the SIJS visa backlog.

In 2024, USCIS amended [Form G-325A](#), a form used to request deferred action, to benefit SIJS youth by creating an SIJS-specific category on the form. USCIS explained that SIJS youth whose deferred action grants were expiring in 150 days or fewer could use the form to request a renewal of their deferred action; the form could also be used for young people with approved SIJS petitions to seek initial consideration for deferred action, if for some reason they did not receive a deferred action adjudication contemporaneously with their SIJS petition approval notice. Thousands of SIJS youth have deferred action expiration dates of May 2026, and thus, they were counting on using the Form G-325A process to apply for renewal starting in December 2025.

In April 2025, USCIS abruptly stopped granting deferred action to young people concurrently with their SIJS petition approval. Many young people in this situation then filed Form G-325A to request deferred action, but the Coalition is not aware of any young people whose Form G-325As have been granted since April 2025.

Then, on May 29, 2025, USCIS issued a proposed amended Form G-325A, which eliminates the SIJS category for requesting or renewing deferred action. There is no explanation accompanying the proposed changes. The proposed amended Form G-325A is available [here](#), and the proposed amended Form G-325A instructions are available [here](#) (and [this table of changes](#) shows the specific language USCIS is proposing to delete). The call for comments, which are due on July 28, 2025, can be found in the [Federal Register](#). The proposed changes to Form G-325A also eliminate deferred action categories for stateless individuals, as well as based on a labor investigation (the DALE program). If your organization also works with stateless individuals or

DALE recipients, we encourage you to include harms to those populations in your comment; [here is guidance on drafting comments](#) to discuss these groups.

On June 6, 2025, USCIS issued a [Policy Alert](#) rescinding the SIJS Deferred Action Policy, and simultaneously amended the [SIJS Policy Manual provisions](#) to remove the language about the SIJS Deferred Action Policy. The Policy Alert states that USCIS will no longer grant deferred action to SIJS youth, will no longer grant employment authorization to SIJS youth who already have deferred action, and will strip SIJS youth with deferred action of their ability to renew their deferred action period once it expires. USCIS accepts feedback on its Policy Manual changes through a dedicated email inbox; the [stated deadline](#) for giving comments on the changes eliminating SIJS deferred action is July 7, 2025.

Meanwhile, while USCIS is purportedly considering stakeholder comments to the proposed Form G-325A changes, the current Form G-325A remains on the USCIS website, giving the false impression that SIJS youth who complete the form are eligible for SIJS-based deferred action.

These policy changes expose SIJS youth not only to deportation, thwarting the intent of the U.S. Congress, but also to the risk of labor exploitation and other harms including mental health impacts of the fear and uncertainty these changes cause SIJS youth.

*END SIJS BACKLOG COALITION COMMENT TEMPLATES*

**HEADER FOR POLICY MANUAL COMMENT**

*Use these subject lines for your email and attached PDF comment letter, respectively*

**Email Subject Line:** Feedback from [X organization] on Policy Manual Updates Regarding SIJS Deferred Action, USCIS Policy Manual Vol. 6, Pt. J, Ch. 4.G

**Re:** Feedback from [X organization] on Policy Manual Updates Regarding SIJS Deferred Action, USCIS Policy Manual Vol. 6, Pt. J, Ch. 4.G

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**HEADER FOR FORM G325-A COMMENT**

*Add the below subject line and addressee to your comment*

**Re:** Comment from [X organization] on Docket ID USCIS-2005-0024; the Form G-325A Revision “Agency Information Collection Activities; Revision of a Currently Approved Collection: Biographic Information (for Deferred Action),” OMB Control Number 1615-0008

Jerry Rigdon, Acting Chief  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
U.S. Department of Homeland Security

Dear Mr. Rigdon:

## TEMPLATE 1: ORGANIZATION/INDIVIDUALS WORKING WITH SIJS YOUTH

*This template is designed for organizations or individuals working with SIJS youth. Please note that you may cut the flagged sections if you are adapting this template to comment on the Policy Manual change.*

[Organization/I] write to express my opposition to OMB Control Number 1615-0008, USCIS’s proposed revision of Form G-325A to exclude recipients of Special Immigrant Juvenile Status (SIJS). We also strenuously oppose the Policy Manual changes and accompanying Policy Alert that USCIS issued on June 6, 2025, which eradicates the SIJS Deferred Action Policy. Because the proposed Form G-325A changes and the USCIS Policy Manual changes eliminate SIJS deferred action, this comment will address the harmful impact of both and refer to them collectively as “the SIJS policy changes.” These changes will directly and severely harm children and youth, and in turn, families and communities that Congress specifically intended to protect. The SIJS policy changes eliminate deferred action and work authorization for SIJS-approved youth, putting them in danger of labor exploitation and deportation.

[Background on your organization/yourself: 1-2 sentences introducing yourself or your organization and any relevant experience, interest, or credentials. Include here a brief statement of your organization’s mission and interest in, or experience working with, immigrant children and SIJS-eligible youth, if applicable].

### **The SIJS Policy Changes Terminating Protections for Abused, Abandoned, and Neglected Children Are Contrary to the Purpose and Intent of the SIJS Statute.**

[Organization/I] strongly oppose[s] the SIJS policy changes, as they undermine the fundamental purpose of the SIJS provisions of the Immigration and Nationality Act (INA), enacted in 1990, to protect children who have suffered parental maltreatment and who would face harm if deported to their country of origin.<sup>1</sup> Congress’s purpose in creating SIJS was to afford vulnerable immigrant children who survived various forms of abuse, abandonment, or neglect from a parent a means to reside safely in the United States and ultimately obtain permanent resident status, giving them the permanency and stability they need to progress in their young lives.

Young people receive grants of SIJS only after satisfying a set of “rigorous, congressionally defined eligibility criteria,”<sup>2</sup> including having been placed by a juvenile court in the custody or guardianship of a U.S.-residing caregiver and having received a determination from a state juvenile court that it is not in their best interest to be returned to their country of origin. A child is granted SIJS only after DHS has exercised its statutory consent function,<sup>3</sup> thereby endorsing the juvenile court’s conclusion that the child should not be returned to their country of origin. USCIS has recognized the statute’s protective purpose, stating in the Policy Manual that Congress “created the special immigrant juvenile (SIJ) classification to provide humanitarian

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<sup>1</sup> 8 U.S.C. § 1101(a)(27)(J)(ii). SIJS recipients applying for adjustment of status are considered “to have been paroled into the United States.” 8 U.S.C. § 1255(h)(1).

<sup>2</sup> *Osorio Martinez v. Att’y Gen. U.S.*, 893 F.3d 153, 163 (3d Cir. 2018).

<sup>3</sup> 8 U.S.C. § 1101(a)(27)(J)(iii).

protection for abused, neglected, or abandoned alien children.”<sup>4</sup> The legislative history surrounding SIJS reflects the purpose of the statute to protect young people because “of their age and the impracticability of deportation.”<sup>5</sup>

Despite Congressional intent, a now years-long visa backlog prevents SIJS recipients from achieving the permanent protection Congress intended for them in a timely manner.<sup>6</sup> Until the creation of the SIJS Deferred Action Policy in May 2022, SIJS recipients were unable to access work authorization and were vulnerable to deportation despite both a juvenile court and DHS having affirmed their need for protection. USCIS created the SIJS Deferred Action Policy to further Congressional intent and remedy the impacts of the unforeseen SIJS visa backlog by protecting SIJS youth who were in a legal limbo for years and unable to access permanent protection merely due to a visa backlog.<sup>7</sup> In enacting the policy, USCIS stated,

Congress likely did not envision that SIJ petitioners would have to wait years before a visa became available, since for many years after implementation of the program, SIJs did have visas immediately available. Deferred action and related employment authorization will help to protect SIJs who cannot apply for adjustment of status solely because they are waiting for a visa number to become available. This process furthers congressional intent to provide humanitarian protection for abused, neglected, or abandoned noncitizen children for whom a juvenile court has determined that it is in their best interest to remain in the United States.<sup>8</sup>

Since May 2022, young people with approved SIJS petitions who are awaiting a visa to apply for lawful permanent resident status have been protected from deportation and afforded work authorization through the SIJS Deferred Action Policy, which has likely benefited well over 100,000 SIJS youth. Under the SIJS Deferred Action Policy, when USCIS approved a young person’s SIJS petition, it automatically considered them for a 4-year, renewable, grant of deferred action if they lacked an available visa due to the SIJS visa backlog. In 2024, USCIS amended Form G-325A, a form used to request deferred action, to benefit SIJS youth by creating an SIJS-specific category on the form. USCIS explained that SIJS youth whose deferred action grants were expiring in 150 days or fewer could use the form to request a renewal of their

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<sup>4</sup> USCIS Policy Manual, Vol. 6, Pt. J, Ch. 1,

<https://www.uscis.gov/policy-manual/volume-6-part-j-chapter-1>.

<sup>5</sup> Special Immigrant Status for Alien Foster Children: Joint Hearings on S. 358, H.R. 672, H.R. 2448, H.R. 2646, and H.R. 4165 Before the Subcommittee on Immigration, Refugees and International Law of the House Committee of the Judiciary, and the Immigration Task Force of the House Education and Labor Committee, 101st Cong. 614 (1990) (statement of Mark Tajima, Legislative Analyst, Chief Administrator Officer, County of Los Angeles, CA).

<sup>6</sup> See, e.g., Rachel Davidson, Laila Hlass, Katie Leiva & Gabriela Cruz, *False Hopes: Over 100,000 Immigrant Youth Trapped in the SIJS Backlog* (2023),

<https://static1.squarespace.com/static/5fe8d735a897d33f7e7054cd/t/656a48a3f02597441a4cbf95/1701464285675/2023-false-hopes-report.pdf>.

<sup>7</sup> USCIS Policy Alert, Special Immigrant Juvenile Classification and Deferred Action, PA-2022-10 (Mar. 7, 2022), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20220307-SIJAndDeferredAction.pdf>.

<sup>8</sup> *Id.* at 1.

deferred action; the form could also be used for young people with approved SIJS petitions to seek initial consideration for deferred action, if for some reason they had a deferred action adjudication contemporaneously with their SIJS petition approval notice. Thousands of SIJS youth have deferred action expiration dates of May 2026, and thus, they were counting on using the Form G-325A process to apply for renewal starting in December 2025.

By terminating the SIJS Deferred Action Policy through both the June 6 Policy Manual Update and the proposed Form G-325A revisions, USCIS is stripping SIJS recipients of protection from deportation and labor exploitation and violating the humanitarian purpose of the U.S. Congress in establishing SIJS.

**The Policy Underlying the Form G-325A Revisions Has Been Implemented in Violation of the Paperwork Reduction Act, Which Mandates Time for Comments.**

USCIS’s proposed changes to Form G-325A make a mockery of the notice and comment procedures. USCIS stopped granting deferred action to SIJS recipients in early April 2025, and it was not until June 6, 2025, that USCIS issued a policy alert terminating the SIJS Deferred Action Policy altogether.<sup>9</sup> [Since April [8], 2025, this office has seen \_\_\_\_ I-360 approvals without any mention of deferred action.] Thus, in reality, USCIS published a proposed form change on May 29, 2025 more than six weeks after it had already secretly made the changes supposedly “proposed” therein that effectively terminated the SIJS Deferred Action Policy. This violates the Paperwork Reduction Act, which mandates a 60-day comment period, agency consideration of comments received, and then a 30-day second comment period before any changes are enacted.<sup>10</sup>

**USCIS Did Not Provide a Reason for the Form Changes, Yet They Will Cause Severe Harm.**

USCIS provided no reason for the changes to Form G-325A, eliminating consideration of SIJS-based deferred action, only stating that it was publishing the proposed form changes to comply with the Paperwork Reduction Act. Yet, the purpose of the Paperwork Reduction Act (PRA) is to reduce the burden of filing paperwork on both the federal government and its constituents.<sup>11</sup> Forms issued by the Government are supposed to benefit, not burden the public.<sup>12</sup> Despite this requirement, the revisions to Form G-325A, along with USCIS’s decision to terminate the SIJS Deferred Action Policy, announced on June 6, 2025, two months after the agency had secretly enacted the policy change, impose a severe burden on children and youth who have been granted SIJS and about whom Congress enacted a detailed set of laws to ensure their protection and permanency.

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<sup>9</sup> USCIS Policy Alert, Special Immigrant Juvenile Classification and Deferred Action, PA-2025-07 (June 6, 2025), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20250606-SIJDeferredAction.pdf>.

<sup>10</sup> 5 CFR § 1320.8(d)(1).

<sup>11</sup> *Id.* § 1320.5(e). 44 U.S.C. § 3501.

<sup>12</sup> PRA, 44 U.S.C. § 3501.

## **The Ability to Obtain Employment Authorization Protects Youth Against Labor Exploitation, Permits Youth to Seek Careers and Post-Secondary Education, and Enables Youth to Access Essential Social Services That Require Government-Issued Identification.**

Deferred action provides SIJS youth with protection from deportation, as well as access to an employment authorization document (EAD). Access to EADs not only allows SIJS recipients to work lawfully and earn money to survive and thrive, but it also protects them from labor exploitation as they await available visas to apply for adjustment of status. Granting deferred action to noncitizens who would otherwise be ineligible for work authorization “helps encourage exploited workers to come forward, thereby allowing for the vigorous enforcement of labor and employment laws.”<sup>13</sup> EADs also enable SIJS recipients to begin careers and fund post-secondary education, rather than remain idle for years as they await adjustment of status.<sup>14</sup> Without an EAD, aspirations for college are frequently put on hold because youth have no ability to fund college, nor access to federal or state aid (except in a few states). The ability to enter the workforce lawfully also opens up incalculable opportunities for youth who are often left behind as their peers progress in their transition to adulthood. One study found that “the workplace offered strong avenues for integration as well as potential mentors.”<sup>15</sup> Finally, EADs allow children and youth to access essential social services that require government-issued identification.<sup>16</sup>

[ADD AN ANONYMIZED STORY HERE OF A YOUNG PERSON WHO BENEFITTED FROM AN SIJS DEFERRED ACTION-BASED EAD]

Less than one year ago, the Department of Homeland Security recognized the importance of “mitigating uncertainty about continued employment authorization for renewal applicants” and increased the automatic extension periods of certain EADs.<sup>17</sup> USCIS also has acknowledged that Congress envisioned SIJS recipients as ready candidates for permanent residency, lawfully

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<sup>13</sup> Lori A. Nessel, *Undocumented Immigrants in the Workplace: The Fallacy of Labor Protection and the Need for Reform*, 36 Harv. Civ. Rights-Civ. Liberties L. Rev. 345, 389 (2001).

<sup>14</sup> Kids in Need of Defense (KIND), *Left in Limbo: Why Special Immigrant Juveniles Need Employment Authorization* (January 2022), <https://supportkind.org/wp-content/uploads/2022/01/SIJS-EAD-Brief-1.10.21-FINAL.pdf>.

<sup>15</sup> Luis Edward Tenorio, *Special Immigrant Juvenile Status and the Integration of Central American Unaccompanied Minors*, The Russell Sage Foundation Journal of the Social Sciences, Vol. 6, No. 3, The Legal Landscape of U.S. Immigration in the Twenty-First Century (November 2020), at 172, 184.

<sup>16</sup> KIND, *Left in Limbo: Why Special Immigrant Juveniles Need Employment Authorization*, at 1 (explaining that “an EAD not only allows SIJS youth to obtain lawful employment, in many cases it is the sole available form of government-issued identification that may be used to access essential social services and benefits.”)

<sup>17</sup> DHS, Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Employment Authorization Document Renewal Applicants, 89 Fed. Reg. 101208, 101266 (Dec. 13, 2024),

<https://www.federalregister.gov/documents/2024/12/13/2024-28584/increase-of-the-automatic-extension-period-of-employment-authorization-and-documentation-for-certain>.

permitted to work.<sup>18</sup> Yet, the SIJS policy changes completely frustrate that vision, placing over 100,000 SIJS youth in danger.

### **Without Deferred Action, SIJS Youth Are at Risk of Detention and Deportation.**

The instant SIJS policy changes eliminating SIJS deferred action will cause increasing numbers of SIJS recipients to be detained and removed, devastating consequences that may ruin these young people's lives and that defy Congress's intent to protect SIJS youth and allow them to remain safely in the United States to access permanency through adjustment of status to lawful permanent residents. A youth approved for SIJS is a child who has been found by two governmental entities – a state family or juvenile court AND USCIS – to be a child that has been abused, neglected, and/or abandoned by at least one parent and for whom it is not safe to return to their country of origin. Yet, USCIS is now abandoning these young people without any defensible justification. The Department of Homeland Security claims that “President Trump and Secretary Noem take their responsibility to protect children seriously and will continue to work with federal law enforcement and the Department of Health and Human Services to ensure that children are safe from abuse, sexual exploitation, and trafficking.”<sup>19</sup> However, it is impossible to reconcile these claimed goals with the termination of the SIJS Deferred Action Policy. Without the protection from deportation conferred by deferred action, SIJS recipients are at risk of being removed from the United States, away from their court-appointed caregivers and to the very country that a juvenile court judge and USCIS have determined is not in their best interest to be returned.<sup>20</sup> This is no far-fetched scenario—under the current administration, DHS has increasingly arrested, detained, and advocated for the removal of SIJS youth in immigration court, and has actually removed numerous young people with pending or approved SIJS who lacked deferred action. Similarly, before the 2022 SIJS Deferred Action Policy during the first Trump administration, DHS routinely pursued removal orders against SIJS youth simply because they were waiting for a visa to adjust their status to lawful permanent residents.<sup>21</sup> While [organization/individual] strongly disagrees with the government's view that adjustment-eligible SIJS youth can be removed while they await a visa, in light of the government's incorrect position, deferred action is necessary to protect SIJS youth in the visa backlog and to align with Congressional intent behind the SIJS program.

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<sup>18</sup> USCIS Policy Alert, Special Immigrant Juvenile Classification and Deferred Action, PA-2025-07 (June 6, 2025),

<https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20250606-SIJDeferredAction.pdf>.

<sup>19</sup> DHS Press Release, “DHS Sweeps into Action to Protect Child from Tren de Aragua Parents” (Apr. 26, 2025), <https://www.dhs.gov/news/2025/04/26/dhs-sweeps-action-protect-child-tren-de-aragua-parents>.

<sup>20</sup> Dalia Castillo-Granados, *A Long Wait for Special Immigrant Juveniles Means a Risk of Deportation* (American Bar Association, Feb. 23, 2021),

[https://www.americanbar.org/groups/public\\_interest/immigration/generating\\_justice\\_blog/a-long-wait-for-special-immigrant-juveniles-means-a-risk-of-depo/](https://www.americanbar.org/groups/public_interest/immigration/generating_justice_blog/a-long-wait-for-special-immigrant-juveniles-means-a-risk-of-depo/).

<sup>21</sup> See, e.g., Rachel Leya Davidson & Laila Hlass, *Any Day They Could Deport Me*, at 21 (Nov. 2021), <https://static1.squarespace.com/static/5fe8d735a897d33f7e7054cd/t/61a7bceb18795020f6712eff/1638382830688/Any+Day+They+Could+Deport+Me+-+Over+44%2C000+Immigrant+Children+Trapped+in+the+SIJS+Backlog+%28FULL+REPORT%29.pdf>.

ADD AN ANONYMIZED SIJS YOUTH STORY HERE OF A YOUNG PERSON WHO BENEFITTED FROM SIJS DEFERRED ACTION BY BEING PERMITTED TO STAY SAFELY IN THE U.S.

[INCLUDE YOUR OWN ADDITIONAL REASONS WHY YOU OPPOSE THESE CHANGES AND WHY THEY WILL HARM SIJS YOUTH, YOUR ORGANIZATION, AND/OR OTHER STAKEHOLDERS E.G. EMPLOYERS, FAMILIES, OR EDUCATIONAL INSTITUTIONS!]

**Conclusion**

For all of the foregoing reasons, [Organization/I] urges USCIS to reinstate the SIJS Deferred Action Policy and maintain Form G-325A as it currently stands.

Sincerely,

[add your name, title and organization, if relevant, here]

## TEMPLATE 2: ALLIES

*This is a simplified version of the more detailed comment above. It is designed for concerned individuals including foster parents and allies. You can submit it for both the policy manual change and the proposed changes to Form G-325A. Don't forget to add the subject lines and addressees provided above for each!*

I am writing to express my opposition to USCIS's June 6, 2025 termination of the Deferred Action Policy for children and youth who have been approved for Special Immigrant Juvenile Status (SIJS). I am also asking USCIS not to make the proposed changes to Form G-325A. These changes merely reflect the end of SIJS deferred action, a policy change that harms children and should not have taken place. Furthermore, the termination of the SIJS Deferred Action Policy has already occurred and asking for feedback on the form after the fact only demonstrates the lack of care behind USCIS's termination of these protections. It is also against the law which requires that there be notice of the form change and time for the public to comment on it before its implementation. I implore USCIS to reinstate Deferred Action for these young people who, but for a visa backlog, would have permanent protection. These youth are on a pathway to lawful permanent resident status and should be protected until they are able to obtain the safety and stability they need. This is why USCIS originally created the SIJS Deferred Action Policy in 2022. Moreover, USCIS granted these children SIJS because they need protection, but this policy change puts them at risk of deportation and other harms for reasons beyond their control.

I care about this issue because...[fill in reasons such as your values, experience, people you know, your relationship with SIJS youth, policies you care about, etc.].

Ending Deferred Action for SIJS youth puts at risk some of the most vulnerable immigrant young people in the United States—those who have experienced abuse, abandonment or neglect by a parent. This policy change contradicts the protective reasons that the U.S. Congress created this status in the first place.

Deferred Action has been necessary because SIJS was inaccurately categorized as an employment visa even though it is a humanitarian protection for children, placing SIJS petitioners alongside adults seeking employment-based status in a category with a limited number of visas for green cards. This has resulted in youth who have been approved for SIJS being forced to wait in a years-long visa backlog, rather than receiving immediate and permanent protection. Deferred Action should continue until the visa backlog ends, and until every child is able to access the stability and protection they need.

Ending Deferred Action for SIJS youth bars their access to work permits for years while they are trapped in the visa backlog. Work permits provide protection from labor exploitation, allowing SIJS youth to work lawfully, earn money for basic needs, and continue education and workforce preparation while waiting in the backlog during a pivotal time in their transition to adulthood.

Deferred Action for SIJS youth helps to protect these children from abuse, sexual exploitation, and trafficking, a stated concern for President Trump and DHS Secretary Noem, and a concern for the American people.

Please reinstate Deferred Action for SIJS youth in the visa backlog. Please abandon the changes to Form G-325A. Protecting children already present in our communities is important to me as an American, and represents our national values. These children have already been through so much and should be supported and protected, not facing fear of deportation and exploitation.

Sincerely,  
[add your name here]