



**Migration and Refugee Services
Office of the Executive Director**

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WEBSITE: www.usccb.org/mrs

August 22, 2017

Elaine Duke
Acting Secretary of Homeland Security
U.S. Department of Homeland Security
Washington, D.C. 20528

Dear Acting Secretary Duke:

On behalf of the U.S. Conference of Catholic Bishops' Office of Migration and Refugee Services, I write to express our deep disappointment regarding the August 16th decision to terminate the Central American Minors (CAM) Parole Program. We urge you to reconsider this decision and fully reinstate the program. At a minimum, we urge you to allow those children approved for conditional parole but still in their home countries the opportunity to reunify with their parents in the United States. As discussed below, we also ask that you address challenges in the review process for CAM applications and consider further engagement with the impacted children, their caretakers and service provider stakeholders here in the United States.

The Catholic Church has a strong interest in the protection of child migrants. They, like all God's children, were created in His image and have a unique and sacred dignity. Pope Francis, in his message for the 2017 World Day of Migrants and Refugees, reiterated the need to assist child migrants, stating: "I ask everyone to take care of the young, who in a threefold way are defenseless: they are children, they are foreigners, and they have no means to protect themselves." USCCB's Migration and Refugee Services (USCCB/MRS) works to assist these vulnerable children and their families, in part through the CAM Program. Through our network, USCCB/MRS has helped over 1,200 parents submit Affidavits of Relationship for their children in-country, a preliminary step in filing a CAM application.

The U.S. bishops have supported the CAM Parole Program because it provides critical temporary protection and a legal avenue for vulnerable children from El Salvador, Honduras, and Guatemala (the Northern Triangle of Central America) to reunify with their parents in United States. My staff was recently on a delegation to El Salvador and saw firsthand the dangers and challenges these children face. While poverty and the desire to reunify with family to attain security are ongoing motivations to migrate, violence – in the home and at the community and state level – is a primary factor forcing children to flee the Northern Triangle.

The CAM Parole Program has helped many children, such as Lucia,¹ escape this terrible violence and reunite with family. Lucia was living in El Salvador with her grandmother when, at the age of 16, she became a target for local gangs. After refusing to become a gang member's "girlfriend," the gang threatened Lucia's life as well as that of her family. Facing daily harassment, Lucia lived in constant fear for her safety. She could no longer even attend school due to the danger posed by the gang. Through the CAM Parole Program, Lucia was able to find a safe and legal way to escape this danger and reunite with her mother in the United States.

¹ Child's name changed to protect the client's privacy.

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Without the daily threat of violence hanging over her, Lucia is thriving. She is attending high school and maintaining a 4.0 GPA.

While the root causes of migration must be addressed so that children like Lucia can find safety and opportunity in their homeland, in the interim, our nation has a moral duty to assist these children seeking protection. The CAM Parole Program was a key element of the multi-dimensional approach needed to address child migration from the Northern Triangle. Without the program, we fear that many children will be forced to undertake dangerous journeys to escape potentially life-threatening violence, putting them at risk of abuse and exploitation by smugglers and traffickers. In an effort to promote the safety of these children, as well as legal and orderly migration, we ask you to reconsider your decision to terminate this vital portion of the CAM Program.

We are particularly troubled to learn that, in terminating the program, DHS revoked conditional parole previously granted to an estimated 2,700 children including their relatives. At a minimum, we urge you to allow these approved children to reunite with their parents in the U.S. Many of these families have been waiting expectantly for months to be reunited. Requiring them to request reconsideration of their application for refugee status by filing a "Request for Review" (RFR) or to reapply for parole outside of the CAM Program is not only unjust, it appears to be an inefficient use of DHS resources.

Additionally, while we appreciate that DHS is willing to provide a renewed period of 90 days to file RFRs for children and their relatives whose conditional parole has been revoked, we have learned from our network that shortfalls exist in the current RFR process. Namely, when a child's application for refugee status is denied, DHS does not provide the exact reason for denial. This makes the RFR process unnecessarily opaque and inefficient, as the child is nonetheless expected to include in the request a detailed explanation of the error made by the adjudicating officer or new information that would merit a change in the decision. We ask that you provide applicants with the reason for denial of refugee status; doing so will promote timely and tailored RFRs and allow efficient processing of these requests.

Finally, we understand that individuals can apply for parole outside of the CAM Program by filing Form I-131 with USCIS. We encourage you to engage in outreach to CAM applicants, their families and service provider stakeholders to provide them with additional information and guidance on this process and the timeframe for review of these applications.

My office appreciates your review of these requests and would welcome further engagement with DHS on these issues.

Sincerely,


William A. Canny
Executive Director



U.S. Citizenship
and Immigration
Services

OCT 25 2017

William Canny
Executive Director
Migration and Refugee Services
Office of the Executive Director
3211 4th Street, NE
Washington, DC 20017

Dear Mr. Canny:

Thank you for your August 22, 2017 letter. Acting Secretary Duke asked that I respond on her behalf.

In your letter, you ask that the Central American Minors (CAM) Parole Program be reinstated or that individuals who were conditionally approved for parole be allowed to enter the United States. Following the issuance of Executive Order 13767, "Border Security and Immigration Enforcement Improvements," which was signed on January 25, 2017, DHS conducted a careful review of the CAM Parole program, and Acting Secretary Duke decided to terminate the program. The CAM Parole program was implemented as part of an integrated strategy to address factors contributing to increases in migration from Central America to the United States. However, as indicated by the Executive Order, DHS is pursuing a new strategy to secure the U.S. Southern Border. When the CAM Parole Program was terminated on August 16, 2017, the Federal Register notice announced that no additional individuals will enter into the United States under this program, including those who were conditionally approved for parole.

In your letter, you also encourage U.S. Citizenship and Immigration Services (USCIS) to contact CAM applicants to provide additional information on the process to apply for parole outside the CAM program. We have recently sent notices to all qualifying parents in the United States whose children and eligible accompanying family members had been conditionally approved for parole, but under the CAM Parole program. Additionally, with the assistance of the International Organization for Migration, we are in the process of providing individual notices to those affected individuals in the Northern Triangle countries. The notification that parents and their qualifying relatives will receive, announces the termination of the program, includes some information on the process to apply for parole outside the CAM program, and refers individuals to www.uscis.gov/humanitarianparole for more information.

Additionally, while there is some information on re-parole currently available in the Federal Register notice and at www.uscis.gov, we also mailed notices regarding termination of the CAM Parole program and information on how to request re-parole to all individuals who were already paroled into the United States under this program. The notice explains that a re-parole request must establish urgent humanitarian reason, significant public benefit for the individual to stay in the United States, and show that the individual merits a positive exercise of discretion. The notice also refers individuals to www.uscis.gov/humanitarianparole for additional information on re-parole.

With regard to denials and the Request for Review (RFR) process, Resettlement Support Center staff counsels applicants on their decisions, and are able to provide information on the RFR process. In addition, applicants may seek assistance from another individual, organization, or attorney when preparing an RFR. Please see our RFR Tip Sheet at <https://www.uscis.gov/humanitarian/refugees-asylum/refugees/request-review-tip-sheet> for more information on the RFR process.

We appreciate your suggestion that additional outreach to stakeholders and CAM applicants would be helpful and will explore setting up a stakeholder call to address questions regarding the parole and RFR processes.

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 me.

Sincerely,



L. Francis Cissna
Director