



April 5, 2017

The Honorable John F. Kelly
Secretary of U.S. Department of Homeland Security
3801 Nebraska Ave., N.W.
Washington, D.C. 20016

Dear Mr. Secretary:

On behalf of the National Immigration Forum (Forum), I write to express our deep concern about reports of a DHS policy change that would separate children from their parents or other adult family members who enter the U.S. through our southern border and to begin a dialogue about finding constructive solutions to the challenging issues facing our immigration system.

The Forum advocates for the value of immigrants and immigration to the nation. Founded in 1982, the Forum plays a leading role in the national debate about immigration, knitting together innovative alliances across diverse faith, law enforcement, veterans and business constituencies in communities across the country. Leveraging our policy, advocacy and communications expertise, the Forum works for common sense immigration reform, sound border security policies, balanced enforcement of immigration laws, and ensuring that new Americans have the opportunities, skills, and status to reach their full potential.

Any policy that seeks to break up families is troubling and problematic both for the families who will suffer great harm and the U.S. communities whose burden it will be to care for these displaced children. In addition to being very costly and potentially traumatic, this policy is not likely to deter families fleeing violence and persecution from coming to the U.S. to seek refuge.

Family unity is an integral American value. Rather than pull families apart, we should aim to preserve and protect them. Research shows that children separated from their families and put into foster care are more likely to develop behavior problems and be maladjusted.¹ They are also much more likely to face physical and sexual abuse.² Parental absences are also positively

¹ Lawrence, C., Carlson, E., & Egeland, B. (2006). The impact of foster care on development. *Development and Psychopathology*, 18(1), 57-76. doi:10.1017/S0954579406060044 Retrieved from <https://www.cambridge-org.proxyiub.uits.iu.edu/core/services/aop-cambridge-core/content/view/9B6A8059208B7FA5F677E2A063968C5B/S0954579406060044a.pdf/div-class-title-the-impact-of-foster-care-on-development-div.pdf>

² National Coalition for Child Protection Reform. (2015). Foster Care vs. Family Preservation: The Track Record on Safety and Well-being. Nccpr.org. Retrieved from <http://www.nccpr.org/reports/01SAFETY>

correlated with poor mental health and high suicide rates among children and teens.³ Under a family separation policy, children from different countries and cultures will be placed with total strangers who may not even speak their language, adding even more stress to an already stressful situation. After all the trauma children experience fleeing violence and persecution in their home countries, it should not be our nation's policy to increase that trauma.

As of 2011, more than 5,000 children of deported adults were in the U.S. foster care system.⁴ If a family separation policy is adopted, this number will drastically increase, burdening an already crowded system, and imposing additional costs on state governments and individual taxpayers. A family separation policy could also lengthen and create inefficiencies in the legal process. With parents and children separated, it is possible that multiple members of one family might each need separate hearings with multiple lawyers and judges.⁵ Moreover, asylum cases are already facing a backlog of three to four years; creating multiple cases for one family could increase this dramatically.⁶

Finally, such a policy is not likely to deter parents from making the journey to the United States. Three of the top five countries for which USCIS granted asylum in fiscal year 2015 (the last year for which there is data) are in Central America: Guatemala, Honduras and El Salvador.⁷ One in four Salvadorians is a victim of crime, and the country's homicide rate is one of the highest in the world (81 per 100,000 inhabitants in 2016).⁸ In 2015, Guatemala reported 91 homicides a day, but the figure is likely higher, and Honduras's murder rate was 60 per 100,000 in 2015.⁹ The threat of family separation at the U.S. border will not deter a parent whose children's lives are at risk living in countries where gangs, drug cartels, and transnational criminal organizations prey upon families.¹⁰

We appreciate that the administration wants to protect Americans and immigrants making the dangerous journey to the United States. However, because the proposed policy of family separation will be detrimental to the affected families, costly to the affected states, inefficient for the legal system, and unlikely to deter persecuted migrants from traveling to the U.S., we encourage DHS to consider alternatives.

³ Adam EK. Beyond quality: Parental and residential stability and children's adjustment. *Current Directions in Psychological Science*. 2004;13:210–213. Retrieved from

<https://www.sesp.northwestern.edu/docs/publications/111914223bec1762d2.pdf>

⁴ Wessler, S., et al. (2011). *Shattered Families: The Perilous Intersection of Immigration Enforcement and the Child Welfare System*. *Applied Research Center*. Retrieved from <https://www.raceforward.org/research/reports/shattered-families>

⁵ Schmidt, S. (2017, March 7). DHS is considering separating mothers and children who cross the border illegally. *Washington Post*. Retrieved from https://www.washingtonpost.com/news/morning-mix/wp/2017/03/07/dhs-is-considering-separating-mothers-and-children-who-cross-the-border-illegally/?utm_term=.8dd37c697d9f

⁶ USCIS. (2017). *Affirmative Asylum Scheduling Bulletin*. USCIS.gov. Retrieved from <https://www.uscis.gov/humanitarian/refugees-asylum/affirmative-asylum-scheduling-bulletin>

⁷ Office of Communications and Legislative Affairs. (2016). *FY 2015 Statistics Yearbook*. U.S. Department of Justice. Retrieved from <https://www.justice.gov/eoir/page/file/fysb15/download>

⁸ OSAC. (2017). *El Salvador 2017 Crime and Safety Report*. OSAC.gov. Retrieved from <https://www.osac.gov/pages/ContentReportDetails.aspx?cid=21308>

⁹ OSAC. (2016) *Guatemala 2016 Crime and Safety Report*. OSAC.gov. Retrieved from <https://www.osac.gov/pages/ContentReportDetails.aspx?cid=19279>; OSAC. (2017). *Honduras 2017 Crime and Safety Report*. OSAC.gov. Retrieved from <https://www.osac.gov/pages/ContentReportDetails.aspx?cid=21167>

¹⁰ Schmidt, *supra* n. 5

Given the importance of these issues, I would like to meet with you to further share our perspectives and discuss possible constructive solutions. Please feel free to contact me at anoorani@immigrationforum.org or Jacinta Ma, our Director of Policy and Advocacy at jma@immigrationforum.org to coordinate a meeting or if you have any questions or need additional information. We look forward to working with you.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ali Noorani', with a long horizontal flourish extending to the right.

Ali Noorani
Executive Director