

July 30, 2019

The Honorable Dr. Mark T. Esper  
Secretary  
U.S. Department of Defense  
1000 Defense Pentagon Washington, DC 20301-1000

The Honorable Kevin K. McAleenan  
Acting Secretary  
U.S. Department of Homeland Security  
3801 Nebraska Avenue NW  
Washington, DC 20016

The Honorable Kenneth T. Cuccinelli  
Acting Director  
U.S. Citizenship and Immigration Services  
20 Massachusetts Avenue, NW  
Washington, D.C. 20529

Dear Secretary Esper, Acting Secretary McAleenan, and Acting Director Cuccinelli:

Our organizations write to you in order to express our concerns over recent reports regarding the proposed rescission of the military parole in place (PIP) program. By statute, the Secretary of the Department of Homeland Security has the authority to parole individuals into the United States for urgent humanitarian reasons or significant public benefit. Most visibly, PIP has been used to protect designated family members of U.S. military personnel and veterans from targeted immigration enforcement and removal from the United States.

While many issues within immigration law and policy are complex, the decision to continue protecting the families of active military and veterans should be straightforward. The men and women of our armed forces should be provided full and unwavering commitments from our government. Each day, without hesitation, they place themselves in harm's way in order to protect our nation and ensure for domestic tranquility. In light of their service, we believe that our nation's government should not only work to ensure for their protection, but also provide for the protection and tranquility of their spouses, children, and parents, regardless of immigration status.

In addition to the obvious humanitarian benefits of the PIP program, it also helps to ensure the military readiness of our nation's military. Removing PIP protections for military families will almost certainly result in anxiety and stress for many active duty servicemembers worried that their loved ones may be deported while they are deployed abroad. Creating this kind of stress and concern can hamper our nation's military objectives. In fact, creating such a worry could undermine military preparedness and dissuade qualified individuals from seeking to extend their military careers or even enlist in the first place.

The current U.S. Citizenship and Immigration Services' (USCIS) Adjudicator's Field Manual (AFM) Chapter 21.1(c)(1) explicitly outlines how the PIP policy supports the Department of Defense (DoD) in several ways<sup>1</sup>, including:

- Ensuring consistent support for our military personnel and veterans, who have served and sacrificed for our nation, and their families.
- Facilitating military morale and readiness and supporting DoD recruitment policies by considering temporarily deferring the removal of certain military family members; and,
- Building on existing USCIS and DoD initiatives and policies designed to assist military members, veterans, and their families in navigating our complex immigration system.

These joint USCIS and DoD priorities remain as true and beneficial today as the day they were formally implemented. This program's genesis was based on rare bipartisan support from members of Congress who understood the importance of ensuring the morale and readiness of our armed forces.<sup>2</sup> As such, we must urge the Department of Homeland Security and USCIS to maintain Parole in Place for military families so that these families may continue to be protected. A change in policy that results in the separation of military families will hurt the very individuals who have sacrificed their safety and security to protect the safety and security of our nation. The undersigned organizations voice our support for continuing PIP for military families in order to maintain America's commitment to military families and our military readiness.

Thank you for your consideration of this request. If you have any questions, please contact AILA Director of Government Relations, Sharvari Dalal-Dheini at (202) 507-7600 or at [SDalal-Dheini@aila.org](mailto:SDalal-Dheini@aila.org).

Sincerely,

American GI Forum of the United States  
American Immigration Lawyers Association  
Asian Americans Advancing Justice (AAJC)  
Asian Americans Advancing Justice – Atlanta  
Asian Americans Advancing Justice – Los Angeles  
Boulder Valley Unitarian Universalist Fellowship Immigration Justice Task Force  
Catholic Legal Immigration Network, Inc  
Central American Resource Center of California (CARECEN)  
Entre Hermanos  
FWD.us  
Georgia Association of Latino Elected Officials (GALEO)  
Illinois Coalition for Immigrant and Refugee Rights (ICIRR)  
Immigration Institute of the Bay Area  
Interfaith Refugee & Immigration Service

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<sup>1</sup> See AFM 21.1(c)(1) available at <https://www.uscis.gov/ilink/docView/AFM/HTML/AFM/0-0-0-1/0-0-0-3481/0-0-0-3501.html>

<sup>2</sup> See Congressional Letter Exchange Between Representatives and DHS Regarding Immigration Relief for Military Members (July 9, 2010) available at, <https://www.aila.org/infonet/cong-letter-exchange-immigration-relief-military>

International Rescue Committee  
Korean Resource Center  
Military Officers Association of America (MOAA)  
National Immigration Forum  
National Immigration Law Center  
National Military Family Association  
National Partnership for New Americans  
Niskanen Center  
OneAmerica  
Seattle Office of Immigrant and Refugee Affairs  
UnidosUS  
Veterans for American Ideals  
VoteVets  
West African Community Council