

SENT VIA ELECTRONIC MAIL

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United States Department of Justice

James McHenry, Director
Executive Office for Immigration Review
United States Department of Justice

Lauren Alder Reid, Assistant Director
Office of Policy
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United States Department of Justice

Chad Wolf, Acting Secretary
United States Department of Homeland
Security

Chad R. Mizelle, Senior Official Performing the
Duties of the General Counsel
United States Department of Homeland
Security

Kenneth Cuccinelli, Senior Official Performing
the Duties of the Director
Citizenship and Immigration Services
United States Department of Homeland
Security

Maureen Dunn, Chief
Division of Humanitarian Affairs, Office of
Policy and Strategy
Citizenship and Immigration Services
United States Department of Homeland
Security

Paul Ray, Administrator
Office of Information & Regulatory Affairs
Office of Management and Budget
Executive Office of the President

June 18, 2020

RE: Request to Provide a Minimum of 60 days for Public Comment in Response to the Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) and Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) (the Departments) Joint Notice of Proposed Rulemaking (NPRM): [Procedures for Asylum and Withholding of Removal; Credible Fear and Reasonable Fear Review; RIN 1615-AC42 / 1125-AA94 / EOIR Docket No. 18-0002/ A.G. Order No. 4714-2020](#)

Dear Attorney General Barr, Director McHenry, Assistant Director Reid, Acting Secretary Wolf, Senior Official Mizelle, Senior Official Cuccinelli, Division Chief Dunn, and Administrator Ray:

We, the undersigned 502 organizations, write to urge the Departments to allow at least 60 days for public comment on the above referenced NPRM. We make this request due to the length and complexity of the 161-page rule, the critical interests it implicates, and the inherent challenges of meaningfully engaging in the public comment process during an unprecedented [global pandemic](#). Furthermore, the substantive concerns with the rule that we raise below are solely included for the purpose of supporting this request. They do not represent the full scope of our

concerns, and this request should not be considered public comments pursuant to the process required under the [Administrative Procedure Act \(APA\)](#).

I. **A Minimum of 60 Days is Required for Meaningful Public Comment on the NPRM**

A. The NPRM is Extremely Lengthy, Complex, and Will Have Devastating Human Consequences if Implemented

[Executive Order 12866](#) requires agencies to “...afford the public a meaningful opportunity to comment on any proposed regulation, which in most cases should include a comment period of *not less than 60 days*.” [Executive Order 13563](#) likewise directs agencies to “...afford the public a meaningful opportunity to comment through the Internet on any proposed regulation, with a comment period that should generally be *at least 60 days*.” Citing Executive Order 12866 itself, the Departments note in the NPRM that it is a “significant regulatory action...because it raises novel legal or policy issues.” There is no compelling reason to except the NPRM from the Executive Orders’ general rule of providing a minimum of 60 days for public comment. Rather, the highly technical, nuanced, legal and policy issues the NPRM addresses—and, above all, the severe human cost it is certain to inflict—illustrate why a minimum of 60 days must be allowed for the public to file comments in response to the rule.

Sweeping in scope, and with incalculably high stakes, the NPRM proposes detailed and complex multi-section regulatory changes that span 63 pages. The rule would decimate decades of vital substantive and procedural protections for asylum seekers, as well as applicants for statutory withholding of removal and/or withholding of removal under the [United Nations Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment \(CAT\)](#). Among the rule’s specific targets are those fleeing life-threatening atrocities such as forced marriage, domestic violence, human trafficking, honor crimes, female genital mutilation/cutting, and brutal punishment for one’s sexual orientation/gender identity. Survivors of such abuses are among the most vulnerable victims; searing social stigmas, threats, and reprisals from within their own families and communities isolate and endanger them further if and when they try to flee. At best, the State provides no protection to survivors; at worst, the State condones or is complicit in committing these acts.

For the majority who survive not only persecution, but a treacherous journey to the United States in search of safety, the rule will all but foreclose relief as a threshold matter. It imposes new, impossibly high evidentiary standards at all stages of the application process that any asylum seeker, regardless of the type of persecution suffered, must meet. The rule further eviscerates what little due process remains in our asylum system; various provisions, alone or in combination with one other, guarantee that most claims will fail well before an applicant has even set foot in the courtroom. This is particularly alarming since even without the rule, current Administration policies have resulted in a [40% lower asylum grant rate than the rate recorded during the prior two administrations](#).

As described above, the profound human consequences of the rule cannot be overstated. Survivors of persecution who meet the statutory definition of a refugee but are ineligible for asylum under the rule will be unlawfully returned home to face further harm, [including death](#) at

the hands of the persecutors they fled. The return of refugees – “*refoulement*” – mandated by the rule violates our federal asylum statute and longstanding legal precedents, and it also directly contravenes our international human rights obligations as a party to the [United Nations 1951 Convention and 1964 Protocol Relating to the Status of Refugees](#) and the CAT. For the few who remain eligible for CAT and/or statutory withholding of removal, securing relief will be elusive and is hardly a proxy for asylum. Unlike with asylum, those who do receive withholding of removal in either form remain vulnerable to removal at any time and are unable to reunify with and extend protection to immediate family in imminent danger. Children in need of relief whose parents apply for withholding of removal face re-traumatization; they must apply and be interviewed on their own as principal applicants, rather than as asylum applicant derivatives of their parents. [USCIS itself recognizes children’s unique vulnerabilities](#) in this regard.

Given the devastating impact the rule will have on such a broad spectrum of stakeholders - asylum seekers, their families, advocates and service providers, the public, and the government - and that life and liberty are acutely at stake, a 30-day comment period is patently insufficient for adequate public analysis and input to be provided on the NPRM.

B. [The COVID-19 Crisis Substantially Impedes the Public’s Ability to Meaningfully Participate in the Administrative Process](#)

As you are aware, the President declared a [national emergency](#) in March of this year in light of the COVID-19 global pandemic. Governors throughout the country subsequently urged Americans to stay home and work from home, and schools and now summer camps have largely closed. At the same time, immigration procedures have been regularly shifting to accommodate the new circumstances brought on by the pandemic. Practitioners have had to remain up to date and readily inform clients of the ever-changing legal landscape. Those working remotely have more limited and inconsistent access to physical documents, clients, information, and technology needed to fully analyze and comment on proposed rules, with minimal advance warning. Stakeholders are struggling to perform their jobs, in many instances doing so while simultaneously providing childcare and/or assisting children with remote learning. Normal business operations have been dramatically disrupted, including those of your and other federal agencies. And, according to recent data, more than half of all asylum seekers granted affirmative relief [reside in states that have been hit extremely hard by COVID-19 - California, Florida, and New York](#). As a result, stakeholders with arguably the highest vested interest in the NPRM are those who may be *least* able to meaningfully engage in the comment process during this crisis.

Indeed, USCIS itself has recognized that flexibility such as extending timeframes is warranted because of the pandemic. USCIS implemented changes in operating procedures for its personnel and offices and is [allowing a 60 day grace period](#) to respond to Requests for Evidence and Notices of Intent to Deny. Several other agencies have followed suit, including the [Transportation Safety Administration](#), the [Department of Education](#), [Public Company Accounting Oversight Board](#), [Federal Housing Finance Agency](#), [Department of the Treasury and Internal Revenue Service](#), the [Federal Reserve](#), and the [Securities and Exchange Commission](#). While certain non-emergency in-person services are beginning to tentatively [resume](#) in phases, workplaces will operate in a vastly different manner pursuant to new public safety [procedures](#). Additionally, childcare responsibilities endure despite the need for caregivers to simultaneously return to work.

The challenges of cautiously implementing new workplace measures, along with persistent uncertainty and daunting burdens for individuals and families, signal that we remain far from returning to business as usual. The ongoing national emergency related to COVID-19 will thus prevent commenters from submitting thorough, detailed analyses of the rule within the restrictive 30-day timeframe proposed by the Departments.

C. The NPRM Does Not Further Any Urgent Public or Government Interest to Justify Curtailing the Public’s Right to Fully Participate in the Administrative Process

Earlier this year, in light of the COVID-19 crisis, the [National Governors Association and state, local, and county organizations](#), as well as [twenty-two Senators](#) and [fourteen House Committee Chairs](#) urged the Office of Management and Budget (OMB) to immediately direct federal agencies to extend or postpone public comment periods to preserve the public’s right to fully engage in the administrative process as contemplated by our laws. In response, the OMB Office of Information and Regulatory Affairs (OIRA) acknowledged that COVID-19 has disrupted the lives of those potentially responding to NPRMs. OIRA further advised that work must continue on regulations that “respond to the COVID-19 outbreak...support measures to secure the prosperity of American workers and small businesses, ... [and respond] to urgent needs.” An agency could extend comment periods for certain NPRMs if, in consultation with OIRA, it determines that “the need to allow more time...*outweighs any need for urgency in the rulemaking*” (emphasis added) and OIRA staff are prepared to coordinate with agency staff “to evaluate these competing priorities.”

The Departments’ decision to press forward with this rule during the pandemic is inexplicable and arbitrary under OIRA’s guidance. The rule *does not refer or relate to COVID-19 in any way*. And the rule also does not implicate any other legitimately urgent matter. The rule’s extensive proposed changes to the credible/reasonable fear interview (CFI) process are hardly needed at a time when [the border is closed to asylum seekers](#) indefinitely.

The Departments allege that the rule’s heightened standards for securing relief and lowered standards for maintaining asylum application confidentiality are needed to curb fraud. Yet, rigorous [existing fraud detection measures](#) both during CFIs and throughout the asylum process have proven successful. Furthermore, [claims of ‘rampant’ asylum fraud and abuse](#) are anecdotal and unsubstantiated; they largely rest on a false correlation drawn between fraud and high application and CFI passage rates. By contrast, maintaining eligibility standards and confidentiality safeguards consistent with our longstanding domestic laws and international obligations are critical to keeping asylum seekers safe. The urgency in doing so is paramount.

The Departments also cite the need to promote clarity and efficiency in our asylum system through the rule. While these are no doubt important goals, they cannot and must not be achieved by sacrificing safety for asylum applicants. Summarily excluding broad categories of individuals and denying them their day in court unlawfully obliterates our asylum system. A system’s efficiency cannot rest on the fact that it barely exists at all.

There is no competition among priorities here: Eviscerating humanitarian protection for the most vulnerable among us, at both their own and America’s expense, should hardly be a

priority at any time least of all during this extraordinary crisis. Again, the rule poses a direct and unprecedented threat to life and liberty for the very asylum seekers that our laws are meant to protect. There is no reasonable justification for refusing to provide the public with the maximum amount of time to engage in careful review and analysis of the rule contemplated by the APA.

II. Conclusion

The NPRM dismantles asylum eligibility for traumatized and vulnerable individuals beyond recognition. As a result, the United States will unlawfully return asylum seekers to grave danger under the rule. The human cost of the rule is beyond measure and demands the most careful research, analysis, and public consultation. It is highly inappropriate to afford the public a mere 30 days for comment on a proposal that violates our domestic laws and international obligations on its face; even more so during an unprecedented global crisis such as COVID-19. To honor the public's right to a meaningful and fair opportunity to respond to the NPRM, consistent with the Executive Orders cited above, the Administrative Procedure Act, and the OMB OIRA's own guidance, a comment period of at least 60 days must be provided.

Thank you in advance for your time and consideration of this request. Please contact Irena Sullivan at irena@tahirih.org with any questions or concerns, and we look forward to your prompt response.

Sincerely,

National

Activism Caucus of the Association for Women in Psychology
ADL (Anti-Defamation League)
Advocates for Immigrant Rights
Advocating Opportunity
AFL-CIO
African Cultural Alliance of North America (ACANA)
AHA Foundation
American Association of University Women (AAUW)
American Friends Service Committee
American Humanist Association
American Immigration Council
American Immigration Lawyers Association
Amnesty International USA
Asian Pacific Institute on Gender-Based Violence
ASISTA
Association of Pro Bono Counsel
Asylum Seeker Advocacy Project
Asylum Sponsorship Project
AsylumConnect
Battered Women's Justice Project

Black Alliance for Just Immigration (BAJI)
Casa de Esperanza: National Latin@ Network for Healthy Families and Communities
Catholic Charities
Catholic Legal Immigration Network, Inc.
Center for Gender & Refugee Studies
Center for Victims of Torture
CHANGE (Center for Health and Gender Equity)
Church World Service
Clearinghouse on Women's Issues
Coalition to Abolish Slavery & Trafficking (Cast)
Columbia Law School Immigrants' Rights Clinic
Committee of Interns and Residents - SEIU Healthcare
Conference of Major Superiors of Men
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Cornell Law School Asylum Appeals Clinic
D. C. Unit Church Women United
Danu Center for Strategic Advocacy
Dominican Leadership Conference
Duke Immigrant Rights Clinic
DVSur5r Network
Equality Now
FaithTrust Institute
Families Belong Together
Feminist Majority Foundation
forma
Freedom Network USA
Futures Without Violence
Gangashakti
Girls Learn International
Global Hope 365
Global Woman P.E.A.C.E. Foundation
Haitian Bridge Alliance
Harvard Immigration and Refugee Clinical Program
HIAS
Human Rights First
Human Rights Watch
Immigrant and Non-Citizen Rights Clinic, CUNY School of Law
Immigrant Justice Corps
Immigrant Legal Resource Center (ILRC)
Immigration Equality
Immigration Hub
IndivisAbility
Indivisible
Indivisible Cenla
Innovation Law Lab
International Center for Research on Women (ICRW)

International Civil Society Action Network (ICAN)
International Refugee Assistance Project
International Rescue Committee
Jennifer Ann's Group
Jewish Women International
Justice Action Center
Justice in Motion
KARAMAH: Muslim Women Lawyers for Human Rights
Kids in Need of Defense
Latin America Working Group
Leadership Conference of Women Religious
League of Women Voters of the United States
LGBT Freedom and Asylum Network
Lutheran Immigration and Refugee Service
MADRE
Medical Students for Choice
Médecins Sans Frontières / Doctors Without Borders USA
Minnesota Coalition Against Sexual Assault
Ms. Magazine
Muslims for Progressive Values
NAACP
National Advocacy Center of the Sisters of the Good Shepherd
National Alliance to End Sexual Violence
National Center for Health Research
National Center on Domestic and Sexual Violence
National Coalition Against Domestic Violence
National Council of Jewish Women
National Crime Victim Law Institute
National Domestic Violence Hotline
National Immigrant Justice Center
National Immigration Law Center
National Immigration Litigation Alliance
National Immigration Project of the National Lawyers Guild
National Network for Immigrant & Refugee Rights
National Network to End Domestic Violence
National Organization for Women
National Organization of Sisters of Color Ending Sexual Assault
National Partnership for New Americans
National Resource Center on Domestic Violence
Nerlow Afriki Inc.
NETWORK Lobby for Catholic Social Justice
Network of Jewish Human Service Agencies
Oxfam America
Passionists International
Pathways to Safety International
Physicians for Human Rights

Planned Parenthood Federation of America
Population Connection Action Fund
Poverty Elimination and Community Education (PEACE) Foundation
Progressive Democrats of America
Promundo-US
Public Counsel
Quixote Center
RAHMA
RAICES
Redwood Justice Fund
Refugees International
Round Table of Former Immigration Judges
Rural Coalition
Sahiyo
Save the Children Action Network
Service Employees International Union
She Grows It, LLC
Sisters of Charity Federation
Sojourners
Soroptimist International of the Americas
South Asian Americans Leading Together (SAALT)
Stardust
StoryCenter
Survivors' Corner
T'ruah
Tahirih Justice Center
The Advocates for Human Rights
The America Team for Displaced Eritreans
The Human Trafficking Legal Center
The Hunger Project
The Immigration Hub
The National Association for Nurse Practitioners in Women's Health
The U.S. End FGM/C Network
The Women's Equal Justice Project
There Is No Limit Foundation
Too Young to Wed
U.S. Committee for Refugees and Immigrants
Ujima Inc: The National Center on Violence Against Women in the Black Community
UnidosUS
Unitarian Universalist Service Committee
United We Dream
Vital Voices Global Partnership
Washington Office on Latin America
We Are All America
WeSpeakOut
Witness at the Border

Women for Afghan Women
Women for Women International
Women Graduates-USA
Women of Color Advancing Peace and Security
Women's Institute for Freedom of the Press
Women's Refugee Commission
World Relief
Young Center for Immigrant Children's Rights
YWCA USA
Zonta USA Caucus

State

Alaska Network on Domestic Violence and Sexual Assault
Americans for Immigrant Justice
Arizona Coalition to End Sexual and Domestic Violence
Arkansas Immigrant Defense
Asylum and Human Rights Clinic at the University of Connecticut School of Law
Boston Area Rape Crisis Center
California Collaborative for Immigrant Justice (CCIJ)
California Partnership to End Domestic Violence
California Women's Law Center
Capital Area Immigrants' Rights (CAIR) Coalition
Catholic Charities Community Services, Immigrant and Refugee Services, NY
Center for Safety & Change
Center Global, a program of the DC Center for the LGBT Community
Centro Legal de la Raza
Chicago Jews for Refugees Coalition
Children's Legal Center
Coalition for Humane Immigrant Rights (CHIRLA)
Colorado Asylum Center
Colorado Coalition Against Sexual Assault
Connecticut Alliance to End Sexual Violence
Delaware Coalition Against Domestic Violence (DCADV)
De Novo Center for Justice and Healing
Deaf Overcoming Violence through Empowerment (DOVE)
Delaware Alliance Against Sexual Violence, Inc.
End Domestic Abuse Wisconsin
Entre Hermanos
Family Violence Appellate Project
Farmworker Association of Florida
Florida Council Against Sexual Violence
Florida People's Advocacy Center
Georgia Asylum and Immigration Network
Greater Boston Legal Services
Haitian Bridge Alliance

Harvard Immigration and Refugee Clinic at GBLS
Human Rights At Home Clinic UMass Law School
Idaho Coalition Against Sexual & Domestic Violence
Illinois Coalition Against Domestic Violence
Immigrant Advocates Response Collaborative
Immigration Center for Women and Children
Immigrant Legal Advocacy Project
Immigrant Legal Center
Immigrant Legal Defense
Immigration Law Society at Drexel University's Kline School of Law
Iowa Coalition Against Domestic Violence
Jane Doe Inc. - MA Coalition Against Sexual and Domestic Violence
Jewish Activists for Immigration Justice of Western MA
Justice for Our Neighbors Michigan
Kansas Coalition Against Sexual and Domestic Violence
LAAID
Legal Aid Justice Center
Louisiana Advocates for Immigrants in Detention
Louisiana Coalition Against Domestic Violence
Louisiana Foundation Against Sexual Assault
Maine Business Immigration Coalition
Maine Coalition Against Sexual Assault
Maine Coalition to End Domestic Violence
Make the Road New York
Maryland Coalition Against Sexual Assault
Maryland National Organization for Women
Maryland Network Against Domestic Violence
Massachusetts Immigrant and Refugee Advocacy Coalition
Massachusetts Law Reform Institute
Michigan Coalition to End Domestic & Sexual Violence
Michigan Immigrant Rights Center
Michigan NOW
Missouri NOW
Montana Chapter of the National Organization for Women (NOW)
Montana Coalition Against Domestic and Sexual Violence
NARAL Pro-Choice Maryland
National Association of Social Workers – Ohio
National Association of Social Workers - Texas
National Organization for Women, Hollywood NOW Chapter
National Organization for Women - Oregon Chapter
Nebraska Coalition to End Sexual and Domestic Violence
Nevada Coalition to End Domestic and Sexual Violence
New Mexico Coalition of Sexual Assault Programs, Inc.
New Mexico Immigrant Law Center
New York Immigration Coalition
New York State Coalition Against Domestic Violence

New York State Coalition Against Sexual Assault
North Carolina Coalition Against Domestic Violence
North Carolina Coalition Against Sexual Assault
North Carolina Justice Center
Northern Illinois Justice for Our Neighbors
Northern Marianas Coalition Against Domestic & Sexual Violence
Northwest Immigrant Rights Project
NY-Justice for Our Neighbors
Oasis Legal Services
Ohio Alliance to End Sexual Violence
Ohio Domestic Violence Network
Ohio National Organization for Women
Ohio Women's Action Network
OneAmerica
PA Stands Up
Pennsylvania Coalition Against Domestic Violence
Pennsylvania Coalition Against Rape
Refugee Services of Texas
Rhode Island Coalition Against Domestic Violence
Rian Immigrant Center
Rocky Mountain Immigrant Advocacy Network
Sacred Steps Labyrinth Works!
San Antonio Region Justice for Our Neighbors Border Project
Sanctuary for Families
SD Network Against Family Violence and Sexual Assault
SEIU-UHW
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
Social Justice Collaborative
South Carolina Coalition Against Domestic Violence and Sexual Assault
SPLC Action Fund
Still Waters Anti-Trafficking Program
Stopping Domestic Violence (stoppingdomesticviolence.org)
Sudanese American Community Organization
TASSC (Torture Abolition & Survivors' Support Coalition) International
Texas Association Against Sexual Assault
Texas Civil Rights Project
Texas Council on Family Violence
The Children's Partnership
The Legal Clinic Hawaii (JFON)
The Women's Law Center of Maryland
U.S. National Committee for UN Women
University of Illinois Immigration Law Clinic
University of Maryland Carey Immigration Clinic
Utah Jews for Refugees
Vermont Immigrant Assistance
Vermont Network Against Domestic and Sexual Violence

Violence Free Colorado
Virginia Poverty Law Center
Virginia Sexual & Domestic Violence Action Alliance
Washington Defender Association
Washington State Coalition Against Domestic Violence
West Virginia Coalition Against Domestic Violence
Wisconsin Coalition Against Sexual Assault
Women Watch Afrika, Inc.
Women's Law Project
WY Coalition Against DV and SA
Wyoming Coalition Against Domestic Violence and Sexual Assault
YWCA Southern Arizona

Local

Abuse & Rape Crisis Center, Inc
Acadiana Advocates for Immigrants in Detention
Advocate Safehouse Project
Advocates of Routt County
African Advocacy Network
African Services Committee
AIDS Legal Referral Panel
ALDEA - The People's Justice Center
American Gateways
Apna Ghar, Inc. (Our Home)
Apostle Immigrant Services
Arizona Hispanic Community Forum
Arizona Justice for Our Neighbors
Asian Law Alliance
Asylum Works
Ayuda
Barrier Free Living Inc.
Bay Area Asylum Support Coalition (BAASC)
Becker & Lee LLP
Berks Stands Up
Bloomington Immigration Justice Task Force
Boston University School of Law Immigrants' Rights & Human Trafficking Program
Bridges Clinic
Brooklyn Defender Services
Broward for Progress
Caritas of Austin
Carliner & Remes, PC
Catholic Migration Services, Inc.
Center for New North Carolinians - UNCG
Center for Social Justice, Seton Hall University School of Law
Central American Resource Center of Northern California (CARECEN SF)

Central American Resource Center (CARECEN of California)
Central Arizona National Lawyers Guild
Central Louisiana Democratic Women
Central New York Chapter of the National Organization for Women
Centre Safe
Charlottesville NOW (National Organization for Women)
Church World Service- Lancaster office
Cleveland Jobs with Justice
Community Legal Center
Community Resources of Fayette County, INC.
Contra Costa NOW
COS Community Development Corp, DBA Transformations CDC
Crime Victim Services
Crisis Intervention Service
Daya Inc.
DC Volunteer Lawyers Project
Democratic Women's Club of Palm Beach County
Dolores Street Community Services
Domestic Violence Intervention Program
El Pueblo, Biloxi, MS
Elevation Law LLC
Elkind Alterman Harston PC
Emerald Isle Immigration Center
Equal Access Legal Services
Esperanza Immigrant Right Project, CCLA Inc.
Family Crisis Centers, Inc.
Family Resources
Farmworkers Self-Help
FFI Desert Support for Asylum Seekers
Friends of the Family
Gender Equality Initiative in International Affairs
Gian-Grasso, Tomczak, & Hufe, PC
Greater Hartford Legal Aid
Greater Washington Jewish Coalition Against Domestic Abuse (JCADA)
Healing Abuse Working for Change
Heartly House, Inc.
Her Justice
Hope CommUnity Center
HopeWorks of Howard County
Houston Immigration Legal Services Collaborative (HILSC)
Human Rights Initiative of North Texas
Iglesia Piedra Viva UMC
Immigration Law Clinic University of Pittsburgh School of Law
Indivisible Cenla
Indivisible St Johns FL
Interfaith Action of Central Texas (iACT)

International Human Rights Law Clinic, American University Washington College of Law
James House
JCFS Chicago
Jewish Family & Children's Service of Greater Boston
Jewish Family Service of Greater Dallas
Jewish Family Service of Los Angeles
Jewish Justice Advocates of Temple Beth El of South Orange County, Ca.
Just Neighbors
Justice for Our Neighbors Houston
Kitsap Immigrant Assistance Center
Law Firm of Jennifer Scarborough
Law Office of Aubra Fletcher
Law Offices of Stephen C. Zollman
Lawyers' Committee for Civil Rights of the San Francisco Bay Area
Lee County National Organization for Women
Lee OFA Indivisible
Legal Aid Society of San Mateo County
Legal Services for Children
Legal Services NYC
Los Angeles Center for Law and Justice
Los Angeles County Bar Association - Immigration Section
Los Angeles LGBT Center
Loyola University New Orleans College of Law
Lutheran Social Services of New York
M0060 Columbia Area National Organization for Women
McCrummen Immigration Law Group
McHenry County NOW
Meadowlark Immigration PC
MH Immigration Consulting
Migrant and Immigrant Community Action Project
Mobilization for Justice
Monroe County National Organization for Women
Morris Law Group, PC
Mujeres Unidas y Activas
National Council of Jewish Women - Greater Philadelphia
National Council of Jewish Women Chicago North Shore Section
National Federation of Business and Professional Women's Clubs-NYC
National Lawyers Guild - San Francisco Bay Area
National Organization for Women, Hollywood Chapter
Neighbors Link
New Beginnings APFV (formerly The Association for Prevention of Family Violence)
NMIC
North Brooklyn Coalition Against Family Violence
North Jersey Sierra
Northern New Jersey NOW
Northwest Philadelphia Immigrant Action and Mobilization

NOW SGV, CA
NWI Resist
Open Door Legal
Partnerships for Trauma Recovery
SW PA NOW
Project Hope of Gunnison Valley
Quinnipiac University School of Law Clinic
Rape Victim Advocacy Program
Re-Establish Richmond
Reach Counseling
Refugee Resettlement Ministry of St. Martin-in-the-Field
Response
Rise Above Violence
Rockland County Immigration Coalition
Sacramento Food Bank & Family Services, Catholic Charities of Sacramento
Safe Harbor Project, Brooklyn Law School
Safe Haven of Greater Waterbury
Safe Horizon
Sakhi for South Asian Women
San Antonio Region Justice for Our Neighbors
San Diego Volunteer Lawyer Program, Inc.
Sanctuary for Families
Santa Fe NOW
Sexual Assault Resource and Counseling Center (SARCC)
Secular Jewish Community & School
Sinai Health System
Snohomish Immigration Advocacy
So Cal Immigration Project
Southern Md Center for Family Advocacy
Southwest Detroit Immigrant and Refugee Center
Southwest PA National Organization for Women
Southwestern Law School Legal Clinic
Step Forward Foundation
Stepping Stones, Inc.
Sullivan County Victim Services
TakeRoot Justice
Tallahassee NOW
The Center for Family Justice
The Door
The Florence Immigrant & Refugee Rights Project
The Kota Alliance
The Legal Aid Society (New York)
The Legal Project
The LGBT Asylum Project
The Nest Community Health Center
The Rebuild, Overcome, and Rise (ROAR) Center at the University of MD, Baltimore

The ReSisters of Central Ohio
The Safe Center LI, Inc.
Thrive Virginia
Transformations CDC
Transitions of PA
Uncage and Reunite Families Coalition
University of Miami School of Law, Human Rights Clinic
University of the District of Columbia Immigration & Human Rights Clinic
UnLocal, Inc
Urban Justice Center Domestic Violence Project
Vera House, Inc.
VIDA LEGAL ASSISTANCE INC
Villacorta Law, P.S.
Volunteers of Legal Service
West Pinellas National Organization for Women
Wilkes Legal, LLC
WILPF Greater Philadelphia Branch
Womankind
Women and Families Center
Women and Gender Advocacy Center
YMCA of Greater Houston
YWCA Greater Portland
YWCA of Alton
YWCA of Pierce County
YWCA South Hampton Roads