



October 18, 2023

**Testimony of Commissioner Manuel Castro
NYC Mayor's Office of Immigrant Affairs**

Before the New York City Council Committee on Immigration

**Oversight Hearing: Meeting the needs of Asylum Seekers in
NYC**

Good afternoon, Chair Hanif and members of the Immigration Committee. Thank you for holding this hearing. My name is Manuel Castro, I am the Commissioner of the Mayor's Office of Immigrant Affairs (MOIA). I am joined for Q&A by Tom Tortorici, Executive Director of Legal & Support Initiatives in my office, and Masha Gindler, Executive Director of the Asylum Application Help Center at the Office of Asylum Seeker Operations (OASO).

Interagency Response

NYC continues to lead the nation in its response to this unprecedented humanitarian emergency, with a coordinated, multi-agency effort that humanely meets the immediate, medium- and long-term needs of those who have arrived amidst this immigration crisis. Legal assistance is one of the most critical needs facing asylum seekers.

Legal

The day asylum seekers enter the country the clock starts ticking. Asylum becomes much harder to obtain a year after entry. The federal guarantee of legal representation regardless of ability to pay that is a right for those facing criminal charges does not apply for individuals and families facing deportation proceedings. I don't have to tell you that the stakes are just as high. Asylum seekers face violence or even death in their home country due to their political opinion, color of their skin, who they love, and a variety of other factors that our country embraces as values and protected by US law.

None of that matters in the eyes of the federal government if an asylum seeker lacks the legal resources to put these claims on paper and present them to an immigration judge or USCIS officer. That's why New York City has invested more than \$65 million dollars annually into immigration legal services, recognizing that these services are a tool of empowerment for immigrant New Yorkers and their families, including new arrivals. Legal services can help immigrant New Yorkers stabilize their immigration status and access jobs, health insurance, and education, ultimately benefiting our city and country as a whole. The return on the City's investment is greater than dollars and cents. These are families that will be able to move into their first apartment in our city or anywhere in our state or country, putting them on the path to independence and the opportunity to reach for the American dream.

Because of these strategic long-term investments and the hard work of a dedicated core of practitioners, the nonprofit immigration legal services field in New York City is the most robust in the nation. Even still, the field did not and does not have the capacity to fully address the urgent needs of the asylum seekers on its own. That's why Mayor Adams has left no stone unturned to ensure that these new New Yorkers get the legal support necessary to thrive.

From the first bus arrivals last year, City-funded immigration legal service providers at Port Authority, the Asylum Seeker Navigation Center, and community-based locations citywide showed thousands of newly arrived asylum seekers how to navigate their case. The orientation sessions and one-on-one meetings helped people comply with ICE check-in requirements, attend Immigration Court hearings, change their address, and better understand their case.

Due to the influx of new arrivals and support our community-based mayor partners, the administration Mayor Adams and the Office of Asylum Seeker Operations then launched the Asylum Application Help Center, which is helping asylum seekers complete and file their applications. This innovative and first-of-its-kind model leverages partnerships with experienced immigration attorneys, paralegals, city employees, and most recently students from academic institutions to assist asylum seekers file their applications and putting them one step closer to work authorization. Since the center launched in June, we helped file over 5,600 federal asylum applications. The number of people actually helped is greater than the number of applications filed, since eligible immediate family members may be included in a single application. The first wave of asylum seekers who filed their federal asylum application at the help center become eligible for their work permits in the next couple months. The New York State government, seeing the success of this operation, recently announced has allocated an additional \$38 million to bolster the city's efforts to provide legal services and expand the application center's model to help Venezuelans and others apply for Temporary Protected Status, or TPS.

Additionally, the New York City Department of Social Services and NYC Health and Hospitals staff recently conducted a comprehensive survey to identify asylum seekers who are eligible for work authorization. Our assessment is ongoing and we will share an update upon completion in the next few weeks. This work is important because it will allow us to connect people to the federal government work authorization clinic or appointments at the Asylum Application Help Center. Due to a lack of information shared with humanitarian parolees at the border and barriers to submitting the work permit application, humanitarian parolees in shelter might easily have missed out on the opportunity to immediately apply. The City, in partnership with the Federal and State government and nonprofit providers, scheduled eligible individuals for legal assistance clinics, helping more than 1,700 humanitarian parolees apply for work authorization.

On August 10, the Adams administration also allocated \$5 million in new funding for the Asylum Seeker Legal Assistance Network (ASLAN), expanding access to immigration legal information, orientation, individual consultations, brief advice, and application assistance for asylum seekers citywide. Through this initiative, services are provided at more than 13 community-based legal service locations citywide and remotely, and the City's Immigration Legal Hotline has been expanded to handle higher call volumes and longer call durations. Importantly, ASLAN will help build the City's longer-term human capacity to provide immigration legal services. Through a partnership with CUNY, CUNY Law student attorneys, under the supervision of their professors, start their placement this week at trusted community-based organizations called Resource Navigation Centers, and our legal partners that form part of the Pro-Se Plus Project are ramping up their operation to conduct application assistance events and supplement the existing service array.

Continued Advocacy

As this administration has said time and again, New York City cannot do this alone. Asylum seekers are facing bureaucratic and procedural hurdles imposed by the federal government that limit their success and the wellbeing of their families. I have repeatedly joined Mayor Adams and other mayors throughout the country

participating in Cities for Action in a national call to our federal government to provide much needed support and use every tool at their disposal to create safe, orderly and humane pathways to stability, both for those who are already here as well as our newest arrivals.

Since the last time I testified before you, the federal government has heeded our call in a few key areas. Mayor Adams led the Cities for Action coalition in sending a letter to the Department of Homeland Security signed by over thirty U.S. mayors in early September calling for expanded access to Temporary Protected Status (TPS) protections for immigrants from eleven countries. Two of those countries – Venezuela and Cameroon – were redesignated for TPS in the weeks that followed.

Venezuelan asylum seekers, fleeing an increasingly repressive government and historic economic collapse over the last decade, make up about forty percent of the asylum seekers that New York City has interacted with at the Arrival Center and other touchpoints. Those that entered before July 31, 2023 are now eligible for TPS and therefore may immediately apply for work authorization. The City has already begun ramping up an operation – in collaboration with trusted legal service providers – to ensure that everyone who meets the eligibility criteria is given the necessary application assistance and subsequent guidance. We continue to advocate that the federal government extend TPS for additional nationalities to cover more asylum seekers in our care.

New York City will continue to lead the way. Cities around the world look to our leadership. This leadership is driven by our values and personal experiences. Let me make this clear: this administration will never stop advocating for the well-being of asylum seekers and all immigrant New Yorkers. We know that every dollar spent supporting them will benefit our great city and country in the long run.

Conclusion

Finally, it is critical that the council, the state, and the federal government join the Mayor's Office of Immigrant Affairs and the administration to further confront the challenges of this complex humanitarian emergency. Our office looks forward to the Council's partnership in calling on the federal and state government for support.

Thank you and I look forward to your questions.



Brooklyn Defender Services
177 Livingston St, 7th Fl
Brooklyn, NY 11201

Tel (718) 254-0700
Fax (718) 254-0897
info@bds.org

TESTIMONY OF:

Ellen Pachnanda, Director Immigration Practice

BROOKLYN DEFENDER SERVICES

Testimony before New York City Council

Committee on Immigration

Oversight Hearing on Legal Services for Asylum Seekers in

New York City

October 18, 2023

My name is Ellen Pachnanda and I am Director of Brooklyn Defender Services' Immigration Practice. Brooklyn Defender Services (BDS) is a public defense office whose mission is to provide outstanding representation and advocacy free of cost to people facing loss of freedom, family separation and other serious legal harms by the government. For over 25 years, BDS has worked, in and out of court, to protect and uphold the rights of individuals and to change laws and systems that perpetuate injustice and inequality. We want to thank the City Council for its commitment to the diverse members of the immigrant community in New York City and to the Committee on Immigration and Chair Hanif for your continued focus on providing asylum seekers with legal services.

BDS represents approximately 22,000 people each year who are accused of a crime, facing the removal of their children, or deportation. BDS is fortunate to have the support of the City Council to supplement the services we provide as a public defender office in Brooklyn. Through specialized units, we provide extensive wrap-around services to meet the needs of people with legal system involvement, including civil legal advocacy, assistance with educational needs of our clients or their children, housing, and benefits advocacy, as well as immigration advice and representation.

Brooklyn ^(BDS) Defenders

BDS' Immigration Practice protects the rights of immigrant New Yorkers by defending against ICE detention and deportation, minimizing the negative immigration consequences of criminal and family charges for non-citizens, and representing immigrants in applications for immigration benefits. We represent people who are applying for immigration relief before U.S. Citizenship and Immigration Services (USCIS), and in removal proceedings in New York's immigration courts. Since 2009, we have counseled, advised, or represented more than 19,000 clients in immigration matters including deportation defense, affirmative applications, advisals, and immigration consequence consultations in Brooklyn's criminal court system. BDS is one of three New York Immigrant Family Unity (NYIFUP) providers, specializing in representing people who are detained while they await their deportation hearing. Since the inception of the NYIFUP program in 2013, we have represented over 1,700 people in detained deportation proceedings.

Providing Full Service Legal Assistance to Immigrant New Yorkers

First and foremost, we are committed to continuing to provide the robust and comprehensive legal representation needed for people facing removal, including assisting any asylum seekers who might end up in detention. We thank the City Council for its continued commitment to the NYIFUP program and implore that any new initiatives complement our current work of representing individuals with complex immigration matters.

Our Immigration Practice specializes in representation for immigrants with other legal system involvement. Because of the way we police poverty as a society, far too many immigrant New Yorkers find themselves involved with the criminal and family regulation systems that complicate available immigration relief. BDS' attorneys have the experience and expertise to advise and represent people in a wide range of immigration, criminal legal, and family court matters, in addition to our NYIFUP work. We identify and apply for affirmative immigration relief for our clients with complex immigration cases who require a coordinated strategic legal plan to ensure the best outcome for them and their families. We also assist our clients in applying for employment authorization and other documentation assistance which enables our clients to access health insurance, public assistance, and higher education opportunities. In addition, we take on some cases that are referred from community-based organizations or through our own community outreach.

Full Legal Representation for Newly Arriving Immigrants in New York

With respect to those who have recently immigrated to the United States and have now arrived in New York City, we urge the City Council to ensure that there is sufficient funding for both brief advice and full legal representation because the needs of individuals and capacity for people to navigate the byzantine immigration system varies widely. In addition, the legal services these communities need extend beyond immigration application assistance; they are

Brooklyn ^(BDS) Defenders

more likely to face barriers based on their immigration status in a wide range of areas including access to temporary shelter, employment discrimination, landlord harassment, and difficulty accessing benefits where temporary, or pending, immigration status can cause erroneous ineligibility determinations.

Prioritizing funding for full representation in complex immigration cases means ensuring we can continue to provide multidisciplinary services for our immigrant clients and their families. In terms of our interest in providing additional services, BDS believes our expertise lies in the complex legal issues that arise in an immigration case. Issues such as contact with the criminal legal system or the Administration for Children's Services, prior deportation orders, mental health concerns, and the coordination of pursuing multiple forms of immigration relief for any given individual or family are spaces where our unique expertise comes into play.

BDS represents newly arrived immigrants across each practice in our office—from those with criminal and family cases in Kings County, to those detained by ICE following minor criminal charges. We represent these clients in detained and non-detained proceedings in Immigration Court. Increased funding for full representation means the ability to represent individuals well beyond filing an application for asylum or work authorization. This is especially critical with the complex immigration matters, where immigration providers are not included to represent individuals with criminal and family involvement.

While the city has made a significant effort to provide urgently needed immigration legal services to the thousands of newly arrived immigrants to this city, we know that many of these people will need continued legal assistance in their filed legal applications. We can expect that the majority of the people who filed asylum applications will need further legal assistance to defend their applications and seek legal status in the US.

While these initiatives may be important first steps for immigrants, they do not ensure that people will have representation to help them fight for work authorization or prove their asylum case when it is referred to Immigration Court after being denied by USCIS. As the Council knows, once an asylum application is filed, the burden rests with the non-citizen to prove that they are eligible for asylum. The city has been instrumental in ensuring that more than 5,600 people filed applications for asylum, yet the chances of success are very minimal absent legal representation. In FY 22, only 18% of *pro se* respondents won asylum; compared to a 49% grant rate for respondents with legal representation.¹ According to the VERA Institute of Justice, people in detention who are represented by lawyers in immigration court are 10.5 times more likely to establish their right to remain in the United States. For non-detained people, 60 percent

¹ TRAC Immigration. Speeding up the asylum process leads to mixed results. (2022). Available at <https://trac.syr.edu/reports/703/>

Brooklyn ^(BDS) Defenders

with lawyers win their cases compared to 17 percent of those without lawyers.² Thus, the vast majority of individuals with asylum applications who will ultimately appear *pro se* in court will be ordered removed and if not removed immediately, will lose work authorization and benefits.

Conclusion

We urge the City Council to continue to fund full-representation models while scaling up clinics to provide emergency services. Organizations that are stable and well-staffed can step in when a crisis occurs and assist immigrants and address a particular situation as it arises. Unlike other types of legal work that can be fairly stable over time, we have seen that the needs of immigrants in New York City do not follow a pattern. There is always a new situation that needs to be addressed and legal services providers need to be properly funded and staffed with experienced attorneys, paralegals, and other staff to perform critical work on a short timeline. In recent years, as an example, we handled the Muslim ban at JFK International Airport, the Haitian earthquake, family separation at the US border, the surge of young people crossing the US border, and now asylees being sent the New York City, Ukrainian and Russian people seeking safety from the war, a large influx of Venezuelan people and still the usual deportations and removals, some of which are for people who have been in the United States for decades. A deep and continuing commitment to funding our services over time would allow us to be nimble and provide flexibility for the city to meet the needs of its residents and their families.

Thank you for taking the time to engage with providers around these important issues. We look forward to continued conversations and collaborations both on our existing programs as well as new initiatives being developed to meet the legal services needs of our city's immigrant community.

If you have any questions, please feel free to contact me at EPanchnanda@bds.org.

² Ingrid V. Eagly and Steven Shafer. A national study of access to counsel in immigration court. *U. Pa. L. Rev.* 164 (2015): 1.



Testimony

New York City Council Immigration Committee Legal Service for Asylum Seekers Wednesday, October 18, 2023

Submitted by Kelly Agnew Barajas, Immigrant and Refugee Services Division
Catholic Charities Community Services

Good afternoon Chair Hanif, Council Members and staff, I am Kelly Agnew-Barajas, Director of Refugee Services at Catholic Charities Community Services. Thank you for the opportunity to testify before you today and thank you for shedding additional light on this very important issue.

In the past year, Catholic Charities Community Services (CCCS), and the Satellites sites that we contract with have collectively served at least nearly 35% of the 126,000 new arrivals. So as we offer this testimony, we do so from a well-informed position.

Catholic Charities has long been serving the immigrant and refugee community through our Immigrant & Refugee Services Division. In typical years we serve close to 30,000 immigrants and refugees—through immigration legal services which include pro bono and Immigration Court Helpdesk programs, integrated legal services in NYC schools through Action NYC, social supports, integration and resettlement, day laborer programs, ESL, family reunification, and services for unaccompanied children. We are also proud to provide information and referrals to over 86,000 callers through our immigration information and assistance hotlines annually.

Through an extensive network of outreach, legal, and education services in New York City and Lower Hudson Valley communities, we continue to come into contact with, and have come to know and understand the many needs and realities facing workers, families, children who have recently arrived and are facing removal as well as the needs of long-time residents with no status. Our work with day laborer groups and work collectives in the Bronx and in Yonkers—our day-to-day engagement with *jornaleros* on workplace rights and safety—gives us a unique perspective on their needs and realities.

Overview

Earlier this year, Catholic Charities Community Services worked closely with New York City to coordinate and operate the Asylum Seeker Resource Navigation Center (ASRNC). We provided basic intake, Case Management, assessments, and referrals for other services, including legal, food pantry, and OSHA trainings. But our support of this community began much earlier, in the Spring

of 2022 when CCCS began receiving recently arriving asylum-seekers at our Central Office located at 1011 1st Avenue, where our executive management, fiscal, and human resources are housed.

The needs of many continue to be safe shelter, clothing, food, diapers, transportation, legal representation and orientation, and access to medical services. Stability and steady employment are the highest of priorities for these families. As the completion of the 40-hour course and the provision of a Site Safety Training card is a requirement for those seeking work on a construction site in NYC, the demand for OSHA/SST trainings has grown. At our hub site in the South Bronx, we have received over 200 workers looking to be placed on our training wait list and 100 of those arriving directly to our Day Laborer Center, searching for assistance with emergency needs described above.

As many of these newer arrivals do not have any existing community ties or networks, and little to no income, their needs are even more acute during the 40-hour trainings. This includes assistance during training for food, childcare, and transportation to from their temporary shelters (which can change overnight) to our location in the Bronx. Additionally, as new arrivals are unaware of many systems here in the US, many of them are falling prey to job scams and are not knowledgeable about how to protect themselves from wage theft. To date, CCCS has providing orientations on these topics at our center at 1011 First Avenue and at all of our SST 40-hour training sessions.

Legal Services

Immigration Legal Services:

In the last year, just over 11,000 individuals received legal services from CCCS, the majority of whom were new arrivals seeking asylum or other permanent relief in the U.S. Newly arriving asylum seekers receive services ranging from one touch initial consultations, to limited scope application assistance, to full and comprehensive legal representation. However, capacity to serve this population is stretched to its limit as the sheer numbers of new arrivals is compounded by the fact that NYC immigration legal service providers have also been facing serious recruitment challenges for new, qualified immigration attorneys. As a result, hundreds of newly arriving migrants must be placed on various waitlists to await their turn for an opportunity to access legal services.

Within this context, Catholic Charities asks for increased public support that will allow it to expand capacity and bring vital and comprehensive legal services to newly arrived migrants:

- **Increase access to DOJ Accreditation:** As part of a nationwide initiative to address the shortage of licensed immigration attorneys, many legal service providers and stakeholders are exploring new initiatives to increase capacity to provide quality legal services. Department of Justice Accreditation is an avenue by which recognized organizations can apply to accredit their non-attorney legal staff, making them legally authorized to practice immigration law partially or fully before the Department of Homeland Security and/or the Executive Office for Immigration Review for as long as they are employed at said organization. Initiatives such as these not only provide incentive to new employees to remain on staff for an extended period, but also allow legal programs to supplement fully licensed attorney capacity with additional capacity to

take on more cases for full representation under accredited representatives. There is some momentum to allow accredited representatives to *in lieu of* fully licensed attorneys on legal contracts, but the capacity concern can only be addressed if we are supporting expansion on both lines. An increase in existing or new discretionary funding to support these initiatives would allow CCCS to provide immediate opportunities to accreditation for non-attorney legal staff, both in support for the requisite training required and in the required salary increase to support additional responsibilities.

- **Multi-year funding for full representation:** While the recent push to provide limited scope or *pro se* services to meet the most urgent needs of filing asylum applications within the one-year deadline and work authorization applications on the basis of pending asylum or TPS applications is necessary, this is only a short-term solution to the legal needs this particular newly arrived population faces. By virtue of their arrival, the majority are in active removal proceedings before the immigration courts. The *pro se* applications provide much needed support for stability through work, as well as temporary protection from deportation in the case of TPS, but it remains statistically factual that immigrants in removal proceedings have a significantly higher chance of winning their case when fully represented. An asylum application, a form, is really only this first step in a years-long process and by itself is not enough to win these cases. As noted above, legal service providers are facing massive capacity restraints as the demand far outweighs the resources. This is compounded by the fact that immigration cases in court can last up to 10 years. Due to the constantly changing nature of policy and protocol in court, many newly arriving families will continue to face multiple challenges navigating this system to ensure the most permanent option for stability in the U.S. We support the city's response to increase access to immediate application assistance, but additional funding for full representation through multi-year awards that take into account the complex and long-term nature of removal defense immigration needs is the next step in a long-term solution to stability and success for newly arrived migrants in New York City.

After much advocacy by New York City, State and the service providers, the U.S. Department of Homeland Security announced the extension of redesignation of Temporary Protected Status for Venezuelans who entered the U.S. before July 31, 2023, there will be a new need for legal services for this group.

Currently, our legal services consist of several touch points for this community. CCCS' ActionNYC in Schools Team had been redeployed by the Mayor's Office for Immigrant Affairs to serve at the Asylum Seeker Resource Navigation Center, where they provided direct immigration legal services to bused asylum seekers 2-3 days per week. Our Immigration Court Help Desk (ICH) and Family Group Legal Orientation Program (FGLOP) are legal service delivery models co-located at the three NYC Immigration Courts. These programs have been inundated with the demand for legal services and are committed to provide immediate information to the recent arrivals through legal triage, individual legal consultations, friend of the court services, and *pro se* application assistance to meet one-year asylum filing deadlines, file time-sensitive motions, reopen improper removal notices, request changes of address and continuances, and for other urgent filings before the court. Furthermore, our Community Legal Clinic (CLC) – a

mobile legal clinic model which rotates throughout NYC and the Hudson Valley also has seen a significant increase in busied migrants seeking access to legal information and representation.

The bottom line is that as hopeful as the news about TPS for Venezuelans is, the need for competent legal services continues to grow. We need comprehensive investments in legal services and additional resources to community groups and nonprofits to address social service needs.



**Testimony submitted to the Committee on Immigration, New York City Council
Wednesday, October 18, 2023, 10:00am**

Re: Oversight - Legal Services for Asylum Seekers in New York City

Good afternoon. Thank you to Chair Hanif, the Committee on Immigration, and Legislative Director Andrea Vazquez and Deputy Director for Governmental Affairs Rachel Cordero for their comprehensive and engaging briefing paper published today. We appreciate your repeated and steadfast commitment to raising awareness for the need for high-quality free legal services for immigrant New Yorkers.

My name is Terry Lawson and, along with my co-founder and co-executive director, yesterday we launched Co-Counsel NYC, a new nonprofit legal services organization that seeks to transform our collective capacity to navigate complex legal systems and support safe, thriving, and engaged immigrant communities. Co-Counsel will partner with community members, community-based organizations, law firms, and companies to respond to the emerging and complex legal needs of immigrant communities. Having listened to our partners in the private and nonprofit sectors and drawing on our many years of expertise, our trauma-informed model provides co-counseling, supervision, mentoring, clinic facilitation, and training on immigration and family law matters.

We imagine an innovative approach, joining forces with law firms, businesses, and community-based organizations to expand access to high-quality legal services, including both *pro se* and full representation, and increasing training opportunities to assist individuals seeking asylum, TPS, work authorization, U visas, Special Immigrant Juvenile Status, and many more forms of immigration relief. We have heard from many advocates in the private and nonprofit sectors who wish to take on this work but have reasonable anxiety about doing so. Co-Counsel plans to provide substantive training, supervision, and co-counseling required to reduce and manage risk for everyone.

We believe that access to high-quality legal representation for immigrant New Yorkers must be expanded, and that immigrant New Yorkers are fierce advocates through the US immigration system when equipped with the right tools and support. We believe there must be direct investment in the know-how and power of immigrant communities, community-based partners,

224 W 35TH St, Ste 500 #269, NY, NY 10001

917.520.1956

<https://cocounsel.org>



and legal services providers who are experts in the field. This investment must extend beyond initial asylum, TPS, and EAD applications filed.

The many important efforts of our colleagues in legal services organizations are robust and effective, and still much remains to be done to ensure that immigrant New Yorkers have access to high-quality legal information and full representation. Expanding access to free legal services by investing in experts in the field who train, supervise, and co-counsel others reduces the likelihood that the individuals and families will be scammed by *notario* fraud or other bad actors who take advantage of people's desperation for assistance. We echo the call for long-term investment in community legal services by the City Council and this Administration.

224 W 35TH St, Ste 500 #269, NY, NY 10001
917.520.1956
<https://cocounsel.org>



COMMUNITY HEALTH CARE ASSOCIATION of New York State

New York City Council Committee on General Welfare
Oversight Hearing: Asylum Seeker Response Efforts - Costs and Projections
October 24, 2023

The Community Health Care Association of New York State (CHCANYS) is grateful for the opportunity to provide written testimony to the New York City Council. CHCANYS is the statewide primary care association representing New York's 70+ federally qualified health centers (FQHCs), also known as community health centers (CHCs).

Located in medically underserved communities, CHCs provide high quality primary care to everyone, regardless of ability to pay, insurance coverage, or immigration status. NYC's community health centers serve more than 1.2 million patients at 490 sites across the city. Community health centers are a vital safety net for quality affordable healthcare services for many New Yorkers who otherwise wouldn't have access to healthcare. CHCs serve populations that, historically, the traditional healthcare system has failed. Among NYC CHC patients, 83% are Black, Indigenous, and People of Color, 92% live at or below 200% of the federal poverty line, 68% are on Medicaid and/or Medicare, and 12% are uninsured.

CHCs play a vital role as a safety net for asylum seekers in New York, offering essential healthcare and social services that enable individuals to make informed decisions about their well-being. Since Spring 2022, 126,000 asylum seekers have arrived in New York City with a record 4,000 arriving during the week of October 9th, 2023. CHCs are facing extreme financial pressures due to additional cost burdens for the care and services they provide to asylum seekers, as most of these health care visits and services are unbillable. Many challenges remain in coordinating care, tracking services, information sharing, insurance eligibility, obtaining work permits, obtaining legal services, providing social supports, and identifying funds for uncovered services. Asylum seekers are presenting with complex health issues and mental health concerns. New York City must invest in and expand programs to meet asylum seekers' needs while supporting the community health centers providing these critical services. By doing so, we can foster a more inclusive and supportive environment where every individual has access to the care they deserve.

Lack of Coverage for Services Provided by CHCs to Asylum Seekers

CHCANYS recently surveyed community health centers (CHCs) throughout the state to better understand the current efforts and difficulties in providing and coordinating care for asylum seekers. The survey closed on September 1st, 2023, and 25 CHCs representing the Bronx, Queens, Manhattan, Brooklyn and upstate reported screening or providing health care services to asylum seekers in the 2-week period preceding the survey in mid-August. The survey data highlighted the difficulties faced by asylum seekers and health centers alike. While some asylum seekers qualify for temporary protected status (TPS) or have filed the appropriate legal paperwork to allow them to be enrolled in the NYS Essential Plan, many asylum seekers are missing the appropriate documentation that would verify their eligibility for public insurance programs. On CHCANYS' survey, health centers reported that 52.3% of asylum seeker visits were unbillable or will not be claimed for reimbursement; CHCs reported only 39.9% of asylum seeker visits would be claimed to Medicaid. This discrepancy in reimbursement is continuing to grow as more care services are provided to the record setting number of asylum seekers arriving in New York State. This additional financial stress on community health centers threatens the



stability of the safety-net care they provide, as they are already operating on thin margins and outdated Medicaid rates.

Even before the asylum seekers began arriving in the State, CHCs experienced unprecedented financial challenges. CHC Medicaid rates have not been updated beyond marginal increases since they were created based on costs in 1999 and 2000. Meanwhile, CHCs have experienced unprecedented rises in costs associated with personnel, benefits, equipment, and medical supplies. CHCs require additional resources to support the uncompensated care provided to asylum seekers to ensure they can continue to serve their communities.

The Mayor's office has dedicated resources to the health care system via the NYC Care program. However, although the NYC Council passed legislation (INT.1668-A) which was enacted October 10, 2021 that would have enrolled CHCs into the NYC Care program, the program eligibility has not expanded to date. Expanding NYC Care eligibility to include CHCs would allow NYC Care funding to flow to CHCs to support services provided to the asylum seeker population, most of which are unfunded.

Despite these financial pressures and challenges in coordinated clinical care, CHCs are steadfast in continuing to provide a robust safety net for all populations, including asylum seekers, as they have been for decades. According to CHCANYS' Survey, 53.5% of asylum-seekers seen by CHCs were living in hotels or motels requiring CHCs to bring mobile medical vans on site for clinical care. Continuity of care has been difficult as asylum seekers may have changes in the location of their housing and shelter. Additionally, a lack of medical documentation has made it difficult to verify which immunizations and screenings asylum seekers have received upon arrival in the country or NYC. 66% of CHC reported providing vaccinations to asylum seekers at the request of local health or school district officials. Children are being given full vaccination series to enable them to enter school, and adults are receiving vaccinations for communicable diseases, such as varicella.

Lack of access to technology for asylum seekers and CHCs alike are creating barriers to continuity of clinical care. Many asylum seekers lack dependable and consistent phone access, making communication and follow-up extremely difficult, especially in the event of missed appointments. The diverse population of asylum seekers has uncovered multiple language barriers that require translation services for languages other than English or Spanish, and CHCs often cannot provide those services with current staff. Visits involving a translator or translation service require more time and resources as compared to a standard visit.

Conclusion

CHCANYS is grateful for the opportunity to submit this testimony to highlight the services provided to the asylum seeker population by community health centers in New York, and the increasing logistical and financial difficulties health centers are facing in doing so. Community health centers need financial compensation to cover the unbillable services for the care that they will continue to provide asylum seekers. We look forward to working with the Council to address these needs. For questions or follow up, please contact Marie Mongeon, Vice President of Policy, mmongeon@chcanys.org.



Testimony: Susanna Saul, Esq., Director of Immigration Practice, Her Justice

Hearing: Oversight - Legal Services for Asylum Seekers in New York City

Host: Committee on Immigration, New York City Council

Date: October 18, 2023

Thank you to the Committee on Immigration, Chair Hanif, and the Council for the opportunity to address important issues related to the legal services needs of new migrants and the need to enhance services for all undocumented immigrants in New York City.

Her Justice stands with women living in poverty in New York City by recruiting and mentoring volunteer lawyers to provide free legal help to address individual and systemic legal barriers in the areas of family, matrimonial, and immigration law. Through our “pro bono first” model, our small legal team trains and mentors thousands of pro bono attorneys to assist our clients, bringing the power of the private bar to those who need it most. Since our founding 30 years ago, Her Justice has assisted more than 45,000 women and children in New York City. All our clients are women living in poverty, 90% are women of color and 80% are survivors of domestic violence. Our clients live in all five boroughs of New York City. More than half of our clients are foreign-born, one-third need interpreters in court, and most are mothers. We serve women living in poverty because, even in the best of times, the cards are stacked against them.

Advocating for policy reform in the civil justice system is a key component of any effort to lift women and their children out of poverty. Our policy work is informed by the lived experience of our clients – women whose livelihood and well-being are often determined by the civil justice system. The civil justice system is typically invisible to those outside of it, which makes a focus on elevating the reforms to this area that much more essential for our clients and all who depend on it.

Long-term, full representation Legal Services for Immigrants in New York City Are Critical

Our immigration practice has deep expertise providing free legal assistance to undocumented immigrants who have experienced domestic violence, sex trafficking, labor trafficking, and other forms of gender-based violence, as they seek to stabilize their immigration status in the United States. We are committed to providing long-term, full representation in these complex, high-stakes cases for those who need it. Her Justice attorneys both represent clients directly and mentor pro bono attorneys in their representation of clients in immigration matters, including VAWA self-petitions, petitions for U nonimmigrant status, applications to adjust status, waivers of the joint petition to remove conditions on residence, applications for naturalization, applications for T nonimmigrant status, and applications for employment authorization. Last year, attorneys working with Her Justice



provided legal information, advice, and representation on 2,135 immigration matters and secured legal status, and thus the right to remain in the U.S., for 238 clients and their children. Her Justice has a proven track record of excellent client services, and its impact grows every year.

Civil legal services are essential services, preventing greater crises for people living in poverty down the road. Pro bono legal services are a critical part of the solution to the current immigration legal services shortage. At Her Justice, we thoroughly screen each client and assess the available immigration remedies for each, including asylum. While we do not represent clients in asylum applications, we have strong partnerships with other organizations that do. Once screened, we match clients with pro bono attorneys for full representation in their immigration applications. We invest resources and create infrastructure to support pro bono attorneys, including hiring immigration legal experts as mentors. And our staff invests considerable time and resources to support clients and their pro bono attorneys during the many years – sometimes up to ten years – our clients wait for the processing and adjudication of their immigration applications.

Support from the City Council helps Her Justice to provide direct representation and skilled advocacy in an arena that often fails to adequately serve the legal needs of the marginalized. At Her Justice, we understand that our immigrant communities are an essential part of the fabric of our city and, for 30 years, have been committed to providing critical free legal services to women living in poverty who have experienced domestic violence. The SAVE, DoVE, and Speaker's Initiative funding we have received in the past has allowed us to provide critical legal services to low-income survivors of domestic violence and low-income immigrant women in New York City. As New York City welcomes another influx of migrants, those seeking asylum are already facing increasing court delays, putting their legal status at risk, and further widening the access-to-justice gap. While many of the recent migrants are applying for asylum, we cannot know whether they will be successful in their applications. We do know that gender-based violence is pervasive. During the years-long wait for a decision on their asylum cases, many migrants may become eligible for U visas, T visas and other immigration relief available to survivors of gender-based violence. With the City's support, we will provide legal services that are needed to bridge this gap. We hope the City Council will reaffirm and enhance resources to migrant women and recognize legal services as essential to ensuring their economic well-being and safety.

We know that without robust funding levels for legal services, undocumented immigrants will continue to be vulnerable to exploitation on many levels: by unlicensed individuals charging them thousands of dollars to file fraudulent applications that will lead to their removal from the United States, by labor traffickers and exploitive employers who will take advantage of workers without papers to extract labor and services without fair pay or any pay, by abusive individuals who will use citizenship privilege, violence and intimidation to control undocumented individuals in intimate partner relationships, by landlords who will charge exorbitant rents for unsafe and unhealthy housing conditions. By investing in holistic and robust legal services for the undocumented immigrant population, New York City can be a legal ecosystem where all migrants and immigrants can receive



the legal relief that they so need and deserve. With well-funded and fortified nonprofit and service providers meeting the needs of vulnerable immigrant populations, New York City can be well positioned to prevent deeper crises.

Immigrant Survivors of Domestic and Gender-Based Violence Face Barriers

The COVID-19 pandemic shed new light on the role that immigrant workers play in the U.S., with immigrants being overrepresented in frontline occupations and many undocumented immigrants in the labor force being classified as essential throughout the pandemic. Yet many work without the legal protections that would match the value of their contributions to the economy. Our immigrant clients – all of whom are survivors of gender-based violence – have been met with particular challenges during the last few years. Many of our immigrant clients work in homes – as home health aides and caregivers – and were unable to continue their work when the pandemic began. Due to unemployment, lack of access to federal stimulus benefits, and for other reasons related to poverty, our immigrant clients faced acute financial strain.

Her Justice advocates for reform to the immigration system so that the greatest number of immigrant women can obtain and preserve the best possible status, through a process that prioritizes their safety and dignity. We are particularly concerned about the delays our clients face in obtaining legal work authorization. Chronic under-resourcing of adjudications systems within U.S. Citizenship and Immigration Services (USCIS), compounded by operational challenges in the pandemic, cause processing delays that sometimes last five years or more, during which time our clients do not have any immigration relief – not even a work permit to support their families. These delays can lead to our clients' continued employment in unsafe work conditions at wages too low to support their families, and to instability in housing and even safety from intimate partner violence. Moreover, our undocumented clients whose immigration applications are pending for years and who do not yet have employment authorization are ineligible for unemployment insurance benefits.

Later this fall, Her Justice will issue an original research report synthesizing in-depth interviews with thirty immigration clients about the impact of work authorization on their lives, and delays in obtaining this critical relief. This report and our deep legal and policy expertise position Her Justice to engage in well-informed advocacy for reforms such as the enhancement of resources for USCIS to address adjudications backlogs and changes to related policies, along with State-level protections for healthcare and State and City funding for legal services for immigrants, so that immigrants' livelihood and eligibility for benefits are protected at a time they need this most. We welcome any remedy that can be put in place for all immigrants to expedite access to legal permission to work.

Meeting the Legal Needs of Immigrant Survivors in Family/Matrimonial Cases



For decades, Her Justice has prioritized the delivery of competent and culturally sensitive legal services to women living in poverty, including survivors of gender-based and domestic violence, who compose the majority of our clients. All of our immigration clients are survivors of gender-based violence. We provide life-changing legal services to hundreds of women each year, including undocumented immigrants, in the Family and Supreme Court/Matrimonial Courts. In recent years services for survivors of gender-based and domestic violence became even more critical as they were uniquely burdened by the economic impact of the COVID-19 pandemic, and the fallout is expected to last. During the past few years, it became clearer than ever that legal services, and the access to justice and the essentials of life that they offer are a critical part of the safety net for survivors of domestic violence.

Family Courts

Many of our clients must engage in the New York City Family Courts to get legal relief that is critical to their safety and well-being; for example, orders of protection, financial support from partners, or visitation or parenting time schedules. At the start of the pandemic the New York Family Courts reduced access to certain types of matters that it deemed “essential,” including applications for temporary orders of protection and motions for urgent issues in pending cases. While outside New York City, the Family Courts resumed operations more quickly, including the use of virtual proceedings, New York City Family Courts adjusted operations more slowly, resulting in extreme delays in assigning court dates for new child support petitions and new nonemergency custody/visitation petitions. Operations in the New York City Supreme/Matrimonial Courts also slowed. The inability to access these courts meant that certain critical court relief was unavailable to or unjustly delayed for many, including domestic violence victims. That delay is still felt today, in the form of long wait times between filing cases and seeing a judge, and dockets so large that judges struggle to keep up with them.

One of those areas deemed not “essential” in Family Court was child support. Child support is critical for custodial parents, especially those living in poverty. Many single mothers rely on child support to secure the basic necessities for their families. For some of the lowest income families, child support can represent more than 50% of their income. Thus, the child support system plays a critical role in determining economic justice for single mothers and children living in poverty. Yet more than 90% of parents in child support cases in the New York Family Courts do not have legal representation. Her Justice and our pro bono partners provide legal representation in child support matters and legal information; our services in this area are key especially given that our legal services colleagues typically are stretched too thin to represent individuals in standalone child support cases.

The vast majority of victims of partner violence suffer from economic abuse, making fair child support awards essential to survivors’ ability to seek safety and maintain independence. Like all those living in poverty, victims of domestic violence find themselves in an even more precarious economic situation following the pandemic. For survivors of domestic violence, uncertainty and delays in the



Family Courts allow abusive partners who owe child support to withhold payments without immediate accountability through the courts. Even accessing child support services and legal relief can put survivors at risk of harm since they must engage with abusive former partners.

Supreme Court/matrimonial cases

Her Justice, along with our pro bono partners, provides legal advice and representation to hundreds of women seeking a divorce each year. We are especially committed to helping our clients navigate the delays in the Supreme Court matrimonial parts resulting from the courts' slowdown in the pandemic. Going through a formal legal process in divorce is especially important for women who are typically the lesser-earning spouse. The legal process should ensure a fair child or spousal support award which gives single mothers a critical safety net. A fair divorce can be especially critical for victims of domestic violence, for whom financial stability is key to remaining free from abusive relationships.

As the Council is well aware, domestic violence takes many forms beyond physical abuse. Many of our clients experience financial abuse – the control by one intimate partner of the other's access to economic resources, which diminishes the victim's capacity to support themselves and forces them to depend financially on the abuser. In general, consumer debt and low credit scores trap women in poverty. These financial barriers may impose particular challenges if the debt arose from partner abuse, such as the withholding of assets, identity theft, and coercive debt. Debt and damaged credit as a result of financial abuse make it even more difficult for victims to leave the relationship – with a low credit score, women cannot rent an apartment, get a job or buy a house or car.

To address the economic abuse that our clients and many survivors experience, Her Justice developed consumer debt advocacy expertise, making us one of the few legal services organizations with this expertise in the realm of family/matrimonial law in New York City. We advise clients on how to obtain, review, and request security freezes on credit reports; how to report fraudulent activity to the FTC and other appropriate agencies and to write dispute letters to the reporting agencies, and advocacy letters to creditors; and to remove abusers as authorized users on accounts. As a complement to our work with individual clients, Her Justice has advocated for an expansive legal definition of domestic violence and protections against enforcement of money judgments and debt collection in the fragile financial time following the pandemic. It is a cruel irony that, during the COVID-19 pandemic, debt collection cases moved forward as before, while the financial support that could be available in Family Court was endlessly delayed. Her Justice is committed to advocating for full recognition of the economic realities of domestic violence under the law and functioning courts to redress these issues expeditiously for survivors.



Access to Legal Services for Undocumented Immigrants Depends on Strong Community Partnerships

Her Justice takes a broad view of the needs of undocumented immigrants. While our focus is on critical legal services for undocumented immigrants and reform of legal systems, we know that access to and participation in legal processes is dependent on their overall stability. Stability, in turn, is dependent on undocumented immigrants' range of needs being adequately addressed by social services and other providers. Undocumented immigrants need financial stability, mental and physical health care, safe and adequate housing, and food security. These issues can overwhelm our clients, and without outside support and guidance can cause them to miss legal appointments or meetings with lawyers and ultimately disengage from their legal cases. With access to critical social services that address these non-legal needs, undocumented immigrants can fully participate in their legal cases. Recognizing this, Her Justice has established strong partnerships with community-based organizations. Through those partnerships, Her Justice provides reliable information, legal resources, and mutual referrals to high-need populations. Our partnerships strengthened during and following the pandemic, as organizations serving survivors of gender-based and domestic violence and undocumented immigrants have become even more reliant on one another to meet the complex and urgent needs of our clients. We urge the City and the Council to center the full range of immigration service providers and ensure strong support for nonprofit organizations meeting the needs of vulnerable New Yorkers.

As New Yorkers, we are committed to lifting our community up. When women are lifted, their children and communities rise with them. **We thank the Council for the support for the essential legal services that we provide to undocumented immigrant women living in poverty in New York City and partnership on policy reform to benefit all New Yorkers.** We look forward to continuing to work together.

Respectfully,

Susanna Saul, Esq.
Director of Immigration Practice, Her Justice
ssaul@herjustice.org



TESTIMONY

New York City Council Committee on Immigration
Oversight Hearing on Immigration Legal Services

Delivered by:

Sierra Kraft, Executive Director, ICARE Coalition
October 18th, 2023

Good afternoon, it's a pleasure to be here today. I want to express my gratitude to Chairperson Hanif and the Committee on Immigration for extending this opportunity for testimony. My name is Sierra Kraft, and I serve as the Executive Director at Immigrant Children Advocates' Relief Effort (ICARE). ICARE is a non-profit coalition of legal services organizations committed to providing vital and free representation to immigrant children facing deportation in New York City. Our ultimate goal is to ensure universal access to counsel, ensuring that every immigrant child in need has access to a high-quality legal representation.

Since 2014, with the support of City Council through the Unaccompanied Minors and Families Initiative, we have stood with over 11,000 courageous and resilient young immigrants from across the globe. We've defended them from deportation, empowering them to become leaders of tomorrow. Legal



representation has been truly lifechanging in the lives of many young New Yorkers.

Access to an immigration attorney can make the difference between life and death for immigrant children and families. Many of the children we represent are fleeing extreme violence and trauma in their home countries, undertaking a perilous journey to the U.S. in search of protection, safety, and new opportunities. Without ICARE's representation, most of these children would be forced to represent themselves against a trained government lawyer. Studies show that children without representation stand only a 15% chance of winning their case, even when they have a viable form of relief. The loss of access to attorneys can result in the rapid deportation of children and families to countries where their lives are at risk. For these children, losing their lawyers can mean losing their lives.

Children and families are more vulnerable now than ever – as NYC continues to welcome those seeking refuge, the need for legal services skyrockets. In FY2022 alone, Customs and Border Protections arrested over 150,000 unaccompanied minors at the border. New York continues to rank 4th in the country for highest number of unaccompanied arrivals released to sponsors. Every year, nearly 2,000 young New Yorkers are placed in removal



proceedings facing the possibility of deportation without due process if they cannot afford a lawyer. These children are our friends, neighbors, and our future.

ICARE attorneys are on the front lines every day protecting immigrants' rights and defending New York values. ICARE seeks to ensure that quality legal services are offered to *all* children, not only those who are able to afford them. Children represented by ICARE attorneys have more than a 90% success rate. With our support, these young New Yorkers can be given the opportunity to obtain higher education, pursue meaningful careers and step into leadership roles in a city they now call home.

Today, we renew our call for the City to make long-term investments in critical legal support by increasing funding for targeted communities, particularly the many unaccompanied minors in New York City who rely on the essential legal services and immigration supports that the ICARE Coalition provides. Funding for coalitions like ours is never guaranteed, but the need for our services has never been greater. This investment should take the form of multi-year funding and should support the passage of robust bills like the Access to Representation Act, ensuring every child can receive the necessary support and guidance.



In addition to the funding allocated for recently arrived asylum seekers, we call on City Council to increase funding for UMFI so we can expand our capacity to serve over 2,000 children and families through legal screenings, know-your-rights trainings, direct representation and referrals to city and social services. No child should have to face immigration court alone. Now more than ever, it is critical that NYC Council stand in solidarity with children seeking safety, protection, and a new life in this city.

Once again, thank you again for your tireless efforts to support all New York City's residents, and especially for continuing to champion children and providing lifesaving support so they can thrive and have a bright future. We could not have met the needs of our clients in this time without you. We look forward to our continued partnership with you in ensuring we live our values as a sanctuary city.

In Community,

Sierra Kraft

Executive Director,

ICARE Coalition

Email: skraft@icarecoalition.org

Phone: 701-866-3922

NYC Council Committee on Immigration
I-ARC Testimony on Legal Services for Asylum Seekers in NYC
October 18, 2023

Good morning, members of the New York City Council. My name is Lora Adams and I am the Legal Services and Capacity Building Coordinator at Immigrant ARC ("I-ARC").

Immigrant ARC is a coalition of over 80 member organizations that provide legal services across the state of New York. Our mission is to increase access to justice and access to legal counsel for immigrant New Yorkers by mobilizing New York's legal service providers and addressing the systemic barriers to justice that immigrants face.

I am here to discuss how legal service providers are responding to this surge in asylum seekers arriving in New York City. While the influx of migrants seeking refuge in New York City continues to be a challenge of capacity, legal service providers across the five boroughs have attempted to rise to the challenge and have made herculean efforts to come together to provide rapid response services. Providers here today will discuss in more detail the various programs they have set up through private funding or grants from the Mayor's Office of Immigrant Affairs, such as the Pro Se Plus Coalition and the ASLAN project. I will therefore limit my testimony to efforts that have not engaged providers directly. While legal service providers are doing everything they can to provide services to the roughly 113,000 migrants arriving in the city over the last year, they have faced significant challenges coordinating with the city, particularly the Mayor's Office. There has been little effort by the City to sit down with stakeholders, the legal service providers and community-based organizations who are the front-line responders in this crisis, to collaborate on these rapid response efforts and ensure a coordinated and strategic response. There has been no transparency regarding the creation of the Office of Asylum Seeker Operations, and providers have not been included in conversations about how to best respond to the needs of various communities despite their years of expertise. It is our observation that Black immigration communities—particularly from African countries—have suffered the most from lack of access to culturally competent services.

We are seeing many small, temporary rapid-response clinics from both the City as well as from legal service providers across the city. For example, the City launched the NYC Asylum Application Help Center in response to the crises. Like many of these clinics, the Asylum Center has been an immediate resource in providing necessary assistance to migrants in navigating the immigration process—ensuring that they apply for asylum on time, receive their work authorization, and are able to support themselves and their families as quickly as possible. These clinics meet an important need, but they have excluded the participation or input of long-time legal services and community based organizations, furthering a divide between the Mayor's office and the non-profit sector and failing to address the long-term needs of those they serve. A sustainable and meaningful response to the needs of new arrivals in New York City will invariably require coordination between city, state, legal providers and community based

organizations.

First and foremost, efforts run by the Office of Asylum Seeker Operations do not provide migrants with long-term representation, which can be a huge issue since a majority of asylum applications require follow-up or additional documents. Additionally, because a vast majority of these new arrivals are staying in shelters they are likely to change addresses as they find more permanent housing, which can cause delays in their paperwork or can lead to having their applications rejected when the U.S. Citizenship and Immigration Service notices are sent to old addresses. Without long-term legal representation and wrap-around services, much of the rapid response efforts will be undone as migrants fall through the cracks in the immigration process. It is Immigrant ARC's recommendation that what is needed is greater transparency from city agencies, strategic coordination from city and state governments with legal service providers and community based organizations, and funding for long-term immigration legal services, which includes the passing of the Access to Representation Act (A170A/S999A) at the state level.

We know that the best way to make an impact is by fostering collaboration and leveraging our respective areas of expertise across the board. As part of Immigrant ARC, and in partnership with several members and stakeholders, I personally helped organize and oversee an Employment Authorization Documents (EADs) clinic, which coordinated with the city, state, and federal government as well as legal service providers to obtain employment authorization documents for newly arrived migrants currently living in the city shelter system. I am proud to say that this clinic, the first of its kind, was able to screen 2,000 people and submit over 1,700 applications. There is interest across the state as well as in other parts of the country to have these efforts replicated and scaled up.

While the Mayor has chosen to frame the current state of affairs as a humanitarian crisis, we believe it should be viewed as an opportunity. NYC has always been a home to immigrants, it is our city's greatest strength and resource and if we ensure that these new arrivals get the long-term services they need to flourish, our city will grow and flourish with them.

Thank you for your work on behalf of immigrant communities, for calling this hearing, and for the opportunity to testify today.



**WRITTEN TESTIMONY BEFORE NEW YORK CITY COUNCIL'S
COMMITTEE OF IMMIGRATION
Submitted on October 21, 2023**

My name is Deborah Lee, and I am the Attorney-in-Charge of the Immigration Law Unit at The Legal Aid Society (“Legal Aid”).

Legal Aid is built on one simple but powerful belief: that no New Yorker should be denied the right to equal justice. We seek to be a beacon of hope for New Yorkers who feel neglected, regardless of who they are, where they come from, or how they identify. From our start over 145 years ago, our growth has mirrored that of the city we serve. Today, we are proud to be one of the largest and most influential social justice law firms in New York City and nation-wide. Our staff deliver justice in every borough, working tirelessly to defend our clients and dismantle the hidden, systemic barriers that can prevent them from thriving. As passionate advocates for individuals and families, LAS is an indispensable component of the legal, social, and economic fabric of our City.

Legal Aid handles nearly 300,000 cases annually through our Civil, Criminal, and Juvenile Rights Practices. Our work across these Practices together provides us with unique insights into the challenges facing marginalized communities in NYC and an unparalleled ability to effect change on a greater scale. The Civil Practice works with low-income New Yorkers experiencing a broad range of civil legal issues that, without assistance, can escalate into situations with cascading effects that threaten their stability and keep families locked in cycles of poverty. Our specialized units cover the full spectrum of civil legal needs, including housing and homelessness; homeowner stabilization, family law and domestic violence; immigration; special education; health; community development; consumer issues; employment; government benefits and disability; taxes; and holistic services for vulnerable populations including the elderly, adults and children with disabilities, and people living with HIV/AIDS.

Legal Aid welcomes the opportunity to provide testimony to the Committee on Immigration’s oversight hearing on “Legal Services for Asylum Seekers in New York City.”

The politicization of these vulnerable migrants, including on-going xenophobic rhetoric by the Administration, not only dehumanizes them but is utterly unproductive. No one is served well if asylum seekers in New York City do not achieve stability and self-sufficiency. This means thinking creatively and smartly about ways to help these newest New Yorkers obtain temporary work permits but also longer-term immigration status.

From September 25th to October 6th, the City, State, and federal governments partnered together with immigration advocates and community groups for a 2-week expedited work permit clinic for those in NYC shelters. 1,728 work permit applications were filed, primarily for those granted humanitarian parole. USCIS provided initial processing of these applications and

promised to provide approved work permit cards in hands within weeks. Legal Aid is proud to have provided training and support to this unique work permit effort.

Additionally, Legal Aid is monitoring the progress for our clients in actually obtaining these work permit cards in hand. We will keep the City Council updated regarding any issues that arise, especially as the Administration continues to force asylum seekers from its shelters. As the City Council is aware, the Administration is forcing single individuals to leave shelter within 30 days and families with children within 60 days.

We urge City, State, and federal governments to think and act constructively.

We encourage all levels of government to adopt an expedited processing model for Venezuelan Temporary Protected Status (TPS), which was extended and re-designated this past month.

USCIS is notoriously slow to process work permits for those with pending TPS applications and there is currently class action litigation regarding this.¹ We must all work together to avoid having Venezuelan TPS applicants in New York City shelters fall into this same situation.

Legal Aid also encourages the Administration to not solely invest in light-touch, high volume immigration legal services. Responsibly providing immigration legal services means having immigration legal providers in control of creating and implementing legal services.

The Administration should provide dedicated funding help existing providers build up their own pro bono supervision and community outreach. This is the smartest way to encourage more immigration legal representation for asylum, TPS, and any other legal options available to recent arrivals.

Legal Aid is proud that New York City is a sanctuary city. We are committed to fighting to advance immigrants' rights and welcome any opportunity to work with stakeholders to support and uplift our newest New Yorkers.

We thank the committee for its dedication to these issues.

Sincerely yours,



Deborah Lee
Attorney-in-Charge, Immigration Law Unit
The Legal Aid Society
dslee@legal-aid.org

¹ <https://immigrationlitigation.org/wp-content/uploads/2023/03/TPS-EAD-Complaint.pdf>



**Project Hajra
PO Box 350884
14721 Archer Ave.
Jamaica, NY. 11435**

Holistic Responses to Interpersonal Violence

October 21, 2023

Dear Honorable Councilwoman Shahana Hanif and the rest of the Immigration Committee,

Project Hajra submits this testimony related to the hearing held on Oversight: Legal Services for Asylum Seekers held on October 18th.

Project Hajra is a peer supported, gender justice collective working in our local Arab, Middle Eastern, Muslim, and South/Central Asian communities in Queens, NYC.

At the request of membership, we have begun to work with Afghan asylum seekers who have come to NYC through the southern border in partnership groups such as Afghans for a Better Tomorrow.

Project Hajra along with a broad coalition seeks the following for Afghan asylum seekers, and in total all asylum seekers in NYC:

- Expand and develop robust and comprehensive legal supports for asylum seekers
- Process work permits quickly and with emergency speed so families and adults can move out of shelter
- Robust interpretation and translation into languages such as Dari, Farsi, Pashto and other languages our asylum seekers speak



**Project Hajra
PO Box 350884
14721 Archer Ave.
Jamaica, NY. 11435**

Holistic Responses to Interpersonal Violence

- Invest in groups such as Project Hajra and Afghans for a Better Tomorrow as they are on the ground doing the work with asylum seekers.
- Allow asylum seekers to access FHEPS and CityFHEPS vouchers

This is only a crisis that puts communities against each other in Adams' imagination. There is enough space in the city for all and enough funds for robust and comprehensive legal support for all asylum seekers.

With Respect,

Project Hajra



PO Box 1406
Wall Street Station
New York, NY 10268-1406
Tel. 212.349.6009 Fax 212.349.6810
www.sanctuaryforfamilies.org

**Testimony of Pooja Asnani, Director of the Immigration Intervention Project
before The New York City Council
Committee on Immigration
October 18, 2023**

Good morning, Chair Hanif, and members of the Committee on Immigration. My name is Pooja Asnani, and I am the Director of the Immigration Intervention Project at Sanctuary for Families, New York City's largest provider of wrap-around services for survivors of domestic violence, human trafficking, sexual assault, and related forms of gender-based violence. We are so grateful for the opportunity to testify today on this critical subject, as our city urgently seeks to address the enormous numbers of asylum seekers who have arrived in recent months.

Sanctuary's Immigration Intervention Project is the nation's largest nonprofit immigration legal program for abuse survivors and their children: the program provides legal representation and advice to 2,000 immigrants annually, last year including over 270 abuse survivors assisted with gender-based asylum claims. Very few service providers have the legal expertise, experience in trauma-informed interviewing, and linguistic and cultural competence necessary to effectively assist these survivors in gender-based asylum applications. For those fleeing gender violence, the availability of high-quality legal assistance can literally be a matter of life or death.

While we do not have firm numbers, we know from conversations with officials running the City's Asylum Application Help Centers that there are hundreds of migrants arriving who may be eligible for gender-based asylum. These migrants have traveled from countries around the world—especially Venezuela, Ecuador, Guatemala, El Salvador, and Honduras—uprooted from their homes due to domestic violence and rape, as well as the failure of law enforcement to protect vulnerable people, especially women and children, from violence. Their journeys to safety usually involved arduous, life-threatening treks, often with minor children, and many experienced sexual violence en route. Even after arriving in New York, they remain extremely vulnerable to abuse, trafficking and other exploitation.

With the influx of tens of thousands of migrants in NYC, Sanctuary has worked to obtain additional funding from the State Office of New Americans as well as private sources, allowing us to expand our asylum legal staff significantly to address the immense need. Numerous major law firms have already signed on to work with us on these cases, and we are actively recruiting additional firms. This will allow us to provide legal aid to a significantly higher volume of asylum seekers than ever before over the next three years.

On the ground, Sanctuary will assist scores of individuals and families in preparing accurate, compelling asylum (I-589) applications—the critical first step that asylum seekers must take within a year of their arrival in the United States. The goal is to ensure that these initial applications are done correctly, without errors or misrepresentations that could result in rejection of the filing and the catastrophic consequence of removal from the US. After the initial filings, Sanctuary and its law firm partners will do our best to assist clients with other key asylum application components: the affidavit, country conditions report, and preparation needed to testify when the hearing date comes up. But even with new staff and extensive pro bono support, there are capacity limits in our ability to provide full legal representation to the scores who will need it.

At this point, we are just getting started with our expanded asylum initiative: in the past six months alone, we received over 500 referrals from community partners and city agencies. Among these, we are taking on the most urgent and challenging cases, and we encourage the Council to look at Sanctuary as a resource for abuse survivors in your community, particularly those who may have gender-based asylum claims. We will do our best to provide the high-quality legal services they need and deserve and, wherever capacity permits, access to Sanctuary's range of other services including trauma counseling for adults and children, case management, career training, and other economic mobility services. We encourage the Council to expand City funding for these much-needed services, and are grateful that the General Welfare Committee has called another hearing next week to discuss the broader scope of asylum seeker response efforts.

We applaud the efforts of the Immigration Committee to ensure that New York's new arrivals get the help they need to gain asylum legal status. Thank you for the opportunity to testify today, and for your unwavering commitment to the immigrants that are the heartbeat of our great city.

October 18, 2023

The Honorable Shahana Hanif
Chair, Committee on Immigration
250 Broadway
New York, NY 10007
hanif@council.nyc.gov

**Testimony of the Vera Institute of Justice Regarding
“Oversight - Legal Services for Asylum Seekers in New York City”
Submitted to the Committee on Immigration of the New York City Council**

Dear Chairperson Hanif,

On behalf of the Vera Institute of Justice, I write to offer information and recommendations regarding New York City’s imperative to not only address the urgent needs of newly arriving asylum seekers, but also to implement long-term solutions that will establish infrastructure to sustainably support both newly arrived immigrants and long-term residents, both of whom are essential parts of New York’s communities, families, and economy. While this is indeed a moment to demand urgent solutions, it also presents an opportunity to consider the long-term solutions that will prepare New York City to welcome immigrants for years to come. By ensuring access to legal help for all immigrants in New York at risk of deportation, we can meet both the urgent and longer term needs of immigrant New Yorkers and we can continue our legacy of investing in immigrant communities and leading the way for the rest of the country.

Vera works to end mass incarceration, protect immigrants’ rights, ensure dignity for people behind bars, and build safe, thriving communities. One of our core priorities is to advance universal representation to ensure that no immigrant is forced to face the prospect of detention and deportation without a trained legal advocate. Ensuring access to legal counsel for all immigrants not only promotes fairness and dignity, but is also a common sense investment in New York City’s economy and stability.

Over the last year, governors of southern states have cruelly used people seeking safety as political pawns. Despite attempts at divisive rhetoric and fearmongering, a recent Siena Poll shows that 84 percent of New Yorkers agree that most of the current migrants to the United States are simply looking to create a better life for themselves and their loved ones.¹

There are important opportunities to respond in this moment. The increased numbers of newly arriving immigrants here has highlighted existing, longstanding gaps in the city and the state’s legal services infrastructure that must be addressed with both long-term solutions and investments in legal services that meet urgent needs. We urge the city to pass Resolution 556, introduced by Councilmember Crystal Hudson last session in support of the Access to Representation Act (ARA).² As the ARA also calls for, a crucial measure is investing in a training pipeline for high quality legal teams that can support both newly arriving and longtime residents of New York. New York must pass state legislation that would limit the number of

people subjected to the prospect of detention and deportation in the first place. By implementing these forward-looking solutions alongside efforts to meet immediate legal needs, New York can rise to meet the needs of the moment and also build a stable foundation to ensure that we are on stronger footing in the future.

Immigrant New Yorkers are in urgent need of legal services.

Our recently arrived neighbors need assistance with applying for asylum and Temporary Protected Status, navigating immigration court proceedings, and obtaining work permits. Long-term residents facing deportation also need continued support to stay in their communities, including assistance applying for immigration relief, appealing unfair decisions, and accessing social work support.

Hundreds of thousands of New Yorkers are currently ensnared in the United States' detention and deportation machinery. An enormous, growing immigration court backlog causes long delays for people trying to defend their rights, win immigration relief, and obtain work authorization. Nearly half of immigrants facing deportation across the state are navigating these highly complex and slow-moving systems alone: as of August 2023, more than 125,000 of approximately 262,000 pending cases in New York immigration courts are unrepresented.³ In the face of a broken federal immigration system, state and local jurisdictions can demonstrate the benefits of policies that support immigrant communities, promoting family unity and economic stability.

Immigrants are an essential part of New York's social fabric and economic future.

Ensuring access to immigration legal services will undoubtedly make New York stronger. Immigration is an inextricable part of New York's history, identity, and culture, and it is also essential to New York's growth and stability in the future. The state faces potentially detrimental consequences from a diminishing immigrant population. New York's immigrant population has effectively plateaued in the past decade.⁴ Between 2020 and 2022, New York City lost more than 400,000 residents.⁵ Currently, there is a labor shortage across the state, with more than half a million vacant jobs as of August—more than the number of workers available to fill them.⁶ Immigrants comprise more than one quarter of the state's workforce and participate in the labor force at higher rates than U.S.-born New Yorkers.⁷ Investing in legal services in the long term will ensure the interlinked wellbeing of New York and its immigrant communities.

New York must invest in immigration legal services to continue its track record of welcoming immigrants and protecting their rights.

New York has been a trailblazer in investing in immigrant communities and has long recognized the critical need and beneficial outcomes of ensuring that immigrants have access to universal representation. In 2013, the city launched the New York Immigrant Family Unity Project (NYIFUP), the first pilot program in the country to provide publicly funded deportation defense to detained immigrants under a universal representation model (meaning that the only criteria to receive representation was inability to pay for a private attorney).⁸ NYIFUP expanded statewide in 2017 and is now replicated in more than 50 jurisdictions across the nation.⁹ Measures like NYIFUP are popular: a 2020 poll found that 93 percent of New Yorkers support government

funded lawyers for people in immigration court (including 99 percent of people in New York City).¹⁰

Solutions that establish access to counsel are also very effective: Having representation gives immigrants a fighting chance in an incredibly complex system with stakes as high as permanent family separation and deportation to another country where their lives may be in danger. Among all people in deportation proceedings, only 9 percent without representation in the past twenty years have won relief from deportation, whereas 62 percent of those with representation won relief from deportation.¹¹ People in detention with legal representation are up to 10.5 times more likely to have a successful case outcome than those who are unrepresented.¹² For non-detained people, 60 percent with lawyers win their cases compared to 17 percent of those without a lawyer.¹³ Our immigration system is nearly impossible to navigate without counsel, and legal assistance should not depend on the ability to afford it.

New York City’s support of immigrants needs to focus on both long-term and short-term solutions:

- *New York needs long-term legal services infrastructure.*

New York City must call for the passage of the **Access to Representation Act (ARA)**, state legislation that would establish a right to counsel for people in New York with cases in immigration court and at risk of deportation. The ARA is designed to implement this right to counsel over a responsible six-year process of expanding legal services so that service providers can build up their teams at a sensible and sustainable pace. Ultimately, the ARA will ensure that anyone at risk of deportation in New York—whether newly arrived or with longstanding roots here—has a fighting chance to defend their rights and to remain with their family, at their job, and in their community.

A key part of the ARA’s expansion of legal services is building a pipeline that will help staff up immigration legal services teams with skilled advocates and build the capacity of providers to meet the needs of immigrant New Yorkers, which may fluctuate with changes in the immigration policy landscape or migration patterns. Investing in law school clinics, fellowships, and training programs will help to build this pipeline to staff up teams of experts, including lawyers, Department of Justice accredited representatives, social workers, and support staff. A solid and sustainable framework for providing legal services includes competitive salaries for recruitment and retention of skilled legal team members, reasonable caseloads to ensure high-quality services, and integrating social work into legal teams to support clients dealing with trauma that is often a central part of their legal case. Finally, as the ARA also calls for, this expansion of legal services infrastructure must be built in alignment with the recommendations of legal teams delivering services on the ground.

- *New York also needs long-term solutions to not just manage, but also avoid the dangers of detention and deportation.*

A key long-term solution is also ensuring that fewer people are subjected to the danger of deportation and detention in the first place. We commend the city for passing resolutions calling upon New York State to pass two pieces of pending legislation that would help shrink the system targeting immigrants.¹⁴ **The Dignity Not Detention Act** would end state contracts with Immigration and Customs Enforcement to detain people in the state. **The New York for All Act** would stop state and local resources from being used for federal immigration enforcement agendas. Passing both proposed pieces of legislation will be an important step to mitigating the overall harm caused by immigration enforcement in New York and lessening the overall need for deportation defense legal services.

New York City should also protect its undocumented residents who are neither recently arrived asylum seekers nor facing deportation proceedings by funding legal services that will help them obtain immigration relief and thus avoid targeting by immigration enforcement.

- *As those long-term solutions are being implemented, New York City and New York State must continue expanding services for newly arriving immigrants in a way that ensures equal access to high-quality assistance for urgent legal needs.*

Many newly arriving immigrants have opportunities to seek relief including asylum and Temporary Protected Status, and to obtain work authorization as part of that relief. Building a successful asylum case can require complex legal knowledge, expert testimony and evaluations, evidence gathering, and extensive research on country conditions. Asylum seekers need full representation on these matters to build strong cases quickly—the deadline for immigrants to file for asylum is within one year of arriving in the United States—but this can be difficult when demand for services is high and legal service providers are already overburdened.

New York City and New York State must meet the need for rapid response on these time-sensitive needs, while also ensuring that teams delivering assistance have the necessary expertise and support to provide high quality legal services. Experienced immigration attorneys can oversee pro bono attorneys, law students, and trained volunteers to help ensure that recently arrived asylum seekers have information critical to their immigration cases, thorough legal orientations, and know-your-rights trainings. When full representation is not possible because of insufficient available legal service providers, as a stop gap measure, attorneys and accredited representatives can offer limited scope assistance with key parts of immigration cases and filings, or pro se assistance to guide individuals representing themselves in immigration court. The city and state must ensure such services and resources are available to all, regardless of factors other than need.

New York once again has the opportunity to set an example for the rest of the country in implementing successful universal representation programs, support and strengthen its immigrant

communities, and ensure the wellbeing of all its residents going forward. With the solutions outlined here, the city will ensure that we can sustainably and humanely respond to immigrants' legal services needs in this challenging moment as well as build a foundation to support immigrants into the future.

Thank you for the opportunity to contribute my testimony. Please do not hesitate to contact me at rwang@vera.org or at (646) 983-1471 if the Vera Institute of Justice may provide further information or support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rosie Wang', written in a cursive style.

Rosie Wang
Program Manager
Vera Institute of Justice

-
- ¹ Siena College Research Institute, “Majorities Support: Using Federal Properties to Shelter Migrants, Easier Work Authorizations & Comprehensive Immigration Reform; Oppose Border Wall 50-41%,” September 12, 2023, <https://scri.siena.edu/2023/09/12/majorities-support-using-federal-properties-to-shelter-migrants-easier-work-authorizations-comprehensive-immigration-reform-oppose-border-wall-50-41>.
- ² The New York City Council “Res 0556-2023,” database (New York: The New York City Council, updated April 28, 2023), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6165403&GUID=1A030401-F313-4021-BC4A-BC26135E5D1A&Options=ID%7CText%7C&Search=556>
- ³ Transactional Records Access Clearinghouse (TRAC), “New Deportation Proceedings Filed in Immigration Court,” accessed October 17, 2023, trac.syr.edu/phptools/immigration/ntanew. Out of 261,983 total pending removal proceedings at New York State immigration courts, 125,746 do not have legal representation. To find this statistic, set the first column to “Immigration Court State” and select “New York,” set the second to “Outcome” and select “Pending,” and set the third column as “Represented.” This information is refreshed monthly and may change as new data is added.
- ⁴ FWD.us, “New York needs pro-immigrant policies to bolster its population and economy,” February 17, 2023, <https://www.fwd.us/news/new-york-economy>.
- ⁵ U.S. Census Bureau, “City and Town Population Totals: 2020-2022,” accessed September 7, 2023, <https://www.census.gov/data/tables/time-series/demo/popest/2020s-total-cities-and-towns.html>.
- ⁶ U.S. Bureau of Labor Statistics, “Job Openings and Labor Turnover Survey,” accessed October 17, 2023, <https://www.bls.gov/jlt>.
- ⁷ Steven Ruggles, Sarah Flood, Matthew Sobek, et al., “IPUMS USA: Version 13.0,” dataset, IPUMS, 2023. <https://doi.org/10.18128/D010.V13.0>. Figures are calculated using the 5-year 2022 American Community Survey dataset.
- ⁸ Jennifer Stave, Peter Markowitz, Karen Berberich, et al., *Evaluation of the New York Immigrant Family Unity Project: Assessing the Impact of Legal Representation on Family and Community Unity* (New York: Vera Institute of Justice, 2017), <https://www.vera.org/publications/new-york-immigrant-family-unity-project-evaluation>.
- ⁹ Vera Institute of Justice, “Advancing Universal Representation Initiative,” database, updated July 2023, <https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative>.
- ¹⁰ Vera Institute of Justice, *Public Support in New York State for Government-Funded Attorneys in Immigration Court* (New York: Vera, 2020), <https://www.vera.org/downloads/publications/taking-the-pulse-new-york.pdf>.
- ¹¹ TRAC, “New Deportation Proceedings Filed in Immigration Court,” accessed October 17, 2023, trac.syr.edu/phptools/immigration/ntanew. Out of 4,315,195 unrepresented removal proceedings between October 2000 and August 2023, 36,109 cases resulted in legal relief. Out of 3,048,894 represented removal proceedings between October 2000 and August 2023, 523,944 cases resulted in legal relief. To find this statistic, set the first column to “Immigration Court State” and select “all,” set the second to “Outcome” and select “Grant Relief,” and set the third column as “Represented.” This information is refreshed monthly and may change as new data is added.
- ¹² Emily Ryo, “Detained: A Study of Immigration Bond Hearings,” *Law & Society Review* 50, no. 1 (2016), [jstor.org/stable/44122502](https://www.jstor.org/stable/44122502) (un-paywalled pre-publication version accessible at papers.ssrn.com/sol3/papers.cfm?abstract_id=2628962)
- ¹³ Ingrid V. Eagly and Steven Shafer, “A National Study of Access to Counsel in Immigration Court,” *University of Pennsylvania Law Review* 164, no. 1 (2015), 9, perma.cc/82F5-WE2D.
- ¹⁴ The New York City Council “Res 0112-2022,” database (New York: The New York City Council, updated April 28, 2022), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5552135&GUID=03072CF0-E7E8-4591-9C90-4CD02B538D3A&Options=&Search=>; The New York City Council “Res 0066-2022,” database (New York: The New York City Council, updated March 10, 2022), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5465338&GUID=11F26BAE-B1C4-4B5F-833D-FD8A06DF0152&Options=ID|Text|&Search=%22dignity+not+detention%22>.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/15/23

(PLEASE PRINT)

Name: Tom Tortorici

Address: Executive Director for Legal Support

I represent: MOIA Initiatives

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/23

(PLEASE PRINT)

Name: Commissioner Manuel Castro

Address: _____

I represent: MOIA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/23

(PLEASE PRINT)

Name: Masha Gindler

Address: _____

I represent: Executive Director for Asylum Application Help

Address: Center

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/23

(PLEASE PRINT)

Name: ROSIE WANG

Address: 35TH AVE, JACKSON HEIGHTS, NY

I represent: VERA INSTITUTE OF JUSTICE

Address: 34 35TH ST, BROOKLYN, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/2023

(PLEASE PRINT)

Name: Melissa Chua

Address: New York Legal Assistance Group (NYLAG)

I represent: NYLAG

Address: 100 Pearl Street 19th Fl NY NY 10004

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/19/2023

(PLEASE PRINT)

Name: Lora Adams

Address: _____

I represent: Immigrant - ARC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 10/18/23

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: Burgh Ave

I represent: Self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: POOJA ASHANI

Address: _____

I represent: SANCTUARY FOR FAMILIES

Address: PO BOX 1406, WALL STREET STA, NY NY 10268

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Kelly Agnew-Barajas

Address: 80 Maiden Lane

I represent: Catholic Charities - Dir of Refugee

Address: Resettlement

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Keighly Reclor

Address: 686 W End Ave 11C, New York, NY 10025

I represent: NY ALA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10-18-2023

(PLEASE PRINT)

Name: SUSANNA SAUL

Address: _____

I represent: Her Justice

Address: 100 Broadway NYC

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/2023

(PLEASE PRINT)

Name: Pooya Abooni

Address: Sanctuary for Families

I represent: 30 Wall Street, New York NY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/23

(PLEASE PRINT)

Name: BASTIAN HARTIG

Address: 1700 GRAND CONCOURSE 6C

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/18/2023

(PLEASE PRINT)

Name: Raul Rivero

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms