



**Department of
Youth & Community
Development**

TESTIMONY

BEFORE THE NEW YORK CITY COUNCIL

COMMITTEES ON YOUTH SERVICES AND IMMIGRATION

Oversight - LGBTQ Immigrant Youth in New York City.

Int 480 - In relation to requiring the department of youth and community development to review strategies and create a plan of action to protect children who qualify for special immigrant juvenile status.

PRESENTED BY

Assistant Commissioner Randy Scott

September 17, 2018

Good morning, Chair Rose and Chair Menchaca and members of the Committees on Youth Services and Immigration. I am Randy Scott, Assistant Commissioner for Vulnerable and Special Needs Youth at the New York City Department of Youth and Community Development, and I am joined by Kathleen Almanzar, Senior Director of DYCD's Literacy and Immigrant Services. Thank you for inviting DYCD to testify today.

Int. No. 480 requires DYCD to submit a comprehensive plan to provide services to Runaway and Homeless Youth program participants who may be deemed eligible for Special Immigrant Juvenile Status or other immigration benefits, and to report annually on our progress toward that goal.

Special Immigrant Juvenile Status is a classification available to undocumented immigrants under the age of 21 who have been abused, neglected, or abandoned by one or both parents and are dependent on the Family Court. Obtaining this status allows an immigrant youth to obtain permanent legal residency and provides a path to citizenship.

DYCD is strongly in favor of connecting participants to the appropriate supports. As part of the contract to provide Runaway and Homeless Youth Services, providers are funded to assist young people to meet their needs in all basic areas – education, careers, health and mental health, and including basic life needs, such as acquiring identification and including helping them navigate their rights.

DYCD-funded RHY programs currently refer participants to organizations, including RHY contractors, such as The Door, Rising Ground Legal Services, Covenant House Legal Services, Project Hospitality El Centro/Single Stop and other groups such as the Urban Justice Center and Legal Aid Society. Service providers are required to make appropriate referrals for legal services, including immigration legal services. Providers make case referrals to nonprofit legal services providers across the City or in some cases refer internally to their in-house legal services teams. DYCD's goal is to make sure participants are able to access immigration services and we support the intent of Int. No. 480. Through the Human Resources Administration, the City contracts with immigration legal services providers and we will explore additional ways to connect our participants with these providers as appropriate.

It appears that the process outlined in Int. No. 480 is modeled on the process used by the NYC Administration for Children's Services for children in foster care. There are important differences between ACS and DYCD that would affect implementation of the process outlined in Int. No. 480. For youth in the care and custody of ACS, the agency's access to important documents such as a youth's birth certificate and case history can help with identification and referral for immigration legal services. Additionally, an active Family Court proceeding is a prerequisite for SIJS relief, which applies to ACS-involved youth but not necessarily to DYCD's population. For both agencies, it can be challenging to obtain information about the outcome of a case because youth have the legal right to a confidential attorney-client relationship. Given the unique characteristics of DYCD's runaway and homeless youth population, we'd like to work with the Council on amending the bill. Our providers work to build trust with participants, who share sensitive information on a voluntary basis, and we do not want participants to worry that receiving services obligates them to disclose immigration status. We also do not want to expose the participants to any unnecessary risk that could result from maintaining records about immigration status, particularly since immigration status is not relevant to eligibility for DYCD funded RHY services.

I will now discuss the oversight topic, LGBTQ immigrant youth in New York City. DYCD supports New York City youth and their families by funding a wide range of high-quality youth and community development programs, including afterschool programs, community centers, literacy programs, and youth workforce development. We require that all of our programs are fully open and welcoming to both LGBTQ individuals.

This Administration has made unprecedented investments of over \$20 million to keep young people safe and sheltered. By 2019, we will have since 2014 tripled the number of beds available to runaway and homeless youth in this city. We are on target to have 753 beds open in FY 2019 for youth up to age 21, and we have released a request for proposals to serve young adults ages 21-24. New resources from the Unity Project have supported the expansion of the 24-hour drop-in centers, and we expect to have one 24-hour center open in each borough this fall.

DYCD is the administrative agency for the Interagency Coordinating Council on Youth (ICC), and the LGBTQ workgroup. I have been the Co-Chair of that workgroup since 2011. Through the ICC, DYCD has offered training with many partners for both agency staff and providers to increase their ability to work effectively and sensitively with the LGBTQ population. The work group meets monthly and consists of 15 members representing City agencies and the provider community.

Through ongoing efforts to strengthen our site monitoring practices and investment in capacity building services, DYCD staff and providers are focused on ensuring that LGBTQ youth, who are overrepresented in the RHY population, have positive and welcoming experiences in our programs. DYCD regularly evaluates programs to determine whether they are inclusive, welcoming, and respectful environments that embrace the diversity of all participants.

Serving immigrants is an integral part of the work of DYCD. We fund programs for immigrants that assist participants with accessing government benefits, application assistance (including assistance with matters relating to citizenship and immigration status), employment, healthcare, social services, and civics classes in preparation for citizenship. Our Comprehensive Services for Immigrant Families program helps identify the complex and multiple needs of newly-arrived immigrant families with limited English proficiency, and, in collaboration with a network of community-based providers, connects them to relevant services that will help them prosper and become self-sufficient. The goal is for each enrolled family to build self-advocacy skills and gain the knowledge to enable them to address specific challenges and navigate key systems that impact their lives such as the education, healthcare, housing, benefits, tax, workplace, and legal and immigration systems.

Beyond immigrant services programs, we are mindful that New York City is a city of immigrants, and work to ensure that all of our programs are accessible to immigrants and their families. Our funding model acknowledges that community-based organizations and their staff are best equipped to meet the cultural and language needs of a community. When applying for a contract with DYCD, all community-based providers must describe how they will work within the local communities and understand their specific cultural and linguistic needs. To support this, DYCD translates many of our outreach documents into eleven languages. Once a contract is underway, our evaluation criteria reflect these requirements. DYCD's contracts require meeting enrollment and attendance targets that cannot be achieved without engaging parents and young people in a linguistically and culturally competent manner.

Through our capacity building department, we offer technical assistance and trainings to our providers. Training topics have included supporting English language learners; sexual orientation and gender identity; and working with LGBTQ and gender non-conforming youth. The Hetrick-Martin Institute has a multi-year contract with DYCD to develop a self-assessment tool to help other youth-oriented community organizations to address the specialized needs of LGBTQ youth, particularly transgender youth, including providing inclusive and welcoming environments.

Our Youth Connect hotline is available to connect New Yorkers to our funded services, through 311 or 1-800-246-4646. Youth Connect specialists help callers learn more about DYCD-funded programs and find program sites in their neighborhood. When we identify callers that need interpretation assistance, we connect them to language bank operators, who have the ability to speak up to 180 different languages.

We have also targeted our outreach in advertising to immigrant communities. In FY18, DYCD placed ads in community newspapers promoting our funded services, including shelters for youth, and the Youth Connect hotline. The advertisements ran in Spanish, Arabic, Bengali, Urdu, Chinese, Haitian Creole, Polish and Russian. In July, we promoted our Youth Connect hotline and our funded services on the LinkNYC kiosks around the City.

The success of our programs is dependent on being able to reach the New Yorkers most in need of our services, and we are committed to reaching out to traditionally underserved communities. After you hear from my colleagues at the Mayor's Office of Immigrant Affairs and the Unity Project, I will be happy to answer any questions.

Testimony of the The Door – A Center of Alternatives,
Inc.

On

Intro. 480 – A Local Law to amend the
administrative code of the city of New York, in
relation to requiring the Department of Youth and
Community Development to review strategies and
create a plan of action to protect children who
qualify for special immigrant juvenile status

Presented before:

Committee on Youth Services
Committee on Immigration

Presented by:

Eve Stotland, Esq.
Director, Legal Services Center
The Door – A Center for Alternatives, Inc.

September 17, 2018

Dear Chairpersons Rose and Menchaca, and Members of the Committee on Youth Services and the Committee on Immigration:

Today I am providing testimony on behalf of The Door – A Center of Alternatives, Inc. and on behalf of our partner agency, The Peter Cicchino Youth Project (PCYP) of the Urban Justice Center. Both The Door and PCYP serve vulnerable immigrant youth, including youth who are homeless and youth who are lesbian, gay, bisexual, transgender or questioning (LGBTQ).

The Door has a long history of partnering with the city to meet the needs of undocumented and homeless youth. Last year, The Door served approximately 2,200 runaway and homeless youth. Of those, approximately 150 connected with a lawyer in our Legal Services Center, and 25 obtained full representation in pursuing special immigrant juvenile status. We are grateful for Council Member Dromm's efforts to ensure that NYC's homeless youth receive the services they need to obtain stability and success. Specifically, we look forward to working with City Council, the Department of Youth and Community Development (DYCD) and other relevant city agencies to increase access to immigration representation for homeless and LGBTQ youth.

We support the passage of Intro. No. 480, requiring the Department of Youth and Community Development to review strategies and create a plan of action to protect children who qualify for special immigrant juvenile status. However, we believe that the measure should be revised in response to recent developments in federal immigration policy. First, we suggest that the Council shift the focus of the bill from identifying youth who are eligible for special immigrant juvenile status to providing youth with comprehensive immigration screening. Second, we recommend that the bill instruct DYCD not only to identify and track outcomes for homeless youth who are undocumented, but to create a plan for promoting access to full legal representation for such youth. Finally, in this time of increased immigration enforcement, we ask that the city proceed with great caution to protect any information it may collect regarding undocumented and immigrant New Yorkers. Each of these issues is addressed in detail below.

Comprehensive Immigration Screening

Special Immigrant Juvenile Status (SIJS) is a path to lawful permanent residence (aka a greencard) for children under the age of twenty-one who have been abused, neglected or abandoned by one or both parents. Homeless youth are disproportionately survivors of childhood abuse or neglect. As a result, they are often eligible for SIJS. Nevertheless, homeless youth may also be eligible for other paths to obtaining lawful status, such as asylum, U Visas (for victims of crime), and T Visas (for survivors of human trafficking). The only way to know if a young person has a path to a greencard is to provide that young person with a comprehensive immigration screening conducted by an immigration attorney or properly trained paralegal or advocate. For this reason, we suggest that the bill's authors revise the bill to make clear that DYCD should create a process for assessing the eligibility of undocumented youth for any form of immigration relief, and not just for special immigrant juvenile status.

It is crucial that the bill promote youth access to all forms of immigration relief, and not just SIJS, because SIJS is under attack by the Trump Administration. Applying for SIJS requires a child to complete two proceedings. First, the child must petition the family court for an order making factual findings that the child is unmarried, under the age of 21, is dependent on the family court, and that reunification with one or both parents is not viable due to abuse, neglect or abandonment. Second, the child must file an application for SIJS and Adjustment of Status with the US Citizenship and Immigration Service (USCIS). Under New York law, family court judges have jurisdiction over children in child welfare and guardianship cases until the child turns 21. In a devastating turn of events, this past year, with no notice, the USCIS began to deny the SIJS applications of children who obtained the relevant family court orders when they were 18, 19 or 20.

The federal statute that governs SIJS clearly defines a child as a person under the age of 21; therefore, the government is violating that law in refusing to grant SIJS to children who are 18, 19 or 20 years old. In response, the Legal Aid Society and the law firm of Latham & Watkins LLP, have filed a class action lawsuit, *RFM v. Nielsen*, in the Federal District Court for the Southern District of New York. The suit disputes the Trump administration's determination that the state Family Court does not qualify as a juvenile court, and asserts that such an interpretation violates the law. In the meantime, the clients whose cases were denied by USCIS remain undocumented, unable to work lawfully or receive federal financial aid for college. Until the lawsuit is resolved or there is a change in the federal government's position, it is crucial that even youth who qualify for SIJS have an opportunity to explore other avenues for obtaining a greencard.

Access to Full Representation

Every undocumented young person served by the City's runaway and homeless youth program should be offered the opportunity to be screened for immigration relief. However, to obtain lawful status and protection from removal, youth need access to free legal representation. New York City pioneered funding lawyers for undocumented children, and has at least one contract, Legal Services for Immigrant Youth, which explicitly funds attorneys for undocumented youth, with a special emphasis on youth in foster care. That contract, which is part of the federal Community Service Block Grant program, is now managed by HRA instead of DYCD. We are tremendously grateful for this funding.

Nevertheless, the need for free immigration representation is so great that, even with this funding, The Door is often at capacity and unable to represent a significant number of youth who contact us seeking immigration representation. To make matters worse, the federal government continues to put up barriers that make it harder for us to win these cases. As each case requires more work than in the past, we have no choice but to serve fewer clients. We commend Mayor de Blasio on the recent expansion of funding for the representation of immigrants in removal proceedings. However, most the homeless, undocumented youth we encounter are not in removal proceedings, so they do not qualify for representation as part of the New York Immigrant Family Unity Project (NYIFUP) or Immigrant Children Advocates Relief Effort (ICARE) initiatives. We would welcome increased funding so to ensure that all homeless youth who are eligible to improve their immigration status have access to the legal representation required to obtain a greencard.

Confidentiality in the Face of Increased Immigration Enforcement

We are grateful that the city understands that it must closely guard information about undocumented youth in NYC. Given the increase in immigration enforcement under the Trump Administration, we look forward to working with the city to make sure that any data regarding undocumented youth is kept confidential, and that city officials adhere to Executive Orders 34 and 41, generally prohibiting city employees from disclosing immigration status information.

With these concerns in mind, we look forward to working with you to improve access to immigration screening and representation for homeless and LGBTQ youth in NYC.

Thank you for your unflagging efforts to protect vulnerable youth in NYC. And thank you for the opportunity to testify today.



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Testimony to the New York City Council

Committee on Youth Services, Committee on Immigration

September 17th, 2018

Good afternoon. My name is Jeffrey Colt and I am the Senior Supervising Attorney in the Legal Department at Covenant House New York, where we serve runaway and homeless youth, ages 16 to 24. I would like to thank the Committee on Youth Services and the Committee on Immigration, and in particular, their respective chairs Deborah Rose and Carlos Menchaca for the opportunity to testify today.

Covenant House New York (“CHNY”) is the nation’s largest, non-profit adolescent care agency serving homeless, runaway, and trafficked youth. During this past year, Covenant House New York served over 1,900 young people in our residential programs, as well as through our drop-in center and street outreach efforts. On a nightly basis, we provide shelter to approximately 200 young people, including pregnant women and mothers with their children, LGBTQ youth (who make up a disproportionate number of homeless youth), immigrant youth, and trafficking survivors. Our youth are primarily people of color and over a third of our youth have spent time in the foster care system. Many of our youth have experienced abuse or neglect at the hands of parents or other caregivers, and an exceedingly high percentage of our youth struggle with the pervasive impacts of trauma, mental health issues, and substance abuse. We provide young people with food, shelter, clothing, medical care, mental health and substance abuse services, legal services, high school equivalency classes and other educational programs, and job-training



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programs. All these services help young people overcome the trauma of abuse, homelessness, and exploitation and move toward stability and self-sufficiency.

Within the broader scope of CHNY exists our dedicated Legal Department. Our department is different from almost every other legal service provider in the state because we serve the legal needs of homeless young people in the same location as they live. We work with transient youth who need assistance in their moment of crisis in an environment they are familiar with. I currently serve as the sole attorney at CHNY providing our clients direct representation, advice, counsel, and referrals. Our department services all youth residing in our crisis shelter or transitional living program (TIL) and those accessing our street outreach services. We provide our direct legal services free of charge and extend help to former residents no longer staying with us at CHNY. Our Legal Department advocates for youth on an array of issues, including name changes (especially for transgender and gender nonconforming youth), immigration, custody and visitation, domestic violence, broken adoptions (when adoptive parents continue to collect an adoption subsidy despite having kicked youth out of their home), identity theft, public benefits, and virtually anything else that a homeless youth can experience.

Over the past few years, we have received an increase in calls from young people anxious and fearful of the current political climate and the rigid immigration policies being enforced throughout the United States. Many immigrants, including runaway and homeless youth, have been denied benefits, services, and opportunities that they would otherwise be entitled to. The homeless youth we serve already live in an immense state of uncertainty and vulnerability. Adding an additional layer of legal and immigration issues can throw them off-course from their



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path towards independence and security. Not only do we answer these increased calls, but, additionally, young people in our care are asked about their immigration status both by intake specialists and case management staff. First, they are assured that immigration status will in no way affect the services they receive at CHNY. If the young person lacks legal immigration status and does not already have an attorney, they are referred to our legal department.

During Fiscal Year 2018, 45 CHNY youth self-identified as having immigration-related issues. During that same period, our department had an intake of 15 immigration cases and 6 Special Immigrant Juvenile Status (SIJS) cases. Overall, we served 41 clients in immigration related cases; 27 in broader immigration issues and 14 in SIJS-specific cases.

SIJS is a critical form of immigration relief designed for the most vulnerable of immigrants to the United States –children and youth. *In the past*, federal immigration policy allowed a youth, under the age of 21, who had suffered abuse, neglect, abandonment or other qualifying physical or emotional harm from a parent to petition the United States Citizenship and Immigration Service (“USCIS”) for adjustment of status and create a pathway to lawful residency, which meant safety and stability. Sadly, a large majority of CHNY’s undocumented youth would meet the abuse, neglect, or abandonment requirement for a SIJS case. However, many of them do not have a willing guardian, which is a necessary component for a SIJS case.

If a youth chooses to pursue SIJS relief and can identify a guardian, our Legal Department would then draft and file the necessary paperwork in Family Court. This often resulted in a signed New York Family Court SIJS order. Then we would proceed to complete and submit the required USCIS forms, which put the youth on the road to stability.



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But that was the past. Over the last couple of years, USCIS has changed its policies and instead of granting immigrant youth the relief to which they were entitled, that government agency began to tighten its grip and soon our Legal Department, and indeed legal organizations around New York, began getting an unusual and never-before-seen amount of USCIS Requests for Evidence (“RFE’s”), asking for more and more information, and more and more case law and New York statutory citations to prove New York had a legal basis to make the findings of abuse, neglect, and abandonment contained in their SIJS orders. Soon, we at CHNY and other attorneys became wary of making affirmative applications for immigration relief; of telling our young people that it was safe to come out of the shadows.

Then, in the spring of 2018, USCIS seemed to squeeze harder than it ever had and began to reject eligible CHNY SIJS applicants, claiming, despite longstanding New York statutory laws that in the past USCIS previously accepted as valid and binding, that New York Family Courts have no jurisdiction over children 18 years old. And so new forms of immigration relief—whatever are still left standing—have to be considered and creative solutions to procedural problems have to be developed and implemented.

Yet, developing these new creative solutions while also ensuring that every young person in the RHY system who does not have legal immigration status has access to an attorney, takes time and resources; more resources than are currently available within the RHY system. In closing, CHNY greatly appreciates the New York City Council’s efforts to help protect and safeguard some of our city’s most vulnerable youth. Every undocumented youth within the runaway and homeless youth system needs and deserves to speak with a lawyer to understand



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their rights and explore if they have any avenues to achieve legal status. Therefore, along with creating a strategy and plan of action, additional funding for lawyers in the Department of Youth and Community Development-funded runaway and homeless youth programs is crucial in addressing this problem.

**TESTIMONY OF ASHE MCGOVERN
DIRECTOR, NYC UNITY PROJECT**

**BEFORE THE NEW YORK CITY COUNCIL
COMMITTEES ON YOUTH SERVICES AND IMMIGRATION**

September 17, 2018

Good morning, Chair Rose, Chair Menchaca and members of the Committees on Youth Services and Immigration. My name is Ashe McGovern, and I am the Director of the NYC Unity Project, New York City's first, coordinated, citywide initiative to support and empower LGBTQ young people through innovative policy and program change. I thank you for the opportunity to testify today about the needs of LGBTQ immigrant youth communities, and the relevant services we provide as a city.

LGBTQ MAYORAL COMMITMENTS

As you know, the de Blasio Administration has been and continues to be a champion of LGBTQ equality and justice:

- In April of this year, the Administration announced it would become the largest city in the country to house incarcerated people according to their gender identity, and not their sex assigned at birth;
- In June 2017, the Administration published New York City's first-ever LGBTQ Health Care Bill of Rights, in partnership with the Department of Health and Mental Hygiene;
- In June 2016, New York City became the first municipality to launch a citywide campaign specifically affirming the right of transgender individuals to use the bathroom consistent with their gender identity or expression;
- In March 2016, Mayor de Blasio issued an executive order requiring City agencies to ensure that employees and members of the public are given equal access to City single-sex facilities without being required to show identification, medical documentation or any other form of proof or verification of gender; and
- In December 2015, the NYC Commission on Human Rights issued legal enforcement guidance defining specific gender identity protections under the City Human Rights Law, including equal bathroom access, as well as access to housing, employment, public accommodations, and other protections;
- And in September 2017, this administration launched the NYC Unity Project.

NYC UNITY PROJECT AND LGBTQ IMMIGRANT YOUTH

The Unity Project was created to strengthen and expand upon the Administration's LGBTQ justice commitments—with a focus on meeting the needs of our most vulnerable and marginalized LGBTQ youth, including LGBTQ immigrant youth. In May of this year, the Unity Project announced an unprecedented \$9.5 million commitment over the next three years to address key issues that directly and disproportionately impact LGBTQ immigrant young people.

First, to address the incredibly high rates of LGBTQ youth homelessness: we committed funding to expand three youth drop-in center hours to 24/7 service, in partnership with DYCD, to ensure that for the first time, there will be a 24-hour drop-in center in each borough, where young people can seek services, get connected to case managers, build community and have a safe place to go when they have nowhere else to turn. We also committed funds to create the city's first DYCD shelter serving young

people age 21-24, an initiative made possible by City Council's leadership on addressing youth homelessness.

Second, to address the issue of family rejection among LGBTQ youth, which is the leading cause of LGBTQ youth homelessness, and a key contributor to inequity across multiple areas, we invested in a package of programs to help families develop better tools to support and affirm the LGBTQ young people in their lives. In partnership with ACS and the Ackerman Institute's Gender and Families Project, we are expanding training for parents and caregivers to support LGBTQ youth. We have also created a first of its kind clinical training program, in partnership with the Ackerman Institute, specifically aimed at training clinicians of color, from geographically diverse neighborhoods in New York, to support family acceptance in their clinical work. In partnership with ACS and the LGBT Center, we are expanding a successful family acceptance clinical training program, Project LIFT, which provides training to clinicians working with ACS-involved families, and in partnership with ACS and CAMBA Project Accept LGBTQ Youth (ALY), we committed funds to create bilingual, Spanish-speaking family support services for families of LGBTQ Latinx youth in central Brooklyn

Finally, recognizing the needs of LGBTQ foster care youth, disparities in health equity, and the need to ensure our policies and programs are youth driven, we have also committed funds to: the first-ever confidential foster youth population study, which will include questions about sexual orientation, gender identify, and gender expression, in partnership with ACS; a youth-led participatory action research project to identify youth-driven goals and priorities for LGBTQ family acceptance work with DOHMH; and two new PrEP for Adolescents clinical sites in Harlem and Central Brooklyn, where LGBTQ young people are more likely to seek services and HIV transmission rates are high.

These commitments are directly relevant to the needs of LGBTQ immigrant youth. We know, for example, that according to a national survey of LGBTQ immigrants, most of whom were young people, LGBTQ immigrant youth experience high levels of discrimination and harassment in multiple areas of life including employment, education, health care, and housing.¹ Less than a third of the respondents said they were "out" to their family and friends, and nearly half said they hid or lied about their sexual orientation or gender identity to a health care provider because of fear that they would experience discrimination or mistreatment. Nearly a quarter of respondents (23 percent) said they faced discrimination when seeking a place to live because of their sexual orientation or gender identity, and those rates are even higher when coupled with discrimination as a result of immigration status. Finally, nearly three-quarters (75 percent) of respondents do not have or just barely have enough income to meet their monthly expenses.

The Unity Project is committed to centering the needs of the most vulnerable and marginalized LGBTQ young people in our city—and that absolutely includes addressing the needs of LGBTQ immigrant young people. We are committed to continuing this work, in partnership with City Council, and I am happy to take questions. Thank you.

¹ United We Dream, *No More Closets: Experiences of Discrimination Among LGBTQ Immigrant Community* (2016), <https://unitedwedream.org/wp-content/uploads/2017/07/Report-No-More-Closets-1.pdf>



Testimony of

**Jamie Powlovich
Executive Director
Coalition for Homeless Youth**

Before the

**The New York City Council
Youth Services Committee & Immigration Committee**

On

Int. 0480-2018

September 17, 2018

Introduction

Good morning. My name is Jamie Powlovich, and I am the Executive Director of the Coalition for Homeless Youth (CHY), also known as the Empire State Coalition of Youth and Family Services. CHY has advocated for the needs of runaway and homeless youth (RHY) for 40 years. The coalition is comprised of 60 providers of services to homeless youth across New York State, including 29 members in New York City. Our members include providers that are directly contracted to provide services to RHY as well as agencies that intersect with the RHY population within the larger scope of their work.

I would like to thank Chair Rose, Chair Menchaca, and the members of the Youth Services and Immigration Committees for holding today's hearing. I would also like to thank Councilmembers Dromm and Ayala for introducing the legislation being discussed today. We applaud council for their efforts to ensure the immigration needs of RHY are being supported during a time when our Federal Administration has displayed a bigoted stance towards immigrant and LGBTQ populations, including youth, with new immigration directives that jeopardize their safety and are a violation of their human rights.

Background

New York City has never adequately supported the needs of homeless young people or the providers that serve them. Although under the current Administration many positive steps have been made, we are still only touching the surface of meeting the need. Runaway and homeless youth, as a population, are young people between the ages of 16 and 24 who have unique developmental needs and often fall between the cracks of the State's child welfare and adult homeless systems. The Department of Community Development (DYCD) contracts with various social service agencies to provide short-term crisis shelters, transitional living programs, drop-in centers and street outreach programs which offer food, shelter, case management, mental and medical health care, educational and vocational programming, legal services, programs for young mothers and a plethora of other services. Many homeless young people have previous experiences of trauma and with the juvenile and adult criminal justice systems.¹ A large percentage of youth have had both positive and negative experiences in foster care,² many lack a high school diploma or employment,³ and all have experienced neglect by the systems and adults that were supposed to support them and guide them into adulthood. For too long providers have struggled to meet the needs of the homeless youth in New York City with insufficient resources. Although the actual current number of homeless youth in NYC is unknown, a 2007 study by CHY and Columbia University estimated that on any given night there are 3,800 homeless youth sleeping on the streets of New York City.⁴ However, there are currently only 575 beds to offer them.

Being forced to live on the street puts youth at risk of experiencing violence, sexual exploitation and human trafficking. In a 2013 study by Fordham University and Covenant House New York, approximately one fourth of surveyed homeless youth either fit the federal definition of human trafficking or at some point felt they had no choice but to trade sex for food, money, or shelter.⁵ The trafficking survivors explained how pimps and other traffickers often take advantage of the thinly-stretched RHY shelter system, by informing youth that the shelters are full and offering a place to stay which will eventually lead to exploitation and trafficking.

¹Covenant House. 2014. "Homeless Youth - What We Know..." Available at: <http://ny.covenanthouse.org/homeless-youth-what-we-know>; Empire State Coalition of Youth and Family Services. 2008. "A Count of Homeless Youth in New York City." Available at: http://www.citylimits.org/images_pdfs/pdfs/HomelessYouth.pdf.

² Ibid.

³ Ibid.

⁴Empire State Coalition of Youth and Family Services. 2008. "A Count of Homeless Youth in New York City." Available at: http://www.citylimits.org/images_pdfs/pdfs/HomelessYouth.pdf.

⁵ <http://www.covenanthouse.org/sites/default/files/attachments/Covenant-House-trafficking-study.pdf>

Another critical population over-represented within NYC's homeless youth is LGBTQ people. Nationally, only 5-7% of all youth identify as LGBTQ, but the proportion of homeless youth who identify as LGBTQ is as high as 40%⁶. Compared to other homeless youth, LGBTQ youth are more likely to be sexually or physically assaulted, more likely to be harassed, robbed, or become victims of hate crimes, and more likely to be forced into survival sex or sexual exploitation.

Without access to basic needs, such as food, clean clothes, and a consistent place to sleep, a young person facing homelessness is less likely to pursue or complete their education, less likely to find and sustain employment, and less able to maintain stable mental and physical health. CHY recently completed a three-year research study with NYU on the Impact of RHY programs on homeless youth and their effectiveness across the state. The study shows how effective RHY programs are at changing the trajectories of youth away from crime, chronic homelessness and public assistance and toward success and self-sufficiency, employment, and education along with building individual skills and increasing supportive relationships⁷.

Int. 0480-2018

CHY supports Int. 0480-2018, which would require DYCD to create and implement a comprehensive plan to provide services to RHY who are eligible for Special Immigrant Juvenile Status (SIJS). However, based on feedback from our members, and the experiences of homeless youth themselves, we would like to highlight some challenges that exist, and recommendations CHY has, regarding ensuring youth experiencing homelessness get the immigration supports they need. They are as follows:

Comprehensive Immigration Screenings

Undocumented runaway and homeless youth who seek services from DYCD funded programs each have their own unique story, which may or may not include experiences that could qualify them for several different immigration supports. This bill focuses heavily on referring youth for support with Special Immigration Juvenile Status (SIJS) applications; however, not all homeless youth qualify for SIJS for a variety of reasons which are outlined below, and many providers have reported seeing more success in pursuing T or U Visas, which are available to trafficking victims and victims of other crimes. Therefore, CHY recommends that RHY in DYCD-funded programs, who identify as needing support with their immigration status, should be referred for a comprehensive immigration screening, with someone who is qualified to conduct such an assessment, to ensure that they are exploring all appropriate avenues. In addition, once an appropriate resource has been identified, the process, including all requirements and potential timelines, should be explained to the youth so that they can make the final determination about whether or not to proceed, and/or prepare themselves for any part of the process that could be triggering such as having to contact estranged family members or having to talk about traumatic experiences in detail.

SIJS

As stated above, this bill focuses heavily on referring youth for support with Special Immigration Juvenile Status (SIJS) applications, which we assume is because it was written to mirror Local Law 6

⁶ Durso, L.E., & Gates, G.J. (2012). *Serving Our Youth: Findings from a National Survey of Service Providers Working with Lesbian, Gay, Bisexual, and Transgender Youth who are Homeless or At Risk of Becoming Homeless*. Los Angeles: The Williams Institute with True Colors Fund and The Palette Fund.

⁷ Gwadz, M., Freeman, R., Cleland, C.M., Ritchie, A.S., Leonard, N.R., Hughes, C., Powlovich, J., & Schoenberg, J. (2017). *Moving from crisis to independence: The characteristic, quality, and impact of specialized settings for runaway and homeless youth*. New York: Center for Drug Use and HIV Research, NYU Rory Meyers College of Nursing.

of 2010, which requires the Administration for Children's Services (ACS) to provide increased immigration-related support related to Special Immigrant Juvenile Status (SIJS) for children with child welfare involvement. However, it does not take into account that unlike youth in ACS's care, RHY receiving services in DYCD-funded programs are doing so voluntarily, and DYCD does not have "custody" of youth in their programs. Our members report that a major barrier to RHY being able to complete the SIJS application process is that they are unable to identify an adult to act as their legal guardian, which is a requirement for the application. Secondly, if a RHY is able to identify a guardian that is willing to sign-off on the application, notification must be made to their current legal guardian before the new individual can take over the role. Youth report that this notification poses two issues: 1.) A majority of RHY have left home or were kicked out due to abuse or neglect, and the thought of having to re-engage with those individuals, especially for the purpose of notifying them that they are pursuing a new guardian, can be extremely triggering and traumatic and 2.) many youth who are in need of immigration services do not have guardians who reside in the United States; therefore, to successfully complete the notification, the paperwork must be sent internationally, which can cause delays in the process. We recognize that the real solutions to these issues are outside of the control of City Council, but what we do recommend is that there be a clear expectation that service providers support youth through this process, and provide therapeutic supports to address issues that may arise when re-connecting with their guardians, which could be triggering or cause new trauma.

Funding

Although CHY fully supports meeting the needs of all RHY in need of immigration supports, we feel that it is important to note that there are very few free legal resources that exist that have experience in working with the RHY population, and therefore are sensitive to their unique needs and situations. Currently, there are only two RHY agencies that have legal services onsite, both of which have very limited capacity to process applications at the rate needed. Similarly, there are only a few additional legal supports that RHY agencies can refer to, and they too are often at capacity, and have long waitlists. Given the current political climate, we recommend that funding for legal immigration services be increased as soon as possible through programs such as the Human Resources Administration Immigrant Opportunities Initiative.

Training

CHY is pleased that this bill includes requirements around training for the providers to help identify and support the RHY they serve, and recommend that the training be mandatory, and be conducted by a qualified training provider, who can offer the training multiple times per year to account for changes to immigration laws and staff turnover.

Conclusion

CHY is grateful to the City Council for its ongoing commitment to runaway and homeless youth. We look forward to our continued work together to improve the city's runaway and homeless youth services.

Thank you for the opportunity to testify before you today.



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Testimony of

The Legal Aid Society

on

Int. 480 - In relation to requiring the department of youth and community development to review strategies and create a plan of action to protect children who qualify for special immigrant juvenile status.

Presented before:

Deborah Rose, Chair, Committee on Youth Services
Carlos Menchaca, Chair, Committee on Immigration

Prepared and Presented by:

Theresa Moser, Staff Attorney, Juvenile Rights Practice
Beth Hofmeister, Staff Attorney, Homeless Rights Project
Beth Krause, Supervising Attorney, Immigration Law Unit

September 17, 2018
New York, New York

Introduction

The Legal Aid Society (LAS) welcomes this opportunity to testify before the New York City Council Committees on Immigration and Youth Services regarding Int. No. 480, which would require the Department of Youth and Community Development (DYCD) to create a plan of action to support immigrant youth in New York City. We thank Deborah Rose for using her role as Chair of the Youth Services Committee to repeatedly highlight the needs of runaway and homeless youth (RHY) over the past year. Similarly, we thank Immigration Committee Chair Carlos Menchaca for his proven dedication to our City's vibrant immigrant community. We also thank Councilmember Daniel Dromm for his ongoing commitment to young people, especially LGBTQ youth. We must also thank Council Speaker Corey Johnson and his staff, whose hard work and commitment to our City's vulnerable populations is steadfast and ongoing.

Local Law 6 of 2010

It is our understanding that Int. No. 480 was written as a sibling to Local Law 6 of 2010, which requires the Administration for Children's Services (ACS) to provide increased immigration-related support, especially support related to Special Immigrant Juvenile Status (SIJS), for children in its care and receiving services. At the time, LAS strongly supported the proposed law as a means to protect immigrant youth. For years prior to the bill's passage, LAS staff participated in workgroups and testified at both relevant City Council hearings regarding the bill's development and passage. Since Local Law 6 of 2010 came into effect, staff have seen the positive impact of this legislation: ACS now identifies children in its care who may be eligible for SIJS and other immigration benefits sooner (which is particularly important for SIJS and other age-limited benefits), and is better at making timely referrals to immigration legal service providers. In addition, because the local law delineates the responsibilities of an ACS or provider agency caseworker to help obtain the necessary legal documents, immigration attorneys are able to finalize SIJS applications for children in ACS care more quickly and smoothly. Requirements, such as directing ACS to secure a young person's birth certificate, were consistent with already-existing state regulations,¹ but formalized a process and expectation for these key steps of the SIJS application process.

Int. No. 480

Today's hearing focuses on how the City, through DYCD, can provide similar support to RHY being served in youth shelters and related programs. While LAS always supports the protection of youth and our immigrant community, we are mindful of how RHY and youth under ACS' care are distinct populations, and want to ensure that the implications of those distinctions are taken into consideration. In particular, the bill's emphasis on SIJS and its data and monitoring requirements, while suited for youth under ACS's care, are actually ill-tailored to the particular needs of the RHY population.

¹ See 18 NYCRR § 428.3(b)(2).

Generally, Int. No. 480 does not take into account the legal difference between youth who are receiving services from ACS and those who are voluntarily engaged in the RHY shelter system. Children who are in the custody of ACS, and many whose families receive preventive services from ACS, are also under the jurisdiction of the NYC Family Court. Family Court jurisdiction is a necessary predicate for SIJS. By contrast, most youth who have contact with DYCD providers are not under Family Court jurisdiction. In addition, DYCD does not have custodial authority over any of the young people it serves. While RHY depend upon the shelter and services that DYCD providers offer, those services are voluntary. Providers do not have the authority or the resources to pursue youth who choose to leave their program, in order to ensure that they receive all the benefits to which they may be entitled. By contrast, ACS, because of its child protective mission, must pursue young people who leave its care without authorization and often follows up with families who withdraw from ACS-supported programs, even when ACS does not have custody of the children.

Because they are not under Family Court jurisdiction, a very high percentage of youth who are engaged with DYCD providers may not be eligible for SIJS. For a young person to be eligible to apply for SIJS in New York City, among other requirements, the Family Court must have (1) declared them dependent on the court or placed them in the custody of a state agency or individual appointed by the court, (2) determined that reunification with at least one of their parents is not viable because of abuse, neglect or abandonment, or a similar basis under State law, and (3) concluded that it would not be in their best interests to be returned to their country of origin. *See* 8 U.S.C. § 1101(a)(27)(J).

Chapin Hall, an independent policy research center at the University of Chicago, recently released a study indicating that LGBT youth have a 120% higher risk for homelessness than other youth.² This is consistent with a 2012 report by the NYC Association of Homeless and Street Involved Youth Organizations showing that lesbian, gay, bisexual, and questioning youth make up 25-40% of the homeless youth population in NYC and other large cities,³ compared with 3-6% of the general population.⁴ Family rejection is often a primary reason why youth are not able to remain in their homes, but those circumstances do not generally lead to Family Court involvement, which is a predicate for applying for SIJS.

More commonly, family rejection and other causes of youth homelessness lead to commercial sexual exploitation of youth. While it is difficult to explain all of the ways in which youth experience homelessness in New York City, there are common threads. Not surprisingly, homeless youth in New York face myriad dangers, obstacles, and simply frightening circumstances as they navigate the City trying to survive, and survival often involves entry into the street economy. Many homeless youth are pressured to trade sex for a place to sleep or shower, and about one-third to half of these youth exchange sex for

² Chapin Hall of the University of Chicago, *Missed Opportunities: Youth Homelessness in America*.

³ Empire State Coalition of Youth and Family Services, *The New York City Association of Homeless and Street-Involved Youth Organizations' State of the City's Homeless Youth Report*, 2009.

⁴ http://news.gallup.com/poll/182051/san-francisco-metro-area-ranks-highest-lgbt-percentage.aspx?utm_source=Social%20Issues&utm_medium=newsfeed&utm_campaign=tiles.

money, food, or a place to stay.⁵ Many are victims of sex trafficking.⁶ This experience may allow RHY to access immigration benefits other than SIJS, such as U and T nonimmigrant visas, that are available to trafficking survivors and victims of certain other violent crimes.

Additionally, RHY are at high risk of involvement with the juvenile or criminal justice system due to their homelessness and resulting involvement with the street economy.⁷ Apart from the inherent stress involvement with the criminal justice system brings, a criminal or juvenile record can impact a person's immigration admissibility and deportability, making the federal government more able and willing to deport them.

There can be no doubt that providing immigrant RHY with access to immigration benefits can be life-changing, opening doors to education, full employment and other opportunities to some of our City's most vulnerable young people. Because of their vulnerabilities, it is critical that immigrant RHY are connected to competent immigration legal services providers who can help them evaluate their options and also navigate the potential risks of applying for immigration benefits, in light of the immigration grounds of inadmissibility and deportability.

Int. No. 480 requires DYCD to create and implement a comprehensive plan to provide RHY who may be eligible for immigration benefits with access to immigration legal services. This portion of the proposed legislation has our support although our clients report they are already able to access immigration services, including referrals to legal services. We note that to best serve children and youth in all of its programs, DYCD should be called upon to develop a plan to make information about immigration legal services available to all DYCD program participants and their families, rather than to RHY program participants exclusively.

We are similarly supportive of training requirements for the providers to help identify and support the young people they serve. We note that DYCD and RHY provider employees should not be called upon to provide immigration advice. Their training should be focused upon identifying youth who may be in need of immigration legal services, and making timely referrals for those services. DYCD's plan should also ensure that training is mandatory and offered frequently, in light of high staff turnover.

We appreciate that the bill language calls for DYCD's plan to "track such runaway and homeless youth, *to the extent practicable and consistent with confidentiality requirements*, until the completion of their special immigrant juvenile status or other immigration relief." (Emphasis added.) It is important to recognize, however, that the RHY population may be more transient than the population served by ACS, and that, as a result, it may be

⁵ Meredith Dank et al. The Urban Institute, *Surviving the Streets of New York: Experiences of LGBTQ Youth, YMSM, and YWSW Engaged in Survival Sex*, February 2015; Marya Viorst Gwadz et al., *The initiation of homeless youth into the street economy*, 32 *Journal of Adolescence* 357, 358 (2009).

⁶ Ric Curtis et al., *The Commercial Sexual Exploitation of Children in New York City* (September 2008), available at http://www.courtinnovation.org/sites/default/files/CSEC_NYC_Executive_Summary.pdf.

⁷ See generally *Id.*; Dank, et al., *supra*; Youth Justice Board, Center for Court Innovation, *Homeless Not Hopeless: A Report on Homeless Youth and the Justice System in New York City*, June, 2017.

impossible for DYCD and its RHY providers to track RHY who are in need of immigration benefits through the completion of any immigration procedures that might be available. For youth who remain in RHY programs, the providers may be able to track their access to immigration services, but that information would be subject to the strict confidentiality standard in the RHY regulations. For youth who leave RHY programs, the providers would have no way of tracking their immigration outcomes. Moreover, since the RHY programs are voluntary, intense tracking requirements may in fact become a deterrent to accessing services, especially in the current political climate where increased scrutiny can make a young immigrant feel more exposed.

The bill also calls for DYCD and RHY providers to assist RHY in need of immigration legal services in securing birth certificates if they do not possess them. While birth certificates as well as passports are necessary to secure certain immigration benefits, many young people are unable to obtain birth certificates from their home countries and need to seek assistance from local consulates, whose policies vary widely, may be costly and time-consuming, and may require consent of parents or custodians, who are frequently unwilling or unable to consent. City involvement in this process is essential. Because RHY providers lack the personnel and financial resources to assist RHY in with securing their birth certificates, we recommend that this support be centralized at DYCD, perhaps with the assistance of ACS and/or the Mayor's Office of Immigrant Affairs, which may have existing relationships with local consulates.

Conclusion

Thank you again to the Committees on Immigration and Youth Services for looking so closely at a number of issues facing our immigrant runaway and homeless youth. We applaud the spirit behind Int. No. 480 and we hope the Committees will consider adjusting the bill to address the concerns we have raised here. We are happy to answer any questions.

About The Legal Aid Society

The Legal Aid Society, the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal and juvenile rights matters, while also fighting for legal reform.

The Legal Aid Society has performed this role in City, State and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 1,100 lawyers, working with some 800 social workers, investigators, paralegals and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

LAS's legal program operates three major practices — Civil, Criminal and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by LAS's Pro Bono program. With its annual caseload of more than 300,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 300,000 individual cases and legal matters, LAS's law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is uniquely positioned to speak on issues of law and policy as they relate to New York City's immigrant community and runaway and homeless youth. Each of our three practice areas routinely interacts with the immigrant and RHY population.

The Civil Practice Immigration Law Unit (ILU), founded in the 1980s, provides legal representation to vulnerable New Yorkers seeking relief for themselves and their families. We assist those in detention and fighting unlawful deportations, and represent low-income individuals in gaining and maintaining lawful status. In 2002, ILU launched the Immigrant Youth Representation Project (Youth Project) to respond to the special needs of undocumented youth in New York City. Since its inception, the Youth Project has provided training, outreach, direct representation, and policy advocacy, assisting many New York City undocumented youth in obtaining Special Immigrant Juvenile Status (SIJS) or other immigration benefits. Combining this representation with affirmative litigation work, we strive to ensure that families are able to stay together and stabilize their living situations.

Over the most recent year, ILU assisted in over 5,200 individual legal matters benefiting over 10,000 New Yorkers citywide. Since the start of the Trump Administration, LAS has been on the frontline of efforts to defend New Yorkers against an overtly anti-immigrant federal administration that threatens to tear our communities apart. This year alone, we filed over two dozen habeas petitions in federal court, either seeking to end prolonged detention by U.S. Immigration and Customs Enforcement (ICE) or to prevent imminent deportation; filed a class action on behalf of children forcibly separated from their families and facing removal by ICE; and filed or joined amicus briefs against the administration's harmful policies on administrative closure and continuances in immigration court, on access to abortions by young women detained by the Office of Refugee Resettlement, on the immigration consequences of vacated criminal convictions, and on the legality of Deferred Action for Childhood Arrivals. The administration's shifting immigration enforcement priorities and rapidly changing policies represent a direct assault on what it means to live in New York, in what has always been an international city built around the diversity fostered by a thriving immigrant community. While the leadership shown by the City in defending immigrant New Yorkers through initiatives such as expanding access to comprehensive legal services establishes New York City as among the most progressive in the nation, the

current situation for immigrant New Yorkers represents a crisis point for our city in many ways.

The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the *Callahan* and *Eldredge* cases. The Legal Aid Society is also counsel in the *McCain/Boston* litigation in which a final judgment requires the provision of shelter to homeless families. LAS, in collaboration with Patterson Belknap Webb & Tyler, LLC, filed *C.W. v. The City of New York*, a federal class action lawsuit on behalf of RHY in New York City. Our goal in litigation is to ensure that the City creates and maintains enough youth-specific beds to meet the needs of *all* youth seeking shelter. Last year, LAS, along with institutional plaintiffs Coalition for the Homeless and Center for Independence of the Disabled – NY, settled *Butler v. City of New York* on behalf of all disabled New Yorkers experiencing homelessness.

Legal Aid's Juvenile Rights Practice provides comprehensive representation as attorneys for children who appear before the New York City Family Court in abuse, neglect, juvenile delinquency, and other proceedings affecting children's rights and welfare. Last year, our staff represented approximately 34,000 children. Last year, LAS's Civil Practice provided free direct legal assistance in more than 48,500 cases and legal matters through neighborhood offices in all five boroughs, and 23 specialized units, of which the Homeless Rights Project is one. Our Criminal Practice handles over 220,000 trial and post-conviction cases a year, some of which arise out of arrests predicated on our clients' homeless status. Our perspective comes from daily contact with children and their families, and also from our frequent interactions with the courts, social service providers, and State and City agencies.

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TESTIMONY OF:

Laura Berger – Immigration Unit
BROOKLYN DEFENDER SERVICES

Presented before
The New York City Council Committee on Immigration
and the Committee on Youth Services
Oversight Hearing on
LGBTQ Immigrant Youth in New York City
and
Int. 480-2018

September 17, 2018

My name is Laura Berger. I am a staff attorney in the Immigration Unit at Defender Services (BDS). BDS is a full-service public defender office in Brooklyn, representing nearly 35,000 low-income New Yorkers each year who are arrested, charged with abuse or neglect of their children, or facing deportation. I thank the New York City Council Committee on Immigration and the Committee on Youth Services for the opportunity to testify about LGBTQ Immigrant Youth in New York City and Int. 480-2018.

Since 2009, the BDS Immigration Unit has counseled, advised, or represented more than 10,000 immigrant clients. Our Immigrant Youth and Communities Team has represented thousands of Brooklyn residents in their applications for lawful immigration status and in non-detained removal proceedings. Highlights of our work include representing young people in their pursuit of Special Immigrant Juvenile Status (SIJS) or Deferred Action for Childhood Arrivals (DACA). Since 2013, we have screened and represented 220 SIJS eligible young people. We specialize in the most complex cases, representing young people who reside in Brooklyn and have significant criminal court involvement or whose parents have ACS involvement.

Background

An estimated 3,800 young people in New York City experience homelessness each day.¹ Youth who identify as lesbian, gay, bisexual, transgender, or queer (LGBTQ) and Black and Latinx youth are disproportionately impacted by homelessness. While LGBTQ youth are estimated to make up only 5-7% of the population, they make up approximately 40% of the City's homeless youth population.² Similarly, nearly 90 percent of NYC shelter residents are Black or Latinx.³ One fifth of New Yorkers are immigrants, 30,000 are DACA-holders, and many are undocumented and unaware of their immigration status.⁴

In spite of the important protections for immigrants passed by the Council, immigrant youth without citizenship in New York City, particularly immigrant youth of color, homeless, and LGBTQ immigrant youth, are at constant risk of ICE detection. Instead of providing shelter and services for youth, the City too often relies on the criminal legal system to handle this population's complex needs. Homeless youth are at great risk since so many activities that are unavoidable are criminalized, such as being in a park after closing, sleeping on the subway, or public urination. Nationally, 39% of homeless LGBTQ youth have had involvement with the juvenile justice system.⁵ Youth in the juvenile justice system disproportionately identify as LGBT (13-15 percent), with 40% of incarcerated girls identifying as LGBT.

For undocumented youth, these arrests also put them on ICE's radar. A summons or misdemeanor arrest may put a youth at risk of deportation, sometimes accompanied by months or years of detention, while their immigration case is pending. An arrest or conviction for a crime of survival may compromise eligibility for SIJS or other immigration relief.

Runaway and Homeless Youth Services

Last year, BDS represented over 270 homeless clients under age 25. Each year public defenders in Brooklyn serve around 500 homeless 16- and 17-year-olds alone, a vast majority of whom are not being served by RHY providers because of the lack of services in Brooklyn. About half of the youth are made homeless by the criminal justice system when the court issues an order of protection against the youth for 90 days after a criminal allegation involving a domestic disturbance, making it illegal for the young person to return home.⁶ The other half disclose to

¹ Root Cause, *New York State Report: Education and youth Development, Improving Outcomes for Homeless Youth*, September 2012, available online <http://www.rootcause.org/docs/Resources/Research/Improving-Outcomes-for-Homeless-Youth/Improving%20Outcomes%20for%20Homeless%20Youth-%20New%20York.pdf>

² Nico Sifra Quintana, Josh Rosenthal & Jeff Krehely, *On the Streets: The Federal Response to Gay and Transgender Homeless Youth*, June 2010, available at <https://www.americanprogress.org/issues/lgbt/reports/2010/06/21/7983/on-the-streets/>

³ Coalition for the Homeless, *New York City Homelessness: The Basic Facts*, September 2018, available online at <http://www.coalitionforthehomeless.org/basic-facts-about-homelessness-new-york-city/>

⁴ Migration Policy Institute, *Deferred Action for Childhood Arrivals (DACA) Data Tools: DACA-Eligible Populations by State and County*, 2016, available at <http://www.migrationpolicy.org/programs/data-hub/deferred-action-childhood-arrivals-daca-profiles>.

⁵ The Equity Project, *LGBT Youth & Juvenile Justice, 2014*. Available at <http://www.equityproject.org/wp-content/uploads/2014/12/ACT4JJ-LGBT-Fact-Sheet-November-2014.pdf>

⁶ As a matter of practice in Brooklyn, prosecutors regularly ask for and judges regularly issue a full order of protection in cases involving "domestic violence," even though these are normal disputes between teenagers and their parents. Full Orders of Protection, in effect, usually render our young clients homeless. In contrast, in New Jersey, when EMT's respond to a domestic disturbance involving a youth, they take the youth to the Emergency

their defense team that they are living with friends or significant others because of a breakdown of the relationship with their parents.

RHY shelters are permitted by the New York State Office of Children and Family Services (OCFS) and run with the New York City Department of Youth and Community Development (DYCD). Young people who access RHY services are eligible for 2 types of shelter: crisis shelter for 60-120 days and transitional independent living (TIL) shelter for up to 24 months. Additionally, drop in centers are available in each borough where youth can access services such as case management, legal assistance, and mental health and medical care.

RHY providers report that they serve over 1,000 youth from Brooklyn per year (at facilities almost exclusively located in Manhattan). We estimate that Kings County would need at least 300 crisis shelter beds to ensure that no Brooklyn youth was forced to sleep on the street, sleep on the train, couch surf, or trade sex for shelter.⁷ Currently, there are only 28 beds for youth in Brooklyn and no beds for youth who do not identify as LGBTQ.

Special Immigrant Juvenile Status

Special Immigrant Juvenile Status is a path to Green Card status available to many young people living in the US. Youth must meet five criteria to qualify, (1) be under the age of 21; (2) be living in the United States; (3) be unmarried; (4) have a valid juvenile court order which finds that the child is a dependent of the court or state or that the child has experienced abuse, abandonment, or neglect; and (5) it is not in the child's best interest to return to their country of origin.

Once a young person is connected to an immigration attorney, they must work together to prepare their case and find a sponsor guardian who can sponsor the young person. Then, the case is filed in Family Court for guardianship. In my experience, this court proceeding can take as little as 3 months but in some courts takes up to a year. After establishing guardianship, an immigration case for SIJS must be filed. This process takes about one and a half years for youth from countries with smaller numbers of immigrants, but for youth from Mexico, El Salvador, Guatemala, and Honduras the process can take up to 4 years. From the time a young person first walks into my office to the time they receive their green card based on SIJS status, over 5 years may have passed.

Recommendations

Provide more safe shelter space and respite centers for RHY youth in Brooklyn

The vast majority of runaway and homeless youth must seek crisis shelter beds in Manhattan where they are too often turned away for lack of beds. Runaway and homeless youth have been made homeless by failures of the education system, juvenile and adult criminal legal systems, the family court and foster care systems, and adults who have failed to properly care for them. The

Room rather than arresting them. If NYC were to adopt this approach 250 youth in Brooklyn every year would avoid court-mandated homelessness.

⁷ *Testimony of Amy Albert, Presented before the New York City Council Committee on Juvenile Justice and the Committee on Justice System Oversight hearing on NYC's Preparedness to Raise the Age, April 18, 2018.*

City can and must address the youth homelessness crisis by opening youth crisis shelters in Brooklyn, the Bronx, Staten Island, and Queens.

Provide reimbursement for capital investments to RHY service providers to allow them to open crisis shelters in the outer boroughs

We have been told that RFY providers are unable to open new crisis shelters in boroughs like Brooklyn because the City currently does not fund capital investments.⁸ The City should assist RHY providers to locate and secure bed space in Brooklyn as landlords are often reluctant to lease to shelter providers. Even better, the City could renovate existing City buildings such as old hospitals or schools for this purpose and then issue RFP contracts for use of these spaces. The availability of high-quality services is critical to the ability of New York's homeless youth to break the cycle of homelessness and court involvement.

End Broken Windows Policing

The legacy of broken windows policing is that low-income people of color in certain New York City neighborhoods are disproportionately targeted by police for arrest for conduct that would not result in any police interventions for others. For homeless and LGBTQ youth, interactions with police are commonplace. Arrests for low-level offenses may flag young people for deportation, and convictions can preclude immigrant youth from immigration relief or make those with lawful status deportable.

Limit information sharing between city agencies and ICE

Young people applying for Special Immigrant Juvenile Status must have a family member or other close adult appear in Family Court to be granted guardianship or custody over the young person. Some Family Court judges and referees require that the proposed guardians and all other adults in the household be fingerprinted as a pre-requisite to being granted guardianship. Others will waive this requirement when good cause is shown. There is no statutory fingerprinting requirement for guardians of the person pursuant to Family Court Act § 661(a) and SCPA 1704(8). These fingerprint checks can result in ICE enforcement against the young person's family members. We encourage all New York City judges and referees to reconsider making these fingerprint checks mandatory in all guardianship cases.

Introduction 480-2018

Intr. 480-2018 would amend the administrative code of the City of New York to require DYCD to create and implement a plan requiring RHY service providers to identify youth who may qualify for SIJS or other immigration relief, assist these youth in obtaining legal services, and track youth until the completion of their immigration cases.

We support the effort to ensure that all eligible young people obtain these essential services, but we believe that this bill is the wrong approach and we respectfully request an opportunity to engage with Council staff, service providers and other stakeholders to determine the best way forward.

⁸ Please see our previous testimonies before the City Council, available on the Brooklyn Defender Services website at www.bds.org/#policy.

Systems to track SIJS eligible RHY through their immigration process may compromise youth confidentiality and, due to the length of immigration cases, may be impractical. If enacted, great caution must be used to respect client confidentiality while information is shared between RHY service providers, DYCD, and the Council.

Additionally, monitoring and reporting on case outcomes will be difficult, as 5 years may pass before a youth receives permanent residence through SIJS. RHY may stay in transitional independent living programs for up to 24 months, but average young person stays in a crisis shelter for only 21-60 days.

Conclusion

We applaud the City Council for your commitment to run away and homeless youth and immigrant communities in New York City, and believe more must be done to identifying youth who may qualify for SIJS status. Due to lack of beds, many young people are turned away when seeking housing and may never receive a screening. These youth will continue to fall through the cracks. In order to prevent this, there should be free, voluntary, and confidential Know Your Rights trainings and immigration clinics set up for youth and their families in their communities, schools and in hospitals. These programs can help to identify young people who need help and connect them with legal services.

We encourage the City Council to further invest in housing for young people and continue to support agencies like ours that provide free immigration services to New Yorkers. Thank you for your time and consideration of this important issue.



Council on American-Islamic Relations

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**STATEMENT OF
PRINCESS MASILUNGAN
LEGAL FELLOW
COUNCIL ON AMERICAN-ISLAMIC RELATIONS, NEW YORK, INC.**

**BEFORE THE
COMMITTEES ON YOUTH SERVICES AND IMMIGRATION
NEW YORK CITY COUNCIL**

**FOR A HEARING CONCERNING INT 480 - IN RELATION TO
REQUIRING THE DEPARTMENT OF YOUTH AND COMMUNITY
DEVELOPMENT TO REVIEW STRATEGIES AND CREATE A PLAN OF
ACTION TO PROTECT CHILDREN WHO QUALIFY FOR SPECIAL
IMMIGRANT JUVENILE STATUS**

**PRESENTED
Monday, September 17, 2018**

Good morning, my name is Princess Masilungan, and I am a legal fellow at the New York Chapter of the Council on American-Islamic Relations (“CAIR-NY”). CAIR-NY is a leading civil rights organization for the Muslim community here in New York State. Today, I speak in support of INT 480, which requires the Department of Youth and Community Development to create and implement a plan to identify and provide services to runaway and homeless young people who may be deemed eligible for Special Immigrant Juvenile Status (“SIJS”). I also thank and applaud Chairs Rose and Menchaca for calling today’s hearing on this vital topic.

SIJS is crucial for immigrant children because of the Trump administration’s systematic closure of pathways to documented immigrant status, particularly for the most vulnerable groups. The Trump era continues to threaten and traumatize immigrant communities across the United States, and while the majority of Muslim Americans are not immigrants, those without legal status find themselves particularly targeted. The Trump administration enacted three separate Muslim Bans, causing widespread fear and confusion within the Muslim community and ultimately restricting immigration from numerous Muslim-majority countries.¹ The Trump administration also reduced the number of countries whose nationals are eligible for Temporary Protected Status, a crucial tool for individuals who have fled extreme violence in their home countries at the hands of their own governments.² The Trump administration then continued its tirade, attempting (but failing) to repeal DACA, the more well-known program that provides a pathway for young people to break out of immigration limbo and allows them to contribute to their families and communities, in a still ongoing court battle.³ This attack on DACA has caused some young undocumented Muslim children to feel as if they were “under a unique kind of siege,” living “under a government that can be as Islamophobic as it often is xenophobic.”⁴

Just this month, the Trump administration announced its plan to indefinitely jail immigrant children with their families, reversing twenty years of protections for immigrant children.⁵ Furthermore, leaks suggest that the Trump administration will expand public charge as a grounds for inadmissibility and block green card applicants who use *any* means-tested benefits, including those to secure food and medical care for their child, even if their child is a U.S. Citizen, which New York

¹ Lawrence Hurley, *U.S. Top Court Upholds Trump Travel Ban Targeting Muslim-Majority Nations*, REUTERS (June 26, 2018), <https://www.reuters.com/article/us-usa-court-immigration/u-s-top-court-upholds-trump-travel-ban-targeting-muslim-majority-nations-idUSKBN1JM1U9>.

² Zuzana Cepka, *Fact Sheet: Temporary Protected Status*, NAT’L IMM. FORUM (May 5, 2018), <https://immigrationforum.org/article/fact-sheet-temporary-protected-status/>.

³ Andrew Chung, *U.S. Court Orders Trump Administration to Fully Reinstate DACA Program*, REUTERS (Aug. 3, 2018), <https://www.reuters.com/article/us-usa-immigration-daca/u-s-court-orders-trump-administration-to-fully-reinstate-daca-program-idUSKBN1KP014>.

⁴ Aviva Stahl, *The End of DACA is the Latest Nightmare for Undocumented Muslims*, VICE (Sept. 5, 2018), https://www.vice.com/en_us/article/8xxpx5/the-end-of-daca-is-the-latest-nightmare-for-undocumented-muslims.

⁵ Nathaniel Weixel, *Trump Administration Moves to End Limits on Detaining Migrant Children*, THE HILL (Sept. 6, 2018), <http://thehill.com/homenews/administration/405342-trump-administration-moves-to-end-limits-on-detaining-migrant>.

City officials have warned would leave the children of immigrants seeking green cards the most vulnerable.⁶

The Trump administration's repeated attacks on immigrant children and young adults make it urgent that the City Council pass INT 480. INT 480's requirement that the Department of Youth and Community Development monitor changes and create a plan of action to help support young people while applying for SIJS is more important now than ever before, with the threat still looming of Mr. Trump manipulating the immigration system further to the detriment of our communities.

INT 480's charge for the Department to identify homeless and runaway youth who qualify for SIJS would also greatly help bring SIJS back to its original purpose. The federal government created SIJS nearly thirty years ago to provide humanitarian protection for abused, neglected, or abandoned immigrant children eligible for long-term foster care, in recognition of immigration law's failure to provide such protection.⁷ Now, Mr. Trump's recent policy reversal, excluding 19-21 year olds, has moved SIJS away from its original purpose, distorting and reducing access to SIJS.

Mr. Trump's policy reversal may affect upwards of 1,000 young people in New York State.⁸ In April, less than a month after the SIJS reversal, USCIS told numerous children across New York state that their previously approved applications would be removed, and denied applications from at least 81 others just in New York City alone.⁹ This process was not just heartless, it was arbitrary, as shown when USCIS denied the application of a previously eligible young Brooklynite, while approving his younger sister's virtually identical application.¹⁰ In another case, USCIS denied the application of a young woman who has lived in the Bronx with her grandmother since about eight months old.¹¹ Both of these individuals would have qualified for SIJS prior to the policy reversal, but Mr. Trump robbed them of that opportunity in one swift action.

In light of the confusion and inconsistencies that have resulted from the reversal, INT 480 will give the Department the power and responsibility to ensure that the spirit and rationale behind SIJS live on by encouraging homeless and runaway youth to take advantage of SIJS. We're hopeful that with the passage of INT 480, this council's impact will reverberate even beyond those communities, inspiring young people generally not to exist in fear of a system that is seemingly against them but to overcome and take advantage of the pathways to documented immigrant status and protections that still exist.

⁶ Liz Robbins, *How Trump's Plan for Immigrants on Welfare Could Hurt a Million New Yorkers*, N.Y. TIMES (Aug. 13, 2018), <https://www.nytimes.com/2018/08/13/nyregion/welfare-immigrants-trump-public-charge-rule.html>.

⁷ Leslye E. Orloff and Rafaela Rodrigues, Eds., NIWAP, STATE JUST. INST., AM. U. WASH. COLLEGE OF LAW, SPECIAL IMMIGRANT JUVENILE STATUS BENCH BOOK 1 (2018), <http://library.niwap.org/wp-content/uploads/SIJS-Bench-book-complete.pdf>.

⁸ Liz Robbins, *A Rule is Changed for Young Immigrants, and Green Card Hopes Fade*, N.Y. TIMES (Apr. 18, 2018), <https://www.nytimes.com/2018/04/18/nyregion/special-immigrant-jvenile-status-trump.html>.

⁹ *Id.*

¹⁰ Complaint at 5, R.F.M. v. Nielsen, 18 Civ. 5068 (S.D.N.Y. June 7, 2018), <https://bit.ly/2wLzqkH>.

¹¹ *Id.*



24 WEST 25TH STREET, 9TH FLOOR, NEW YORK, NY 10010 • WWW.LATINOIDS.ORG

September 17, 2018,

FOR THE RECORD

RE: City Council Joint Committee Hearing, Oversight LGBTQ Immigrant Youth in New York City, Int 480

As a young adult who works at the Latino Commission on AIDS I see the impact that the lack of protections has on Immigrant LGBTQ children, youth and young adults. I also see the challenges of accessing culturally and linguistically competent health and human services, that are also absent of structural homophobia, transphobia, racism and anti-immigrant sentiments. As a member of the staff that works at Oasis, Latino LGBTQ Center I understand that it is crucial to acknowledge that immigration or being foreign-born is also risk factor. In 2016, the national data shows that new HIV cases decreased among gay/bi white men, stabilized among African-American gay/bi men. However, the number has increased among Latino gay/bi men of all age groups, but much higher among children and youth (ages 13-24). Approximately, 60% of infections occurred among foreign-born Latino gay/bi men and transgender Latinas. Latino YMSM experienced the largest increase in diagnosed HIV infections out of all other racial/ethnic groups. LGBTQ immigrant youth are at a higher risk for substance use, sexually transmitted infections (STIs), cancers, cardiovascular diseases, obesity, bullying, isolation, rejection, anxiety, depression, and suicide as compared to the general population. Immigrant LGBT youth receive poor quality of care due to stigma, lack of healthcare providers' awareness, and insensitivity to their unique needs.

Ensuring high-quality care for LGBTQ immigrant youth requires providers to understand principles of caring for LGBTQ immigrant individuals as well as those of caring for young people more generally. LGBTQ youth are at elevated risk of human immunodeficiency virus (HIV) infection, sexually transmitted infection (STI), pregnancy, obesity, substance use disorders, mood and anxiety disorders, eating disorders and other body image-related concerns, peer bullying and family rejection¹²³⁴⁵⁶⁷ LGBTQ youth may avoid seeking health care due to fear of discrimination, and even once in care, may fear disclosure of their sexual orientation or gender identity and therefore withhold truthful responses from their health care providers. Transgender youth face the added burden of locating providers with sufficient knowledge, competence, and experience to affirm their gender identity.^{8 9} LGBTQ youth are also disproportionately more likely to be homeless,¹⁰ and in many cases, this may be due to parental rejection or other trauma.¹¹

¹ Institute of Medicine. The Health of Lesbian, Gay, Bisexual, and Transgender People: Building a Foundation for Better Understanding. Washington, DC: 2011. [\[PubMed\]](#)

² Wilkerson JM, Rybicki S, Barber CA, Smolenski DJ. Creating a culturally competent clinical environment for LGBT patients. *J Gay Lesbian Soc Serv.* 2011;23(3):376–394.

³ Schultz D. Cultural competence in psychosocial and psychiatric care: a critical perspective with reference to research and clinical experiences in California, US and in Germany. *Soc Work Health Care.* 2004;39(3–4):231–247. [\[PubMed\]](#)

⁴ Yehia BR, Calder D, Flesch JD, et al. Advancing LGBT Health at an Academic Medical Center: A Case Study. *LGBT Health.* 2014 [\[PubMed\]](#)

⁵ Human Rights Campaign Foundation Health & Aging Program. *Healthcare Equality Index 2014: Promoting Equitable and Inclusive Care for Lesbian, Gay, Bisexual and Transgender Patients and Their Families.* Washington, DC: 2014.

⁶ Kann L, Kinchen S, Shanklin SL, et al. Youth risk behavior surveillance—United States, 2013. *MMWR Surveill Summ.* 2014;63(Suppl 4):1–168.

⁷ Agwu AL, Lee L, Fleishman JA, et al. Aging and Loss to Follow-up Among Youth Living With Human Immunodeficiency Virus in the HIV Research Network. *J Adolesc Heal.* 2015;56(3):345–351. [\[PMC free article\]](#) [\[PubMed\]](#)

⁸ Rachlin K, Green J, Lombardi E. Utilization of health care among female-to-male transgender individuals in the United States. *J Homosex.* 2008;54(3):243–258. [\[PubMed\]](#)

⁹ Sanchez NF, Sanchez JP, Danoff A. Health care utilization, barriers to care, and hormone usage among male-to-female transgender persons in New York City. *Am J Public Health.* 2009;99(4):713–719. [\[PMC free article\]](#) [\[PubMed\]](#)

¹⁰ Corliss HL, Goodenow CS, Nichols L, Austin SB. High burden of homelessness among sexual-minority adolescents: findings from a representative Massachusetts high school sample. *Am J Public Health.* 2011;101(9):1683–1689. [\[PMC free article\]](#) [\[PubMed\]](#)

¹¹ Whitbeck LB, Chen X, Hoyt DR, Tyler KA, Johnson KD. Mental disorder, subsistence strategies, and victimization among gay, lesbian, and bisexual homeless and runaway adolescents. *J Sex Res.* 2004;41(4):329–342. [\[PubMed\]](#)

The Latino Commission on AIDS and the Hispanic Health Network are in support of a local law to amend the administrative code of the city of New York, in relation to requiring the department of youth and community development to review strategies, create, and implement a plan of action to protect children who qualify for special immigrant juvenile status.

To best serve Immigrant LGBTQ Youth we recommend that services:

Ensure cultural and linguistic competency as well as sensitivity on gender identity, and sexual identities/orientations:

Language is a major barrier for many Immigrant LGBTQ Youth to access services. Important to understand the impact of social determinants of health and cultural issues among Immigrant LGBTQ Youth. It is recommended that the Interagency Language Roundtable (ILR) Scale be used to measure linguistic competency. Staff should have a proficiency ranking level 3+ or above.¹²

Provide capacity building for behavioral interventions and research on issues that impact the health of LGBTQ Immigrants, especially those that are challenged by language: Building the capacity of medical and non-medical service providers that work in health and human services and the establishment of protections dedicated to the health care needs of immigrant LGBTQ youth are important to address their issues in a culturally responsive and safe space. **Mental Health Research** is also a priority, as research identified mental health issues related to poverty, loneliness, depression, undocumented immigration status, family stress, discrimination, access to care, and stigma as impacting the health of Immigrant LGBTQ Youth.

Create awareness and provide cultural competency training to assist service providers in addressing issues of stigma and discrimination among Immigrant LGBTQ Youth: Culturally responsive HIV/AIDS/HCV screening, health and sex education, must be available to Immigrant LGBTQ Youth. Training should include information about local immigrant communities, their characteristics, and their challenges, to help navigate their unique barriers to health.

There is a need for continued support for policy changes that address the complexities of stigma, homophobia, immigration, and cultural barriers that deter health care access for Immigrant LGBTQ Youth, especially among those ages 13-29.¹³

1. Continued Protection and Coverage of New Yorkers with Temporary Protected Status: "Support Assembly Bill 9594A and Senate Bill 7569A to ensure that temporary protected status beneficiaries continue to receive Medicaid benefits if the federal government ends the program."
2. Expansion of the Child Health Plus Program: Support Assembly Bill 8054 to expand Child Health Plus coverage to all New Yorkers up to age 29 earning incomes up to 400% of the federal poverty level, regardless of immigration status. This would provide young adult immigrants with access to coverage that is equivalent to the coverage offered to other New Yorkers of the same age in the Essential Plan or through Qualified Health Plans in the Marketplace.
3. Expanding coverage to all New Yorkers regardless of status: "Create a state-funded Essential Plan for all New Yorkers up to 200% of the federal poverty level, regardless of immigration status. New York State should not have immigration status-based restrictions on health coverage."

We feel confident that access to services will be accomplished by working together and ensuring the creation, and implementation of a plan of action to protect children, youth and younger adults who qualify for special immigrant juvenile status.

Luciano Reberte

¹² Interagency Language Roundtable Scale used by governmental and non-governmental agencies across the U.S., a needed system that is objective, applicable to all languages and all Civil Service positions, and unrelated to any particular language curriculum.

¹³ Latino Gay and Bi Men's Blueprint Implementation Recommendations, Latino Commission on AIDS.

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: 09-17-18

(PLEASE PRINT)

Name: Tha'asryel - Akhmed Bishop

Address: 549 Throop Ave, 3L

I represent: Youth Action Board

Address: NYC

THE COUNCIL
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Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: SKYE O'NEAL ADBIAN

Address: 1133 OGDEN AVENUE, BRONX, NY, 10452

I represent: MYSELF

Address: N/A

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Appearance Card

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in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Kathleen Almanzar

Address: DYCP

I represent: Senior Director, Citracap + immigrant services

Address: _____

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Appearance Card

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in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Randy Scott

Address: _____

I represent: DYCD Assistant Commissioner

Address: for Unbride 20th

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THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9/17/18

(PLEASE PRINT)

Name: Jordan Dressler

Address: _____

I represent: NYC Human Resources Administration

Address: 4 WTC

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THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9/17/18

(PLEASE PRINT)

Name: Assistant Commissioner (MOIA) Kavita Pawia-Sanchez

Address: _____

I represent: MOIA

Address: _____

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Appearance Card

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in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JEFFREY COLT

Address: _____

I represent: COVENANT HOUSE NY

Address: 400 WEST 41ST STREET

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 0480 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jamie Powlowich

Address: 495 Flatbush Ave #38 Brooklyn, NY

I represent: Coalition for Homeless Youth 11225

Address: Same as above

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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: Ashie McGovern, Director of the Unity Project

Address: _____

I represent: Unity Project

Address: 253 Broadway

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Appearance Card

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

in favor in opposition

Date: 09/17/2018

(PLEASE PRINT)

Name: Laura Berger

Address: _____

I represent: Brooklyn Defender Services

Address: 177 King's Cross, 7th Floor, Brooklyn, NY

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 480 Res. No. _____

in favor in opposition

Date: 9/17/18

(PLEASE PRINT)

Name: Theresa Moser

Address: 199 Water St NY NY 10038

I represent: The Legal Aid Society

Address: same

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. 400 Res. No. _____

in favor in opposition

Date: 9/17/18

(PLEASE PRINT)

Name: Eve Stotland

Address: 35-20 77th St Jackson Heights

I represent: The Door

Address: 121 Ave of the Americas

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THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. 480 Res. No. _____

in favor in opposition

Date: 9/17/2018

(PLEASE PRINT)

Name: Princess Masilungan

Address: _____

I represent: CAIR-NY

Address: 46-01 20th Ave Astoria NY 11105

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