

Submitted via Federal eRulemaking Portal

December 30, 2019

Samantha Deshombres, Chief, Regulatory Coordination Division,
Office of Policy and Strategy
U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS)

Re: Agency DHS, Docket No. USCIS-2019-0010 Public Comment Opposing the Imposition of Fees for form I-589 Application for Asylum and Form I-765, Asylum Applicant-Related Employment Authorization Application. In the Federal Register at 84 F.R. 62280.

Dear Ms. Deshombres:

The seven (7) national torture treatment programs below respectfully submit this comment to oppose the Department of Homeland Security's Notice of Proposed Rulemaking on Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements. More specifically, we are concerned by the proposed fee for the Asylum Form I-589 and initial Form I-765 Employment Authorizations for asylum seekers, DHS Docket No. USCIS-2019-0010, issued November 14, 2019.

The proposed rule will be extremely detrimental to survivors of torture, who comprise a shocking percentage of the refugee and asylum seeking populations. It is yet another step by the administration to punish asylum seekers for seeking refuge in the United States. Torture survivors' ability to obtain legal relief and to work is key to their mental health and wellbeing. This rule will obstruct both, and so hinder survivors' healing and further expose them to re-traumatization and re-victimization.

For the reasons detailed in the comments that follow, DHS and USCIS should immediately withdraw their current proposal and dedicate their efforts to advancing policies that safeguard individuals fleeing persecution, including torture.

Thank you for the opportunity to submit comments on this proposed rule. Please do not hesitate to contact us with any questions or for further information.

Andrea Carcamo /s/
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Scott Roehm /s/
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DETAILED COMMENTS in opposition to DHS, Docket No. USCIS-2019-0010. Public Comment Proposed Rulemaking on Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements.

The seven undersigned torture treatment Programs welcome the opportunity to comment on the proposed inception of a fee to file Form I-589, Application for Asylum, and the initial employment authorization Form I-765 for asylum seekers, DHS Docket No. USCIS-2019-0010 (“the proposed rule,” or “the rule”).

The signatory organizations seek to advance the knowledge, technical capacities and resources devoted to the care of torture survivors living in the United States and act collectively to prevent torture worldwide.

As experts in the provision of mental health and other rehabilitation services to survivors of torture and other trauma, we are intimately familiar with the profound effects that this proposed rule will have on our clients, including making the U.S. asylum process effectively insurmountable.

I. Background

On November 14, 2019, the Department of Homeland Security (DHS) published a notice of Proposed Rulemaking. The proposed rule would increase the USCIS fees by a weighted average of 21 percent, add significant new fees for a number of filings, and eliminate certain fee waivers. A number of fee increases affect asylum seekers: for the first time in the agency’s history, USCIS will charge \$50 for submission of Form I-589, application for Asylum and for Withholding of Removal (“asylum application”) and \$490 for the initial Form I-765, Application for Employment Authorization (EAD) for asylum seekers. There is no waiver provided for either of these fees.

Currently, asylum seekers whose asylum cases have been pending without a decision for at least 150 days from the date the asylum application was filed can submit an application to receive an EAD—they qualify for a work authorization at 180 days, but they are allowed to submit the application for processing 30 days earlier. Timely work authorization, however, has not been a matter of right; for example, if the applicant causes delays in her asylum proceedings she must wait longer before qualifying for an EAD.

USCIS seems to have understood over the years the difficulty for asylum seekers in obtaining resources when they newly arrive to the U.S., since the agency has always exempted them from the initial EAD fee and the fee for the asylum application itself.¹ In fact, pursuant to a regulation in place since 1994, USCIS has been required to adjudicate the EAD application within 30 days

¹ 8 C.F.R. section 274a. 12(c)(8) (“The U.S. Government has never charged a fee for Form I-589, but rather has relied on other fee-paying benefit requestors to subsidize asylum seeking applicants. Application fees from other form types have always been used to fund the operations involved in processing asylum claims.” E.g. 81 FR 73295 and 73307).

of receiving it with the purpose of “ensur[ing] that bona fide asylees [and asylum-seekers] are eligible to obtain employment authorization as quickly as possible.”²

II. This rule is part of a larger scheme by the administration to punish asylum seekers who come to the United States, and to deter others from trying

Through the establishment of policies, agreements, and dubious unilateral changes to well-settled asylum law, it is clear that the Trump administration seeks to prevent individuals—especially, but not only, those arriving at our southern border—from accessing the U.S. asylum process at all, much less actually obtaining asylum. These actions form the backdrop to the proposed rule and include the following:

Changing asylum immigration law: The attorney general certified to himself several immigration court cases and decided them in a way that upends longstanding law. In overruling *Matter of A-B-* and *Matter of L-E-A-*, the attorney general made it significantly more difficult for individuals from Central America to win their asylum cases, since they largely rely on these two cases.

Zero Tolerance leading to Family Separation: The administration adopted a policy of pursuing criminal charges against every individual who crossed the border outside of a port of entry, then forcibly separated children from the parents who were subjected to criminal proceedings. Family separation was a cruel practice that traumatized both children and parents. It will have long lasting consequences for asylum seekers and for the United States.³

Asylum Ban 1.0: In November 2018, the president issued a proclamation banning individuals who enter the United States between ports of entry from asylum.⁴

Migrant Protection Protocols: Established in January 2019, this policy forces asylum seekers to wait in dangerous Mexican border cities during the pendency of their cases. Besides placing asylum seekers in danger, it undermines their ability to obtain assistance of counsel, greatly diminishing their ability to win their case.⁵

Asylum Ban 2.0: In July 2019, the administration disqualified from asylum any individual who transited through a third country before arriving at the United States southern border. This disqualifies all but Mexican asylum seekers arriving at our southern border from asylum.⁶

² 84 F.R. 47148 at 47153.

³ Center for Victims of Torture. Asylum Fact 4. Available at <https://www.cvt.org/AsylumFact4> (last accessed on 12/30/2019).

⁴ <https://www.federalregister.gov/documents/2018/11/09/2018-24594/aliens-subject-to-a-bar-on-entry-under-certain-presidential-proclamations-procedures-for-protection>.

⁵ Human Rights First. Delivered to Danger: Illegal Remain in Mexico Policy Imperils Asylum Seekers’ Lives and Denies Due Process. Available at <https://www.humanrightsfirst.org/sites/default/files/Delivered-to-Danger-August-2019%20.pdf> (last accessed on 12/30/2019).

⁶ <https://www.federalregister.gov/documents/2019/07/16/2019-15246/asylum-eligibility-and-procedural-modifications>

Agreements with other countries: The Trump administration continues to attempt to enter into “safe third country” agreements with countries that simply are not safe—from which people are fleeing violence and persecution that these countries’ governments cannot, or will not, effectively address—including El Salvador, Guatemala, and Honduras. These agreements would essentially trap asylum seekers in the countries where they are being persecuted or are otherwise at significant risk of harm.

Work Authorization Restrictions: In addition to the fee for work authorizations established through this rule, a separate proposed rule—published on the same day—doubles the time an asylum seeker must wait before qualifying for a work permit (from 180 days to 365 days) and imposes additional restrictions on eligibility. A third proposed rule eliminates entirely the time limit previously imposed on USCIS to adjudicate work authorization applications, which implicitly authorizes the agency to delay any such adjudication indefinitely.

III. The proposed rule will have profound health consequences for asylum-seeking torture and trauma survivors, will effectively bar many of them from seeking asylum, and will subject them to heightened risk of being re-victimized.

In justifying the \$50 fee for form I-589, Application for Asylum and for Withholding of Removal, when that form is filed with USCIS (affirmative asylum applications), the government claims that the \$50 “could be paid in one payment, and would not require an alien an unreasonable amount of time to save.” Similarly, with regard to the EAD fee, the government argues that it “ensures asylum applicants will pay no more for an EAD than any other EAD applicant except those for whom the fee has been waived.” This reasoning is fundamentally flawed; it assumes that asylum seekers arrive under circumstances substantially similar to other EAD applicants, or otherwise have easy access to significant resources. They do not. The overwhelming majority of asylum seekers arrive to the United States having suffered traumatic experiences, whether in the country from which they fled or on the often-perilous journey in search of safe haven, with no more than the possessions they can carry. According to the Department of Health and Human Services, research “suggests that 44% of refugees, asylees, and asylum seekers living in the U.S. have experienced torture.”

Clinicians and their colleagues from torture treatment programs across the United States engage with this population every day. They know from first-hand experience how important employment is for effective rehabilitation, and the consequences for refugee and asylum-seeking trauma survivors who do not receive timely work authorization—from obstructing their recovery to forcing them into an underground economy where they risk being re-victimized. They also recognize that the fees imposed by the proposed rule will prevent many from even a *chance* at obtaining asylum.

The following clinicians offer their views directly on the proposed rule:

Andrea Northwood, Director of Client Services (Center for Victims of Torture)

For torture survivors who have fled for their lives into exile, the period of time between arriving in a country of refuge and obtaining asylum is one of extreme psychological

vulnerability and fragility. This is when survivors are most at risk, most distraught by recent trauma and losses, and least supported: they lack adequate food, clothing, shelter, health care, social support, employment authorization, legal support and legal assistance. They usually have medical and psychological wounds from their torture that have not received any treatment. This often puts their lives literally at risk: they can present at our doors with life-threatening physical conditions and life-threatening psychological symptoms, including suicidality and torture-related flashbacks that result in dangerous activities such as walking into traffic or leaving shelter at night in a semi-conscious state.

Just a delay in the grant of a work authorization will deliberately increase this period of extreme risk, which is both immoral and inhumane. This will have a direct and immediate harmful effect on the lives of our asylum-seeking clients . . . We believe such an inhumane measure is also a fundamental violation of human rights, which include the right to seek asylum and the right to be free from torture. It punishes those who have come forward with honesty and presented their cases lawfully, making no distinction between cases with merit (in our case, this can include forensic evidence such as medical documentation of scars from torture) and the so-called frivolous claims the policy purports to address.

In addition to the basic necessity of income in order to survive and support a family in danger back home, sitting around all day with nothing to do is described as a major stressor (at best) and even a cause of insanity (“going crazy”) by our asylum-seeking trauma survivors, as they use “keeping busy” and meaningful activity to distract themselves from involuntary, disturbing traumatic memories as well as profound sadness and loss. One of the first priorities of rehabilitation at CVT is to rebuild meaningful activity into the lives of asylum seekers by helping them with employment-readiness activities until their work permit arrives and, as soon as it does, employment itself. This is because this change alone produces a reduction in emotional distress and calms people down.

Anne Eichmeyer, MSW, LICSW and Vivienne Namujuzi, MSW, LGSW (Center for Victims of Torture)

A client from a country in Southeast Asia has struggled with severe PTSD and Depression from his torture, including nightmares, flashbacks, inability to sleep, and significant suicidal ideation. His identity is strongly connected to his profession, and prior to receiving his work permit in the US he faced very high levels of stress and shame because he was unable to work. He faced multiple delays in receiving his work permit from the government. Once he received his work permit he received a job offer within a couple of weeks. Since receiving this offer his symptoms have improved significantly. He is able to sleep better because of the reduction in stress; this in turn has increased his capacity to address his PTSD, and he had learned coping skills to deal with flashbacks and anxiety. *When he first came to the US he was forced to work illegally in order to provide for his basic needs.* Since finding a legal job he expresses pride in being able to give back to the country that does not persecute and torture him for being who he is.”

Alison Beckman, M.S.W., L.I.C.S.W., Senior Clinician for External Relations (Center for Victims of Torture)

Most of our clients have pro bono attorneys, most have no money. Our social workers brainstorm ways for clients to pay for \$3 prescription co-pays. They help clients figure out how to access food shelves and get donated winter clothing. \$50 is an enormous amount of money for someone who has none. \$490 is impossible for most. Needing to wait a full year after applying for asylum to apply for a work permit and then wait for an un-prescribed amount of time to be issued the permit will be devastating to our clients, most of whom go on to receive asylum with legitimate claims.

Jennifer Scofield, MSW, LGSW and Amy Kamel, MA, MSW, LICSW (Center for Victims of Torture)

One client was severely tortured in her home country in Africa, and several of her family members were tortured and/or killed. This client is currently living with a distant family member, with whom the client has a limited relationship. She is not allowed a key to the house, and she is expected to be at the house all the time. If she does leave she is often locked out. The client has very limited access to food, and she is forced to sleep on the floor. She cannot access food shelves because she is unable to leave the house. She does not have access to hygiene items, socks, or underwear; she has inappropriate shoes and clothing for winter. She has high blood pressure, and is not able to regularly access blood pressure medications both because of cost (\$3 copays are an insurmountable burden) and because she is unable to pick them up. In addition to PTSD and Major Depression, she was diagnosed with HIV upon her arrival in the US.

Ariel Zarate, MA, MSW, Survivors of Torture Clinical Case Manager (International Rescue Committee, Denver)

Many of the torture survivors that the Survivor Wellness Center at IRC Denver supports are asylum seekers who want nothing more than to recreate safe, meaningful lives. They want to contribute to their community and to care for their families. They want to rebuild themselves, separate from the abuses they and their families have endured. Key to this is the ability to work. Work is more than a means to financial stability but an element of human dignity and a Universal Human Right.⁷ For torture survivors, work is a path to reassert their humanity, to take back agency that was lost as they were tortured. When meeting with clients, the primary, consistent stressor is work. Second only to housing and food, work is what keeps clients up at night, and what triggers anxiety, depression and traumatic withdrawal.

“I am just sitting here like nothing; I don’t want to just sit; I want to do.”

This sentiment is universal; as is the aversion to “hand – outs.”

⁷ UN General Assembly, *Universal Declaration of Human Rights*, 10 December 1948, Article 24.

“If I were not desperate, if I had another choice, I would never beg.”

Beyond this, work is a way for survivors to buffer themselves against the intrusive, disruptive and dysregulating memories of their torture. Images of the ways that their bodies, minds and lives were damaged can be persistent and very distressing. Work gives survivors a goal and a focal point outside of these experiences. Work gives survivors hope.

Gwen V. Mitchell, PsyD, MA International Disaster Psychology (MAIDP), Assistant Professor/Director of Field Placements Graduate School of Professional Psychology University of Denver

I am concerned about the proposed changes to the statute on issuing work permits for asylum seekers. From a psychosocial and mental health perspective, work permits and the solidification of meaningful employment is an essential component to a recently arrived asylum seeker's recovery and adjustment to the United States. The World Health Organization (WHO) defines “[t]he conditions in which people are born, grow, live, work and age” as social determinants of health. Work permits and the subsequent aftereffects of obtaining and sustaining gainful employment are an essential part of healing and recovery for the asylum seekers we work with.

Jordan N. Enger, MA, LPC Psychosocial Support and Survivors of Torture Clinical Care Coordinator (International Rescue Committee, Denver)

My clients are survivors of torture as defined on the 18 U.S. Code §2340 which we use to determine eligibility and admission into our program at the International Rescue Committee in Denver, CO. Since starting the program in October 2018, there are approximately 42 survivors to whom we are providing biopsychosocial and legal support, most with pending asylum applications. Asylum seekers do not meet the criteria to receive temporary assistance through the government with medical issues, food, childcare or money for housing. The time our clients spend without a work permit causes significant stress for them. They are unable to find safe and sanitary housing, unable to cover their medical bills, unable to pay for groceries to support themselves and family members—and these compounding effects fill the days they cannot work with anxiety. Having a work authorization not only bridges asylum seekers with basic needs, but it also engages their minds, allowing them to feel as if they can regain control over their lives. A work authorization offers a sense of hope to asylum seekers, something that they may not have experienced since they were tortured and had to flee their home country. Clinically we have seen many clients become more isolated while awaiting work authorization, which is counter-productive when working toward wellness and holistic well-being. Having the ability to be productive and financially independent initiates hopefulness, which matches with determination to build a safe opportunity to live for themselves and their family, and can lead to a stronger mental outlook and dedication to their community. I strongly encourage these benefits to be prioritized as they affect asylum seekers significantly as well as our community.

Amanda McDonald, Social Worker & Targeted Case Management Supervisor (Center for Victims of Torture)

Many clients are unable to provide for their own basic needs so many live couch to couch, on the floor of basements or in common rooms. Many only eat when they are offered meals resulting in minimal access to food. A lack of income means a lack of access to transportation so some are unable to take the bus to vocational services that will prepare them for work. CVT can bridge the gap by providing referrals to food shelves, and bus cards but unmet needs remain and many suffer in silence. Once clients receive a work permit some report feeling like they are safer here because they have a card that reflects their legal presence, which aids in sleep and stress reduction. Clients are motivated to work quickly and do. It has been astounding to me how eager clients are to work in mostly difficult, grueling roles as many first receive employment in manual labor at factories, restaurants, etc. Once clients are working they are able to discontinue use of CVT donated bus cards and food which contributes to their sense of independence and self-efficacy. Most notably to their mental health, it allows them to send money back home which often pays basic needs like food, rent and medical care for their children or relatives.

Caitlin Tromiczak LICSW-C, LCSWC, Health and Psychological Wellness Program Manager, Creator & Facilitator of Torture Abolition and Survivors Support Coalition (TASSC) Training Program (TASSC)

At TASSC, we provide holistic services to support survivors of torture; many of whom are seeking asylum and struggling to create stability during the extensive process of waiting for interviews and court dates. While we offer support in the form of therapeutic services, cultural orientation, legal support, and career development, what we cannot do is provide financially for them. More importantly, we cannot restore in our clients the sense of dignity and self-worth that comes from being able to work for oneself. Although a great deal of our survivors bring impressive resumes with high levels of education and professional accomplishments, without a work permit they are unable to support themselves or contribute to society as they so desperately desire. Many basic necessities such as housing and food are provided by generous members of the community including religious and diaspora groups, however generosity has its limits and without the ability to work, our survivors are at extreme risk of homelessness, illness, and hopelessness. Some of our survivors have been waiting several years for their asylum interview or court date and if they were unable to obtain a work permit the cost to their mental, emotional, and physical wellbeing would be severe. There is no psychological support we can offer to offset these detrimental effects of abject poverty. Access to a work permit is essential for survival.

Alison Beckman, M.S.W., L.I.C.S.W, Senior Clinician for External Relations (Center for Victims of Torture)

His face dropped when I told him he would have to wait 180 days after the submission of his asylum application to apply for a work permit. He owned two businesses in his country, lived a good life with his family. He had to flee because he was targeted and tortured on multiple occasions for assumed affiliation with an opposition party. He had been in the US for many months, finding an attorney and meeting with him when the attorney was available to fill in the details for his asylum application. This is common among our clients: they often wait months before the application is complete. Then they wait another 180 days to apply for a work permit, and then they wait another month or more to receive it by mail from the US government. Any money he might have fled with is likely long gone. He is ineligible for public benefits, living with extended family and depending on their generosity, which will likely wane as the months go by and the strain of adding additional dependents weighs on families already living on the edge of poverty. These are the kinds of scenarios we work with on a daily basis at CVT.

...

Most of our clients have Posttraumatic Stress Disorder and Major Depressive Disorder. The symptoms related to these diagnoses are maintained and worsened when clients have nothing to do all day long. Many of our clients sit alone during the day at whatever temporary place they are staying doing nothing. And doing nothing brings back reminders of their torture experiences, increased guilt for not being able to help family members back home, increased hopelessness about a future. Work helps counterbalance all of this. We see a return to a sense of self, meaning, purpose for our clients who can work. They are actively contributing to US society both in their needed labor and in paying taxes. Why would we want these talented individuals to be idle and potentially pull on systems as their health worsens?

Laura Rambikur, LCSW & MDiv, Clinical Therapist (International Rescue Committee, Arizona)

For our clients a job is more than just a way to earn money, it represents the restoration of human dignity and healing. It symbolizes the essence of American values: to be able to work, contribute to society, and participate as a member of the community. The proposed changes that were announced earlier in September that eliminate the requirement that USCIS process work permit applications for asylum seekers within 30 days of filing will have a detrimental impact on our asylum seeking communities. At best, this policy will paralyze asylum seekers. At worst, it has the potential to create a market for labor exploitation that will force asylum seekers to engage in harmful, unlawful, and risky forms of employment, which could endanger their legal claims. This policy hurts immigrants who are within the boundaries of the legal structures that exist in our current immigration system. Exploitation and abuse will be a direct result of this policy. Healing happens in stable environments when one is able to provide for oneself and when people are recognized not by their past trauma and suffering, but by their resiliency and ability to contribute, find meaning, and create a new identity.

Maria Childress, MSW, LCSW - Director, St. Louis Partnership for Survivors of Torture (Bilingual International Assistant Services)

Bilingual International Assistant Services respectfully opposes the Department of Homeland Security's Notice of Proposed Rulemaking on the imposition of a fee to asylum applications and initial work authorization for asylum applicants. Bilingual International's St. Louis Partnership for Survivors of Torture and War Trauma provides integrated services to torture survivors in an effort to assist survivors with healing from the past and creating meaningful lives in the present. While the agency supports asylum seekers who have fled torture with support through therapy, case management, legal assistance and psychiatry, it cannot provide survivors with the financial support required to meet their basic needs.

The proposed rule will significantly harm survivors of torture. Earning money through work is an essential element in the ability of torture survivors to heal from past victimization and build safer lives. Survivors are especially vulnerable while waiting to obtain asylum. During this time, they struggle with the physical and psychological consequences of torture, as they try to meet the basic needs of housing and food for themselves and their families. In the agency's experience, asylum seekers are willing and eager to work. The legitimate ability to work provides an initial sense of safety, furthering the healing process. When asylum-seeking survivors are not able to obtain authorization to work due to the inability to pay a \$490 fee, they may be forced to work in unlawful, exploitative work environments, putting them at risk for abuse in these environments and delaying their ability to heal.

Bilingual International Assistant Services requests that, rather than removing the opportunity to seek work, the current work authorization process for torture survivors seeking asylum be maintained and prioritized.

Jennifer Scofield, MSW, LGSW and Amy Kamel, MA, MSW, LICSW (Center for Victims of Torture)

In exchange for shelter and the limited food from her host, one of our clients is expected to provide child care at all times to the host's young child. Often the client will wake up in the morning and find that she is alone with the child, and she is therefore unable to leave in order to attend scheduled medical or mental health appointments. The client has stated that this is expected of her because she does not pay rent.

This client is Christian and has a strong connection to her faith, but she cannot access her faith community in the US because of exploitation and control from her host.

This client received her work permit 8 months after applying for asylum. She was a successful professional in her home country, but has not been able to continue in her field in the US. Her ability to leave home is extremely limited, but she is connected with a vocational rehabilitation counselor, and is working with a social worker to apply for jobs. Her HIV is worsening, and she is in constant pain. She suffers from a lack of independence because of the exploitation and control in her living situation, and PTSD symptoms have shown little to no improvement. She has ongoing nightmares of her torture, made worse by the stress of her living situation. Had she been able to access a work permit sooner, this client could potentially have found employment while she was physically well; this would have increased her access to basic needs, medical care, mental

health care, and shelter, and therefore she may have avoided exploitation, isolation, and the decline in her physical and mental health.

Clients who are forced to wait longer for work permits, or who cannot access money to apply for work permits, are susceptible to exploitation in return for basic needs being met. In addition, a lack of independence and lack of access to medical and mental health care may result in significant declines in functioning.

IV. The proposed rule will cause a considerable loss in federal tax revenue.

The implementation of the rule will cause significant losses in federal tax revenue. If individuals do not have a work authorization due to their inability to afford the fee of the application their employers cannot deduct taxes from their pay checks. Another proposed rule that removes the 30-day limit USCIS has to approve a work authorization estimated that losses to the federal government, in the form of lost contributions to Medicare and social security, range “from \$39.15 million to \$118.54 million.” As the proposed rule is likely to limit even further the number of asylum seekers who can afford a work permit, the loss will be considerably greater.

V. The administration’s claim that the asylum application fee is acceptable under the 1951 Refugee Convention because three of the Convention’s 147 signatories—including Iran—impose such a fee is laughable

The administration claims that the asylum application fee imposed by the rule does not violate the 1951 Refugee convention because three of the 147 signatories to the Convention—Iran, Fiji and Australia—also charge fees for asylum applications. But that fact suggests precisely the opposite: that 98 percent of signatories *do not* impose such fees is strong evidence that doing so *would* violate the convention. The claim is even less persuasive given that, unlike the proposed rule, both Fiji and Iran provide fee waivers and Australia has an exemption for detained asylum seekers.

Conclusion

The administration must abstain from implementing the proposed rule, which will continue to harm the asylum system, asylum seekers generally, and survivors of torture specifically.

Sincerely,

Bilingual International Assistant Services
Center for Survivors of Torture
Center for Victims of Torture
IRC, AZ
IRC Denver
Mount Sinai Human Rights Program
TASSC