

November 3<sup>rd</sup>, 2020

The Honorable Mike Pompeo  
Secretary of State  
Department of State  
2201 C Street NW  
Washington, DC 20230

The Honorable Chad Wolf  
Acting Secretary of Homeland Security  
Department of Homeland Security  
1880 2nd Street Southwest  
Washington, DC 20528

Dear Secretary Pompeo and Secretary Wolf,

We write to you as members of Refugee Council USA (RCUSA), a coalition of 29 organizations promoting protection, welcome, and excellence within refugee resettlement, to express our disappointment at the abysmally low refugee ceiling of 15,000 and to urge you to provide more operational flexibility by adopting crucial technical changes, specified below, to the new categories of refugee admissions outlined in the Report to Congress on the Proposed Refugee Admissions for FY2021 and the Presidential Determination on Refugee Admissions for FY2021. Absent these changes, we estimate that only about 7,000-8,000 refugees will actually be able to arrive this fiscal year. Tens of thousands of refugees already in the vetting process will suddenly be excluded, including the majority of the 36,000 Congolese refugees currently within the U.S. refugee admissions program (USRAP) pipeline who no longer fit within any of categories, as well as many of the 27,000 [refugees](#) from Somalia, Syria and Yemen who continue to face harrowing protection needs abroad.

Specifically, we ask that the Administration amend the narrow, exclusive description of the FY2021 “Other” allocation category and revert to the nonexclusive language used to introduce this category in FY2020, namely: “Other refugees not covered by the foregoing categories, including...” We also urge that you include in the “Other” category specific language committing to resettle all refugees who were ready for departure as of September 30, 2020, and a commitment to resettle unaccompanied refugee minors.

We also ask that the State Department work with the Department of Homeland Security to schedule refugee interviews and circuit rides as soon as possible in Quarters 1 and 2 of FY2021 so that refugees can continue to be processed and be ready to travel to the United States. This will ultimately help to save time and resources, as increased and timely circuit rides will decrease the rates of expired security and health checks before travel.

To ensure the U.S. can meet the FY2021 refugee admissions goal, the State Department should also be able to maintain flexibility between the various allocation categories as was expressed in the recently signed Presidential Determination that stated that the Department of State can “transfer unused admissions from a particular allocation above to one or more other allocations.” For example, if the Iraqi P-2 or the Northern Triangle categories continue to have processing delays, our projections show that as many as 3,850 slots in the Iraqi P-2 category and as many as 200 slots in the Central American category will not be used, particularly in light of the low arrival numbers for these categories in FY2020 (notwithstanding the pandemic). Should that be the case, those slots should be designated during the year for a category that has fewer processing obstacles, such as the religious persecution category or the “Other” category (if it is restored to its FY2020 parameters, as recommended above).

The newly proposed FY2021 categories may also threaten family unity, as some refugee families may not be able to depart together because one refugee provided a religious claim, while the other has a valid ground for refugee status but not a religious persecution claim (e.g., elderly parents and adult children). This will potentially separate families, fracturing support systems. To address this obstacle to family unity, we urge that you add this language to the following-to-join/ P-3 category: "...or refugees who are otherwise joining family members already in the U.S." To address the obstacles for persecuted religious minorities,<sup>1</sup> we urge you to add a third bullet with the following language to the religious persecution allocation category: "...are from persecuted religious minorities in countries designated by the Department of State as countries of particular concern for violating religious freedom;"

We also express concern about the states and localities consent language in the Presidential Determination referring to section 412(a)(2) of the Immigration and Nationality Act (8 U.S.C. 1522(a)(2)). Congress has already provided a mechanism for states and localities to be consulted in determining the best fit between a refugee's needs and resources available in a local community. This does not mean that states are able to block refugees from being resettled in their state, which would have detrimental consequences for refugee families and the communities that want to host them.

We ask that the administration rebuild the refugee program at this time of unprecedented global displacement, and at minimum, work towards reaching the 15,000 refugee admissions goal for FY2021 by adopting the allocation changes outlined in this letter, ensuring flexible operation of the program.

Thank you for considering our recommendations. We welcome a meeting with you to discuss our concerns, and a follow-up meeting date and time can be scheduled with Adam Hunter, Executive Director of RCUSA, at [ahunter@rcusa.org](mailto:ahunter@rcusa.org).

Sincerely,

Chris Palusky  
President and CEO  
Bethany Christian Services

Erol Kekic  
Senior Vice President, Immigration and Refugee Program  
Church World Service

Tsehay Teferra, Ph.D.  
President and CEO  
Ethiopian Community Development Council, Inc.

Mark Hetfield  
President and CEO  
HIAS

---

<sup>1</sup> Persecutors sometimes target religious minorities by squelching their political opinion or membership in a particular social group and the refugee status determination marks the case as persecution on account of political opinion or social group membership. By adding the bullet point to the religious persecution allocation section, it ensures religious minorities are protected in countries that have egregious violations of religious freedom.

Nazanin Ash  
Vice President, Global Policy and Advocacy  
International Rescue Committee

Joan Rosenhauer  
Executive Director  
Jesuit Refugee Service/USA

Krish O'Mara Vignarajah  
President and CEO  
Lutheran Immigration and Refugee Service

Bill Canny  
Executive Director  
Migration and Refugee Services/USCCB

Gina Cummings  
Interim Vice President for Policy and Advocacy  
Oxfam America

Sasha Chanoff  
Founder and Executive Director  
RefugePoint

Eric Schwartz  
President  
Refugees International

Nili Yossinger  
National Director  
Refugee Congress

Scott Roehm  
Washington Director  
The Center for Victims of Torture

Karina Ambartsoumian-Clough  
Executive Director  
United Stateless

Eskinder Negash  
President and Chief Executive Officer  
U.S. Committee for Refugees and Immigrants

Jen Foy  
Senior Vice President of US Programs  
World Relief

CC:

Carol O'Connell, Acting Assistant Secretary, Bureau of Population, Refugees and Migration (PRM), Department of State

Larry Bartlett, Director, Refugee Admissions Program, Bureau of Population, Refugees and Migration (PRM), Department of State

Ken Cuccinelli, Acting Director, U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security