

**Protect  
Immigrant  
Families!  
Comment on:  
FLORES**



**Make a public comment against the  
detention of immigrant children!**

## **About the administration's proposed rule which would eliminate long existing "Flores" settlement protections for migrant children:**

The administration's "zero tolerance" policy separated immigrant families at the border, causing public outcry. In response, the administration has taken steps to reduce separations at the border, but has now proposed another damaging practice of jailing immigrant families and children together for indefinite periods of time while their immigration cases are processed.

On Sept. 7, 2018, the administration released a proposed regulation titled, "Apprehension, Processing, Care, and Custody of Alien Minors and Unaccompanied Alien Children" which seeks to change the provisions of the 1997 "Flores Settlement Agreement" or "Flores." The proposed new policy would allow for the indefinite detention of immigrant children and families, including asylum seekers, and dismantle Flores protections.

The existing Flores agreement has set standards for the detention, release, and treatment of children—including both accompanied and unaccompanied—and has highlighted family unity and protections, requiring:

- 1) *Children be released from custody without delay and preferences release to a parent;*
- 2) *Where they cannot be released because of significant public safety or flight risk concerns, children must be held in the least restrictive and an appropriate setting; generally, in a non-secure facility licensed by a child welfare entity.*

In addition to going against faith values of protecting the vulnerable and supporting families, this proposal rejects proven alternatives to mass detention, which are more humane and are over 99% effective. They also are less expensive for U.S. taxpayers.

During the height of the family separation crisis, reporters and lawmakers brought to light horrifying conditions in current U.S. detention centers. This new proposed rule to eliminate Flores would allow the federal government to set different standards for holding families and children and attempt to undermine independent oversight of conditions. It also reduces vulnerable families' access to due process and humanitarian protections.

**(See sample language and how to submit comments on back.)**

## Suggested Sample Comments Against Ending Flores:

*Use these suggestions to inspire your own unique comment—as duplicate comments will only be counted once!*



My faith values lead me to oppose the proposed rule “**Apprehension, Processing, Care, and Custody of Alien Minors and Unaccompanied Alien Children**” ICEB-2018-0002 because:

- Jesus cared deeply for the protection and love of children, saying “Let the little children come to me” (Mt. 19:14). Jesus’ family, like migrant families today, experienced the need to escape from life threatening dangers.
- Detention, even for a short amount of time, has been proven to be devastating to a child’s development, health and well-being. This proposed rule permitting indefinite detention is abusive and inhumane. The Flores settlement now ensures children are treated with “dignity, respect and special concern for their particular vulnerability as minors” but the proposed rule fails to meet those standards.
- There are proven, effective alternatives to detention—such as the Family Case Management System—that should be used instead because they are less harmful to a developing child and more cost effective.
- It is unacceptable for the administration to have the authority to certify that its own jails are safe for children. Detention facilities have been proven over and over to be dangerous to the health and well-being of vulnerable children.
- The proposed rule is an unnecessary burden on taxpayers. Alternatives to detention are proven to be effective and humane. The proposed rule is a needless cost and a poor and wasteful use of resources

**SUBMIT YOUR COMMENT ONLINE** at: <https://www.fwd.us/action/stop-family-detention-comment/>.

Note: You are able to cut and paste in your prepared and unique comment on this page!

**IF YOU PREFER TO MAIL A HARD COPY of your comment, use this address to send with postmark no later than Nov. 6** to: Debbie Seguin, Assistant Director Office of Policy, U.S. Immigration and Customs Enforcement Department of Homeland Security 500 12th Street SW Washington, DC 20536. You **MUST** also include your first and last name, and ICEB-2018-0002 on your comment.

**Note: PLEASE EMAIL to Rev. Sharon Stanley-Rea, Disciples Refugee & Immigration Ministries, at [sstanley@dhm.disciples.org](mailto:sstanley@dhm.disciples.org), to share if you have submitted a comment either online or via mail, as we are tracking faith comments!** Call Sharon at 202-957-7826 with any questions!  
See much more info. and additional resources about Flores protections at:  
<http://bit.ly/FamilyDetentionFloresProtections>