

June 17, 2017

United States Senate
Washington, D.C. 20510

RE: OPPOSITION TO NOMINATION OF LEE FRANCIS CISSNA FOR DIRECTOR OF U.S. CITIZENSHIP AND IMMIGRATION SERVICES

Dear Senator:

We, the 319 undersigned national, state, and local organizations that support and work with immigrants, write to oppose Lee Francis Cissna's nomination to the position of Director of U.S. Citizenship and Immigration Services (USCIS). As organizations whose missions include advocating for immigrant rights and working with immigrant communities, we strongly urge you to **vote no** on Mr. Cissna's political appointment.

As Director of USCIS, Mr. Cissna will advance President Donald Trump's cruel policies targeting immigrants. In his confirmation hearing, Mr. Cissna admitted to providing "technical assistance" on President Trump's executive orders on immigration. These horrific directives, which are currently being implemented by the U.S. Department of Homeland Security (DHS), have declared open season on immigrants, including legal immigrants, and seek to curtail important humanitarian initiatives and due process. Based on his previous statements and body of work, as part of the DHS's leadership team, Mr. Cissna will likely double down on these policies, which would tear apart immigrant families and communities. Indeed, a vote for Mr. Cissna is a vote for furthering President Trump's harmful anti-immigrant agenda.

Critically, Mr. Cissna simply does not have the necessary professional qualifications and managerial experience to serve as Director of USCIS. The Homeland Security Act of 2002 requires the USCIS Director to have "a minimum of 5 years of management experience."¹ Mr. Cissna, a long-time career official at DHS, lacks this critical experience. In Mr. Cissna's responses to questions for the record, he points to his relatively scant experience managing small teams of people and formulating agency policies as qualifying him for this position.² This lack of experience is unacceptable. USCIS is an agency charged with overseeing and administering our nation's immigration and humanitarian relief systems. USCIS employs over 17,000 people³ in over 200 offices worldwide and operates with a budget of over \$3.6 billion.⁴ At the height of his

¹ The Homeland Security Act of 2002, Pub. L. No. 107-296, 116 Stat. 2135 (2002).

² Sen. Dick Durbin, *Written Questions for Francis Cissna, Vishal Amin, and Stephen Boyd*, U.S. Senate Committee on the Judiciary (May 31, 2017), <https://www.judiciary.senate.gov/imo/media/doc/Cissna%20Responses%20to%20Durbin%20QFRs.pdf>.

³ U.S. Department of Homeland Security, *Budget-in-Brief Fiscal Year 2017 U.S. Department of Homeland Security*, 70, <https://www.dhs.gov/sites/default/files/publications/FY2017BIB.pdf>.

⁴ *Id.* at 10.

management experience, Mr. Cissna managed *only 14 individuals*.⁵ With this dearth of experience, Mr. Cissna would be charged with administering and reforming initiatives like USCIS' Transformation Program, a directive to digitize the agency's paper-based immigration forms, which was roundly criticized by the Government Accountability Office for problematic implementation, is years overdue, and is over a billion dollars over budget.⁶ USCIS, its various components, and its product lines require a leader with exceedingly strong management skills. Experience running small teams for limited periods of time and policy formulation is simply inadequate for the purposes of directing an agency such as USCIS. Consequently, Mr. Cissna is simply not qualified to lead USCIS.

Lastly, while at DHS, Mr. Cissna was detailed to Senator Chuck Grassley's office for two years, during which time he contributed to a slew of letters criticizing USCIS for implementing various humanitarian programs and initiatives. These include initiatives that reunited families and protected children facing violence, provided young people with Deferred Action for Childhood Arrivals (DACA) the opportunity to obtain travel documents, and assisted victims of crime, including those affected by domestic and sexual violence.⁷ While Mr. Cissna stated he would adhere to directives from the White House to continue DACA,⁸ Mr. Cissna will have incredible latitude in altering guidance governing DACA, including Frequently Asked Questions and the internal Standard Operating Procedures. Tellingly, anti-immigrant groups applauded the announcement of his nomination, including the Center for Immigration Studies,⁹ an organization classified as a hate group by the Southern Poverty Law Center.¹⁰

USCIS is a critical governmental agency that annually processes approximately six million immigration petitions and applications. USCIS considers and adjudicates the claims of individuals fleeing violence and persecution in their home countries, ensures that businesses have the workers they need to keep our nation's economic engine running, and welcomes our country's newest citizens. Consequently, USCIS must be led by an individual who has the necessary management experience and who has not expressed disapproval over the continued

⁵ Sen. Dick Durbin, *Written Questions for Francis Cissna, Vashal Amin, and Stephen Boyd*, U.S. Senate Committee on the Judiciary, 3 (May 31, 2017), <https://www.judiciary.senate.gov/imo/media/doc/Cissna%20Responses%20to%20Durbin%20QFRs.pdf>.

⁶ U.S. Gov't Accountability Office, GAO-16-467, *Immigration Benefits System: U.S. Citizenship and Immigration Services Can Improve Program Management* (2017), available at <http://www.gao.gov/products/GAO-16-467>.

⁷ Marcelo Rochabrun, *Trump's Immigration Pick Attacked Obama Programs in Ghost-Written Senate Letters*, ProPublica, May 23, 2017, <https://www.propublica.org/article/trumps-immigration-pick-attacked-obama-programs-in-ghost-written-senate>.

⁸ *DACA Requests Continue to Be Received and Processed, but Communities Should Be Cautious*, NCLR blog (June 13, 2017), <http://blog.nclr.org/2017/06/13/daca-requests-continue-received-processed-communities-cautious/> ("His nominee to head USCIS, Francis Cissna, stated in his confirmation hearing last month that if confirmed he would adhere to the President Trump's current position on DACA.").

⁹ @JessicaV_CIS, Twitter (Apr. 10, 2017, 11:49 AM) https://twitter.com/JessicaV_CIS/status/851507363768967168.

¹⁰ Heidi Beirich, *Hate Groups Like Center for Immigration Studies Want You to Believe They're Mainstream*, Southern Poverty Law Center (Mar. 23, 2017), <https://www.splcenter.org/hatewatch/2017/03/23/hate-groups-center-immigration-studies-want-you-believe-they%E2%80%99re-mainstream>.

implementation of family reunification and humanitarian initiatives. For these reasons, we strongly urge you to **vote no** on Lee Francis Cissna's nomination for Director of USCIS.

At the very least, we strongly urge you to issue and maintain a "hold" on Mr. Cissna's confirmation until Congress and the Administration develop and implement a permanent legislative solution to address the temporary nature of DACA.

Thank you for your consideration of this request. If you have any questions, please contact Jose Magaña-Salgado at imagana@ilrc.org or 202-777-8999.

Sincerely,

National Organizations

18MillionRising.org

Adjunct Justice

African American Ministers In Action (AAMIA)

Alianza Americas

American-Arab Anti-Discrimination Committee

Asian American Legal Defense and Education Fund (AALDEF)

Asian Americans Advancing Justice - AAJC

Asian Pacific American Labor Alliance, AFL-CIO (APALA)

Bend the Arc Jewish Action

Black Alliance for Just Immigration

Border Network for Human Rights

Casa Esperanza

Center for Gender & Refugee Studies

Center for New Community

Center for Popular Democracy (CPD)

Chapel of His Glory

CODEPINK

Community Initiatives for Visiting Immigrants in Confinement (CIVIC)

Detention Watch Network

Engage

Faith in Public Life

Familia: Trans Queer Liberation Movement

Farmworker Justice

Food Empowerment Project

Freedom Network USA

Grassroots Leadership

Hispanic Federation

Holy Spirit Missionary Sisters, USA - JPIC

Iglesia del Nazareno

Immigrant Legal Resource Center

International Organization for Adolescents (IOFA)

InterReligious Task Force on Central America and Colombia
Jewish Voice for Peace
Jobs With Justice
Justice Strategies
Kate Odonnell, OSF
Lambda Legal
Latino Victory Fund
LatinoJustice PRLDEF
League of United Latin American Citizens
Mi Familia Vota
Movement of Immigrants in America (Mia)
MPower Change
Muslim Public Affairs Council
NAACP
National Asian Pacific American Women's Forum
National Center for Lesbian Rights
National Center for Transgender Equality
National Council of Asian Pacific Americans (NCAPA)
National Council of Jewish Women
National Immigrant Justice Center
National Immigration Law Center
National Immigration Project of the NLG
National Iranian American Council (NIAC)
National Justice for Our Neighbors
National Korean American Service & Education Consortium (NAKASEC)
National Latina Institute for Reproductive Health
National Latina/o Psychological Association
National Network for Arab American Communities
National Network for Immigrant and Refugee Rights
National Organization for Women
National Partnership for New Americans (NPNA)
National Queer Asian Pacific Islander Alliance (NQAPIA)
OCA - Asian Pacific American Advocates
Our Revolution
Queer Detainee Empowerment Project
Queer Palestinian Empowerment Network
Redwood Justice Fund
Refugee and Immigrant Center for Education and Legal Services
San Antonio Region Justice For Our Neighbors
Sisters of Mercy South Central Community
Sisters of the Presentation of the Blessed Virgin Mary, New Windsor
Tennessee Immigrant and Refugee Rights Coalition
The Advocates for Human Rights
The Hampton Institute : A Working Class Think Tank

The Leadership Conference on Civil and Human Rights
U.S. Committee for Refugees and Immigrants
UFW Foundation
UnidosUS (formerly NCLR)
Unitarian Universalist Service Committee
United Child Care, Inc.
United We Dream
We Belong Together
Wyoming Coalition Against Domestic Violence and Sexual Assault

State and Local Organizations

(MILU) Mujeres Inmigrantes Luchando Unidas
AB 540 Ally Training Project, Inc.
ABRAZAR Inc.
Acting in Community Together in Organizing Northern Nevada (ACTIONN)
Adelante Mujeres
Advocates for Basic Legal Equality (ABLE)
African Advocacy Network
AFSC Colorado
Alabama Coalition for Immigrant Justice (ACIJ)
Alianza
American Citizens for Justice/Asian American Center for Justice
American Immigration Lawyers Association - Southern California Chapter
Aquinas Center
Arab American Civil Rights League
Arkansas United Community Coalition
Asian & Pacific Islander American Vote - Michigan
Asian Americans Advancing Justice - Atlanta
Asian Americans Advancing Justice-Los Angeles
Asian Law Alliance
Asian Pacific American Legal Resource Center
Asian Services In Action
Asylee Women Enterprise
Atlas: DIY
Bethany Immigration Services
Black Children's Institute of Tennessee
Brost Law Office
Cabrini Immigrant Services of NYC
Campbell Union High School District
CASA
Casa Familiar, Inc.
Casa Latina
Catholic Agency for Migration & Refugee Services
Catholic Charities of Trenton

Catholic Charities of West Tennessee
Catholic Charities Tompkins Tioga
Catholic Democrats of Nebraska
Causa Oregon
Center for NonProfit Legal Services
Central American Resource Center - Los Angeles
Central American Resource Center - Washington DC
Centro Comunitario CEUS
Centro de Servicios Para Campesinos de PCUN
Centro del Inmigrante, Inc.
Centro Hispano Milwaukee
Centro Laboral de Graton
Centro Latino Americano
Centro Legal de la Raza
Chesapeake Multicultural Resource Center
Chicago Religious Leadership Network on Latin America - CRLN
Chicano Federation of San Diego County
CHIRLA
Church of Our Saviour/La Iglesia de Nuestro Salvador, Episcopal
Church Women United in New York State
Cleveland Jobs with Justice
Coalicion de Derechos Humanos
Coalition for Humane Immigrant Rights (CHIRLA)
Coloradans For Immigrant Rights, a project of the American Friends Service Committee
Colorado
Colorado Immigrant Rights Coalition (CIRC)
Colorado People's Alliance (COPA)
Commuidades Unidas (CU) /Communities United
Congregation Kol Ami- Bear Creek United Methodist Interfaith Partnership
Consejo de Federaciones Mexicanas (COFEM)
CRLA Foundation
Crossroads of Georgetown
CT Working Families
Dolores Street Community Services
Dorcas International Institute of RI
DRUM - Desis Rising Up & Moving
East Bay Community Law Center
East Bay Sanctuary Covenant
El CENTRO de Igualdad y Derechos
Empire Justice Center
Empowering Communities Initiative (ECI)
Encuentro
End Domestic Abuse WI
Equal Justice Center

Equality California
Equality North Carolina
FACTR
Faith in the Valley
FIEL Houston Inc.
Filipino Advocates for Justice
Florida Immigrant Coalition, Inc.
FRESC: Good Jobs, Strong Communities
Friends of Broward Detainees
Friends of Miami-Dade Detainees
Georgia Association of Latino Elected Officials (GALEO)
Global Family Legal Services
Greater Rochester Coalition for Immigration Justice
Grupo de Apoyo e Integracion Hispanoamericano
HACES
Hana Center
Her Justice
Hispanic Interest Coalition of Alabama
Huerto de la Familia
Human Agenda
Human Rights Initiative of North Texas
ICE-Free Capital District
Idaho Community Action Network (ICAN)
IHM Sisters Justice, Peace and Sustainability Office
Illinois Coalition for Immigrant and Refugee Rights
Immanuel Fellowship: a Multicultural Church
Immigrant Defenders Law Center
Immigrant Justice Action Group, First Unitarian, Portland
Indivisible Indiana District 2
Inland Coalition for Immigrant Justice
Inland Empire - Immigrant Youth Collective
International Institute of Akron
International Institute of Buffalo
International Institute of the Bay Area
Iowa Citizens for Community Improvement (ICCI)
Jewish Voice for Peace Austin
Jolt
Junta for Progressive Action
Justice for all
Justice for Our Neighbors Southeastern Michigan
Justice for Our Neighbors West Michigan
Kentucky Coalition for Immigrant and Refugee Rights
Kids for College
Kitsap Immigrant Assistance Center

KIWA (Koreatown Immigrant Workers Alliance)
Korean Resource Center
La Casa de Amistad
La Raza Community Resource Center
La Red Health Center
Labor-Religion Coalition of NYS
Latin American Coalition
Latino Press
Latinos Unidos of the Hudson Valley
Legal Aid at Work
Libreria del Pueblo, Inc.
Long Island Wins
Los Angeles Center for Law and Justice
Lowcountry Immigration Coalition
Maine People's Alliance
Make the Road CT
Make the Road New Jersey
Make the Road NY (MRNY)
Make the Road PA
MAPS-AMEN (American Muslim Empowerment Network)
Massachusetts Immigrant and Refugee Advocacy Coalition
Massachusetts Law Reform Institute, Inc.
Maxwell Street Legal Clinic, a program of Kentucky Equal Justice Center
Memorial United Methodist Church
MetroWest Legal Services
MI ALMA
Michigan United
Mid-Peninsula Human Rights Coalition
Mission Graduates
Mississippi Immigrant Rights Alliance
Montana Organizing Project (MOP)
Mujeres Inmigrantes Luchando Unidas (MILU)
Mujeres Unidas y Activas
My Sisters' Place
Nebraska Appleseed
New Hampshire Alliance for Immigrant Rights-(NHAIR-MIRA)
New Voice Immigration Assistance Services
NH Conference UCC Immigration Working Group
NM Immigrant Law Center
North Carolina Justice Center
Northern Illinois Jobs with Justice
Northern Illinois Justice for Our Neighbors
Northern Manhattan Coalition for Immigrant Rights
Northwest Immigrant Rights Project

Oakland Law Collaborative
OCA - Greater Houston
OCCORD
Occupy Bergen County (New Jersey)
One Michigan for Immigrant Rights
OneAmerica
OutFront Minnesota
Pangea Legal Services
Partnership for the Advancement of New Americans
PASO (West Suburban Action Project)
Peace Over Violence
Pennsylvania Immigration and Citizenship Coalition
People's Action
Pineros y Campesinos Unidos del Noroeste (PCUN)
Pittsburgh LCLAA
Pomona Economic Opportunity Center
Progressive Leadership Alliance for Nevada (PLAN)
Project IRENE
Promise Arizona (PAZ)
Public Counsel
Reedley Social Services, Inc.
Reformed Church of Highland Park
Refugio del Rio Grande
Resilience Orange County
Rockland Immigration coalition
Rural and Migrant Ministry
San Diego Volunteer Lawyer Program, Inc.
ScholarshipsA-Z
Services, Immigrant Rights, and Education Network (SIREN)
Sisters and Brothers of Immigrants, Inc.
Sisters of St. Joseph Welcome Center
Skagit Immigrant Rights Council
Social Justice Collaborative
Somos Un Pueblo Unido (SOMOS)
South Asian Fund For Education, Scholarship And Training (SAFEST)
South Asian Network
South Texas Human Rights Center
Southern California Immigration Project
Southwest Organizing Project (SWOP)
St. Louis Inter-Faith Committee on Latin America (IFCLA)
Stephanie Chang, Michigan State Representative, District 6
Sunflower Community Action
Texas Organizing Project (TOP)
The Church of the Village

The Farmworker Association of Florida, Inc
The New York Immigration Coalition (NYIC)
TN Justice for Our Neighbors
U-Lead Athens
Underground Scholars
Undocumented Student Program
UNIRR
Unitarian Universalist Pennsylvania Legislative Advocacy Network (UUPLAN)
United African Organization
United for a New Economy (UNE)
University Leadership Initiative
UNO Immigration Ministry
UUPLAN-Unitarian Universalist PA Legislative Advocacy Network
Ventura County Clergy and Laity United for Economic Justice
Vida Legal Assistance, Inc.
Violence Intervention Program
Virginia Coalition for Immigrant Rights
Voces de la Frontera (VOCES)
Walking Faith Christian Church
Washington Defender Association's Immigration Project
WashingtonCAN!
Wayne Action for Racial Equality
WeCount!
Wilco Justice Alliance (Williamson County, TX)
Wind of the Spirit, Immigrant Resource Center
Women Watch Afrika, Inc.
Workers Defense Project