



WISCONSIN CATHOLIC CONFERENCE

November 5, 2018

Assistant Director Debbie Seguin
Office of Policy
U.S. Immigration and Customs Enforcement
Department of Homeland Security
500 12th Street SW
Washington, DC 20536

RE: DHS Docket No. ICEB-2018-0002, a Proposed Rules on Apprehension, Processing, Care, and Custody of Alien Minors and Unaccompanied Alien Children

Dear Ms. Seguin,

On behalf of the Catholic Bishops of Wisconsin, I am submitting the following comments on the proposed changes to the *Flores* Settlement Agreement (FSA) published by the Department of Homeland Security (DHS) and the Department of Health and Human Services (HHS) on September 7, 2018.

Our Catholic tradition recognizes the right of governments to regulate immigration for the sake of the common good. At the same time, our teaching holds that it is the duty of wealthy nations like ours to welcome foreigners who are searching for a better life and to respect their natural right to emigrate. This is especially true for families, when parents who seek not only to improve their own lives, but to avoid future harm to their children. Through years of litigation, our justice system established the FSA process, which protects the dignity of vulnerable immigrant children in federal custody. The FSA-established protocols ensure that children are treated humanely and not unjustly separated from family members.

However, the Administration's proposed rule change would eliminate important child-welfare protections. For example, it would permit the use of mechanical restraints on children and allow them to be detained with unrelated adults for long periods of time.

The proposed rule would also increase the use of federal family detention centers operated by Immigration and Customs Enforcement (ICE). Living in such detention centers has been found to be detrimental to one's physical and mental health. Interning thousands of immigrants, many of whom are women and children, in such facilities does not address the poverty and violence that plague Central America, nor will it deter those who have no better alternative from attempting to enter the country. However, it will greatly damage family stability, as well as the moral fabric of our nation and its reputation abroad as a beacon of freedom and hope.

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Simply put, the wealthiest nation on earth should not be interning thousands of poor and vulnerable families. Only humane and comprehensive immigration reform, including regulations that preserve the dignity of vulnerable immigrant children, will bring order to the border.

For all these reasons, we respectfully request that the Administration either retain the FSA as is, or rewrite the proposed rule in a way that respects its lawful and humane intent.

Sincerely,

Kim Vercauteren
Executive Director