



July 12, 2022

President Joseph R. Biden
The White House
1600 Pennsylvania Avenue NW
Washington, D.C. 20500

Alejandro Mayorkas
Secretary of Homeland Security
U.S. Department of Homeland Security
301 7th Street, SW
Washington, DC 2052

Antony Blinken
Secretary of State
U.S. Department of State
2201 C Street, NW
Washington, DC 20520

RECEIVED

By ESEC at 4:42 pm, Jul 12, 2022

RE: ORGANIZATIONS CALL FOR EXTENSION AND REDESIGNATION OF TEMPORARY PROTECTED STATUS FOR SYRIA

Dear President Biden, Secretary Mayorkas and Secretary Blinken,

The undersigned 112 state, local, and national immigrant, civil rights, legal and faith based organizations write to urge that Secretary Mayorkas extend and redesignate Temporary Protected Status (TPS) for Syria for an 18 month time period. We are also seeking a prompt publication of the necessary Federal Register Notice (FRN) of 180 day registration to ensure that those renewing or seeking redesignation have adequate time to apply.

There are currently 2,406 TPS cases of Syrians pending before United States Citizenship and Immigration Services (USCIS).¹ We urge the administration to take into account the extreme delay and disadvantage that applicants have faced in the past and waive their application fees (forms I-821 and I-765). In addition, we request the administration to provide dedicated funding for TPS backlogs to advance the USCIS's efforts to reduce backlogs and improve processing times.

The designation of TPS for Syria is set to expire on September 9, 2022, with the decision date coming up on July 31, 2022. More than 13.4 million Syrians have fled their country or are internally displaced, and 14.6 million are in dire need of humanitarian assistance.² Russia's war on Ukraine has exacerbated the humanitarian situation, with rising food insecurity and safety concerns. The United States recognized the civil war and the daily ongoing conflict as extraordinary conditions and granted Syria Temporary Protected Status in 2012.³ A designation or redesignation of TPS for Syria will protect 8,800 Syrians from returning to the conflict and

¹ "Number of Form I--821, Application for Temporary Protected, Status By Country of Designation, Quarter, and Case Status, October 1, 2021 - December 31, 2021,"

U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security (March 9, 2022), https://www.uscis.gov/sites/default/files/document/reports/I821_RADP_FY22_Q1.pdf.

² "Eleven years on, mounting challenges push many displaced Syrians to the brink," UNHCR, March 15, 2022,

<https://www.unhcr.org/en-us/news/briefing/2022/3/623055174/eleven-years-mounting-challenges-push-displaced-syrians-brink.html>.

³ "Extension and Redesignation of Syria for Temporary Protected Status," U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security, *Federal Register* 86 no. 2681-21 (March 19, 2021):14946,

<https://www.federalregister.gov/documents/2021/03/19/2021-05715/extension-and-redesignation-of-syria-for-temporary-protected-status>.

permit them to stay in the United States without fear of deportation.⁴ The ongoing war, violence and humanitarian crises, and the staggering human cost of the war with a death toll of over 350,200 people,⁵ makes the safe return of Syrians impossible.

I. Temporary Protected Status (TPS)

TPS allows people from a designated country to remain in the United States while conditions in their home country make safe return impossible. The Secretary of Homeland Security can designate a country for TPS if the country is experiencing ongoing armed conflict, natural disaster, or other extraordinary and temporary conditions. TPS allows its beneficiaries to stay in the United States during the designation period and receive work permits. It is a life-saving, blanket protection, especially for those who are ineligible for or who have been denied asylum.

II. Conditions that Merit TPS extension and redesignation

An 18-month extension is warranted because the ongoing armed conflict and extraordinary and temporary conditions supporting Syria's TPS designation remain. In 2021, Bashar al-Assad secured his fourth term as president. The U.S. Department of State reported that government forces use irregular warfare tactics, forced conscription of child soldiers, and chemical weapons.⁶ Widespread corruption, lack of political freedom, arbitrary arrests, brutal violence and killing of civilians have been reported. War crimes and crimes against humanity have been well documented throughout the conflict.⁷

If Syrian TPS recipients are forced to return to Syria, they risk forceful disappearance by all major actors in the country. Since 2011, at least 132,667 Syrian civilians have been arrested or forcibly displaced by Syrian regime forces, with 14,449 dying due to torture. For the first time, a 2021 trial in Koblenz, Germany used the principle of Universal Jurisdiction to find former Syrian government officials guilty for aiding and abetting crimes against humanity.⁸ However, in 2021, at least 1,271 people were killed, 2,218 were arbitrarily detained and at least 104 people died from torture.⁹ Since 2011, the Syrian regime has attacked healthcare centers more than 500 times, leaving the country unequipped to handle the COVID-19 pandemic.¹⁰ In 2021, attacks on medical infrastructure in Idlib continued, despite the 2020 Russian-Turkish ceasefire.¹¹

⁴ Donald Kerwin, José Pacas, and Robert Warren, *Ready to Stay: A Comprehensive Analysis of the US Foreign-Born Populations Eligible for Special Legal Status Programs and for Legalization under Pending Bills*, Center for Migration Studies, December 2021, <https://cmsny.org/wp-content/uploads/2021/12/Ready-to-Stay-A-Comprehensive-Analysis-of-the-US-Foreign-Born-Populations-Eligible-for-Special-Legal-Status-Programs-and-for-Legalization-under-Pending-Bills-CMS-Report-12-09-21-FINAL.pdf>.

⁵ "Syria: 10 years of war has left at least 350,000 dead," *UN News*, September 24, 2021, <https://news.un.org/en/story/2021/09/1101162>.

⁶ *2021 Country Reports on Human Rights Practices: Syria*, Bureau of Democracy, Human Rights, and Labor, U.S. Department of State, <https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/syria>.

⁷ "Since March 2011," Syrian Network for Human Rights, accessed July 7, 2022, <https://snhr.org/#1523098545619-e820e287-18bd>.

⁸ "State of Justice in Syria 2022," Syria Justice and Accountability Centre, March 10, 2022, <https://syriaaccountability.org/library-state-of-justice-in-syria-2022/>.

⁹ "Statistics of 2021," Syrian Network for Human Rights, accessed July 7, 2022, <https://snhr.org/#1523211656304-10d5a051-67df>.

¹⁰ Aysha A. Chowdhry et al., *No Choice: Attacks on Health as a Driver of Forced Displacement in Syria*, Georgetown Law Human Rights Institute, May 2021, https://www.law.georgetown.edu/human-rights-institute/wp-content/uploads/sites/7/2021/06/No-Choice-Report_web.pdf.

¹¹ *A Heavy Price to Pay: Attacks on Health Care Systems in Syria 2015-2021*, Syrian American Medical Society, May 2022,

A. Humanitarian crises

In 2022, the United Nations estimated 14.6 million people require humanitarian assistance, and 90% of Syrians live in poverty.¹² As of 2022, 12.4 million or 60% of Syria's population suffers from food insecurity, in part due to the depreciation and hyperinflation of the Syrian currency limiting access to necessary goods such as water, food, fuel and electricity. More than 70% of Syrian citizens lack access to clean water.¹³ The shortage of water due to conflict and environmental factors has led to the loss of agricultural livelihoods and resulted in poverty.¹⁴ Syria's worst drought in 70 years devastated the expected wheat harvest in 2021 by more than half.¹⁵ Russia's invasion of Ukraine has exacerbated a shortage of wheat exports to Syria. The United Nations' World Food Programme listed Syria as remaining a country of very high concern in their 2022 outlook.¹⁶ If U.N. Security Council Resolution 2585 is allowed to lapse in July, it would lead to the closure of the last remaining humanitarian aid border crossing in northwest Syria, leaving six million Syrians in Idlib without access to critical aid.¹⁷ Although only 55,000 infections and 3,000 deaths have been recorded since the start of the COVID-19 pandemic, it is believed the numbers are underreported and sprawling mass graves for victims indicates the numbers are much higher.¹⁸ Thousands of internally displaced people and detainees live in overcrowded conditions with little access to the sanitation measures necessary to stop the spread.¹⁹

III. Extension and Redesignation of TPS for Syria is in the United States' Best Interests

https://www.sams-usa.net/wp-content/uploads/2022/05/202205-SAMS-A-heavy-price-to-pay_Final_Version_En-1.pdf.

¹² "Fears grow for Syria amid rising violence, deepening humanitarian crisis," *UN News*, March 9, 2022, <https://news.un.org/en/story/2022/03/1113592>.

¹³ "Syria Country Report 2022," The BTI Transformation Index, February 2022, <https://bti-project.org/en/reports/country-report/SYR>.

¹⁴ "Conflict and Climate Change Ravage Syria's Agricultural Heartland," *The New York Times*, February 19, 2022, <https://www.nytimes.com/2022/02/19/world/middleeast/syria-drought-climate-food.html>.

¹⁵ "11 years of conflict in Syria: Threat of hunger has never been higher," Reliefweb, March 16, 2022, <https://reliefweb.int/report/syrian-arab-republic/11-years-conflict-syria-threat-hunger-has-never-been-higher>.

¹⁶ "Hunger Hotspots FAO-WFP early warnings on acute food insecurity June to September 2022 Outlook," World Food Programme, June 6, 2022, <https://www.wfp.org/publications/hunger-hotspots-fao-wfp-early-warnings-acute-food-insecurity-june-september-2022>.

¹⁷ "Why the UN Security Council Must Act to Save Lives and Secure Humanitarian Access for Millions in Need in Northern Syria," Physicians for Human Rights, May 31, 2022, <https://phr.org/our-work/resources/security-council-must-act-to-save-lives-and-secure-humanitarian-access-for-northern-syria/>.

¹⁸ "Reuters COVID-19 Tracker: Syria," Reuters, accessed July 8, 2022, <https://graphics.reuters.com/world-coronavirus-tracker-and-maps/countries-and-territories/syria/> <https://www.reuters.com/article/us-health-coronavirus-syria-capital/busy-damascus-cemetery-points-to-higher-pandemic-death-toll-in-syria-idUSKBN26S1VG>.

¹⁹ Carla E. Humud and Christopher M. Blanchard, *Armed Conflict in Syria: Overview and U.S. Response*, U.S. Library of Congress, Congressional Research Service, July 27, 2020, <https://crsreports.congress.gov/product/pdf/RL/RL33487>.

With the State Department’s announcement that “humanitarian needs in Syria and the region are greater than at any other time since the start of the conflict,”²⁰ it is imminent that the United States must renew TPS for Syrians.

TPS for Syria would not only be an appropriate use of the authority granted by Congress, but a critical tool to meet the goals of your administration to enhance our nation’s security and safety. USAID lists Syria as “the largest and most complex humanitarian crisis of our time, driving record levels of displacement.”²¹ U.S. Ambassador to the United Nations Security Council Linda Thomas-Greenfield recognized the cataclysmic situation: “As the humanitarian crisis reaches disturbing new heights, we must fully commit ourselves to supporting the needs of vulnerable Syrians.”²² The administration has pledged 800 million in humanitarian aid to Syria, the largest pledge made by the United States to date.²³ The Biden-Harris administration has already committed in its Plan for Partnership with the Arab American community to “protect vulnerable Syrians.”²⁴ An 18 month extension and redesignation of TPS for Syria is in line with US commitment to support vulnerable Syrians. Returning these nationals to the country poses a serious threat to their personal safety.

IV. Conclusion

Syria is in the middle of armed conflict, deteriorating country conditions and humanitarian crises. We urge the administration to immediately redesignate TPS for Syria for 18 months, publish timely Federal Register Notice (FRN), provide a minimum 180-day registration period, and launch a public information campaign to notify the impacted community of the decision. We urge the administration to take into account the extreme delay and disadvantage that applicants have faced and waive their application fees, and we request the administration to provide dedicated funding for TPS backlogs to advance the USCIS’s efforts to reduce backlogs and improve processing times. Finally, we request an engagement with the relevant decision makers at the DHS, USCIS, State, and the White House, to meet with our country and issue experts to discuss our request further. Please contact Hazem Rihawi, rihawi.h@arcsyria.org, Shannon Wilson, wilson.s@arcsyria.org or Lora Adams, lora@masadc.com with any questions.

Sincerely,

National

African Communities Together
Alianza Americas
America’s Voice
American Coalition for Syria

²⁰ “U.S. Announces Additional Humanitarian Assistance for the Syria Crisis Response,” U.S. Department of State, May 10, 2022, <https://www.state.gov/u-s-announces-additional-humanitarian-assistance-for-the-syria-crisis-response-2/>.

²¹ “Syria,” USAID, last updated February 28, 2022, <https://www.usaid.gov/syria>.

²² “Remarks by Ambassador Linda Thomas-Greenfield at a UN Security Council Briefing on the Humanitarian Situation in Syria,” U.S. Mission to the United Nations, May 20, 2022, <https://usun.usmission.gov/remarks-by-ambassador-linda-thomas-greenfield-at-a-un-security-council-briefing-on-the-humanitarian-situation-in-syria-3/>.

²³ “The United States Provides Nearly \$808 Million in Emergency Humanitarian Assistance for Syria,” USAID, May 10, 2022, <https://www.usaid.gov/news-information/press-releases/may-10-2022-united-states-provides-nearly-808-million-emergency-humanitarian>.

²⁴ “Joe Biden and The Arab American Community: A Plan for Partnership,” Biden Harris Campaign, 2020, <https://joebiden.com/joe-biden-and-the-arab-american-community-a-plan-for-partnership/>.

American Relief Coalition for Syria (ARCS)
Americans for a Free Syria
Asian Americans Advancing Justice | AAJC
Asian Pacific Institute on Gender-Based Violence
Asylum Seeker Advocacy Project (ASAP)
Big Heart Foundation
Bridges Faith Initiative
Catholic Legal Immigration Network, Inc. (CLINIC)
Church World Service
Communities United for Status & Protection (CUSP)
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Congregation of Sisters of St. Agnes
Disciples Immigration Legal Counsel
Disciples Peace Fellowship
Emgage Foundation Inc
Empowering Pacific Islander Communities
Evangelical Lutheran Church in America
Fellowship of Reconciliation (FOR-USA)
FWD.us
Hispanic Federation
Immigrant Legal Resource Center
InReach
International Refugee Assistance Project (IRAP)
InterReligious Task Force on Central America and Colombia
Jesuit Social Research Institute, Loyola University New Orleans
Kaylay's List PAC
Lutheran Immigration and Refugee Service
MedGlobal
Mercy-USA for Aid and Development
MPower Change
Multifaith Alliance for Syrian Refugees
NAHRA, Nicaraguan-American Human Rights Alliance
National Advocacy Center of the Sisters of the Good Shepherd
National Council of Churches
National Council of Jewish Women
National Employment Law Project
National Immigration Law Center
National Network for Arab American Communities (NNAAC)
National Partnership for New Americans
NuDay
Presente.org
Pro-justice
RAICES
Rochester, Minnesota Franciscan Sisters and Cojourners
Sisters of Charity Federation
Sisters of Charity, BVM
Sisters of Mercy of the Americas Justice Team
Sisters of St Joseph of Carondelet
Swasia Charity Foundation
Syria Faith Initiative
Syria Relief & Development

Syrian American Council
Syrian American Medical Society
Syrian Forum USA
The Campaign for Hong Kong
The Episcopal Church
The Syria Campaign
U.S. Committee for Refugees and Immigrants (USCRI)
Venezuelan American Caucus
We Are All USA
World Relief

State/Local

ACER. Inc
Ayuda
Boston University International Human Rights Clinic
Casa de Venezuela Orlando
Central American Resource Center of Northern CA - CARECEN SF
Centro Romero
Church of Our Saviour/La Iglesia de Nuestro Salvador
Connecticut Shoreline Indivisible
Dominican Sisters of Houston
Emerald Isle Immigration Center
Envision Freedom Fund
FEDECMI/Casas Michoacan
Greater Cleveland Immigrant Support Network
Immigrant Defenders Law Center
Immigrant Legal Advocacy Project
Immigrant Legal Center of Boulder County
Intercommunity Justice and Peace Center
International Institute of New England
Iowa Migrant Movement for Justice
Jewish Voice for Peace, Atlanta chapter
Just Neighbors Ministry
La Casa de Amistad
Latin American Coalition
Massachusetts Law Reform Institute
Michigan Immigrant Rights Center (MIRC)
MinKwon Center for Community Action
New Hampshire Conference United Church of Christ, Immigrant & Refugee Support Group
New York Immigration Coalition
Pennsylvania Council of Churches
Rian Immigrant Center
Seattle Immigrant Rights Action Group
Sisters of St. Francis of Perpetual Adoration Justice, Peace and Integrity of Creation
Commission
Sisters of St. Joseph of Carondelet, LA
Sisters of the Humility of Mary
Social Justice Coalition
Syrian Christians education committee
SyrianCommunityNetwork
The Advocates for Human Rights

The Legal Aid Society (New York)
The Legal Project
True Alliance Center Inc
Venezuelans and Immigrants Aid (VIA)
Wayne Action for Racial Equality
WESPAC Foundation, Inc.
Westchester Jewish Coalition for Immigration (WJCI)
Wilco Justice Alliance (Williamson County, TX)
Wind of the Spirit Immigrant Resource Center



August 17, 2022

Ramya Reddy
Managing Policy Counsel
MASA Group
ramya@masadc.com

Dear Ms. Reddy:

Thank you for your July 12, 2022 letter to the Department of Homeland Security (DHS) requesting an extension and redesignation of Syria for Temporary Protected Status (TPS). Secretary Mayorkas asked that I respond on his behalf.

I appreciate the concerns you have outlined regarding the situation in Syria and your interest in its extension and redesignation for TPS. DHS has closely monitored conditions in Syria and shares your concerns about the ongoing situation there. DHS is committed to administering its programs, including TPS, in an equitable manner and makes decisions regarding TPS designations after consultation with interagency partners and careful consideration of the circumstances of the country, pursuant to specific statutory criteria. *See* Immigration and Nationality Act §§ 244(b)(1) and 244(b)(3). As required by the statute, at least 60 days before the expiration of a foreign state's TPS designation or extension, the Secretary, after consultation with appropriate Government agencies, must review the conditions in the foreign state to determine whether the conditions for the TPS designation continue to be met. DHS will consult with the Department of State to explore whether to extend and/or to redesignate Syria for TPS.

Syria was initially designated for TPS on the basis of extraordinary and temporary conditions that prevented nationals of Syria from returning in safety. *See* Designation of Syrian Arab Republic for Temporary Protected Status, 77 FR 19026 (Mar. 29, 2012). Following the initial designation, TPS for Syria was extended and newly designated three times: (1) from October 1, 2013 to March 31, 2015, based on ongoing armed conflict and extraordinary and temporary conditions;¹ (2) from April 1, 2015 to September 30, 2016, based on ongoing armed conflict and extraordinary and temporary conditions;² and (3) from October 1, 2016 to March 31, 2018, based on ongoing armed conflict and extraordinary and temporary conditions.³ Thereafter, TPS for Syria was extended from April 1, 2018 to September 30, 2019, based on ongoing armed conflict and extraordinary and temporary conditions⁴ and October 1, 2019 to March 31, 2021, based on ongoing armed conflict and extraordinary and temporary conditions.⁵ Most recently,

¹ *See* Extension and Redesignation of Syria for Temporary Protected Status, 78 FR 36223 (June 16, 2013).

² *See* Extension and Redesignation of the Syrian Arab Republic for Temporary Protected Status, 80 FR 245, (Jan. 4, 2015).

³ *See* Extension and Redesignation of Syria for Temporary Protected Status, 81 FR 50533, (Jul. 31, 2016)

⁴ *See* Extension of the Designation of Syria for Temporary Protected Status, 83 FR 9329, (Mar. 4, 2018).

⁵ *See* Extension of the Designation of Syria for Temporary Protected Status, 84 FR 49751, (Sep. 22, 2019)

TPS for Syria was extended and redesignated from March 31, 2021 to September 30, 2022, based on ongoing armed conflict and extraordinary and temporary conditions.⁶

After consultation with our interagency agency partners, the Secretary has determined that country conditions in Syria remain such that an extension and redesignation of Syria for TPS is warranted. On July 29, 2022, the Secretary announced an extension and redesignation of Syria for TPS for 18 months effective October 1, 2022 through March 31, 2024 based on ongoing armed conflict and extraordinary and temporary conditions. Existing beneficiaries have been given a 60-day re-registration period from August 1, 2022 through September 30, 2022. The initial registration period, for first time registrants, began on August 1, 2022 and will remain in effect through March 31, 2024.

In addition to TPS, U.S. Citizenship and Immigration Services (USCIS) also offers support that may be available upon request to assist eligible Syrian nationals (or individuals without nationality who last habitually resided in Syria) and others affected by special situations, including the following:

- Change or extension of nonimmigrant status if currently in the United States, even if the request is filed after the authorized period of admission has expired;
- Expedited processing of requests for travel authorization documents;
- Expedited adjudication of requests for off-campus employment authorization for F-1 students experiencing severe economic hardship;
- Expedited adjudication of employment authorization applications, where appropriate;
- Assistance if applicants received a Request for Evidence or a Notice of Intent to Deny and were unable to appear for an interview, submit evidence, or respond in a timely manner because of the special situation; and
- Replacement of lost or damaged immigration or travel documents issued by USCIS, such as a Permanent Resident Card (Green Card).

More information on these options is available on our website at <https://www.uscis.gov/humanitarian/special-situations>.

Thank you again for your letter and interest in this important issue. DHS values the input of impacted and interested stakeholders. In addition to your letter, thank you for providing your input during the listening session regarding TPS for Syria that took place on July 19, 2022. Please share this response with the other organizations that cosigned your letter. Should you require any additional assistance, please do not hesitate to contact me.

Sincerely,



Ur M. Jaddou
Director

⁶ See Extension and Redesignation of Syria for Temporary Protected Status, 86 FR 14946, (Mar. 18, 2021).