

April 25, 2018

Thomas D. Homan  
Deputy Director and Senior Official Performing the Duties of the Director  
U.S. Immigration and Customs Enforcement  
500 12th St. SW  
Washington, D.C. 20536

Dear Deputy Director Homan:

As 58 number of faith-based organizations and 189 faith leaders we are writing to express our outrage and shock at the directive issued by the U.S. Immigration and Customs Enforcement (ICE) on March 29, 2018, eliminating the presumption that ICE should not detain pregnant women except in extraordinary circumstances and removing various reporting requirements regarding the treatment of pregnant women in detention. Our sacred scriptures remind us time and again those who are vulnerable and “the least of these” deserve our caring, our time, and our energy. We are deeply troubled by this policy change, which endangers the lives of pregnant women, subjecting them to harmful and prolonged periods of detention. Pregnant women should not be detained absent extraordinary circumstances. Together, we urge ICE to recognize the inherent value of every human and restore its August 2016 Memorandum on the Identification and Monitoring of Pregnant Detainees with the presumption of release.

We also believe it is essential that pregnant women be able to access critical health services and are acutely concerned that the health and safety of mother and baby are threatened by the conditions and stresses of unnecessary detention. The immigration detention system has been proven over and over again to be incapable of handling the needs of vulnerable populations, including and especially those with serious medical needs. Not only does this new ICE directive risk the health and safety of pregnant women, it removes critical reporting requirements for oversight of the detention system. For example, it removes all requirements for ICE to regularly re-evaluate pregnant women’s detention status. The ICE detention system needs more, not less, transparency and accountability.

These facilities were never designed to care for the specific needs of pregnant women and their detention has led to a severe health crisis – one that could have been avoided. A significant number of complaints have been filed with the Department of Homeland Security’s Office for Civil Rights and Civil Liberties (CRCL) and Office of Inspector General (OIG) that detail a number of instances in which due to inadequate access to care women have suffered miscarriages.<sup>1</sup> DHS Inspector General has said that the conditions in detention facilities “undermine the protection of detainees’ rights, their humane treatment, and the provision of a safe and healthy environment.”<sup>2</sup> Still more cases show that women in detention do not have access to prenatal care or information on nursing and infant care.<sup>3</sup> This change in policy will only lead to greater incidents of inadequate access to care that result in more senseless trauma for mothers, their babies and their families.

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<sup>1</sup> Increasing Numbers of Pregnant Women Facing Harm in Detention, Administrative Complaint filed with Office for Civil Rights and Civil Liberties, and the Office of the Inspector General, September 26, 2017, available at: [https://www.americanimmigrationcouncil.org/sites/default/files/general\\_litigation/complaint\\_increasing\\_numbers\\_of\\_pregnant\\_women\\_facing\\_harm\\_in\\_detention.pdf](https://www.americanimmigrationcouncil.org/sites/default/files/general_litigation/complaint_increasing_numbers_of_pregnant_women_facing_harm_in_detention.pdf)

<sup>2</sup> DHS OIG “Concerns about ICE Detainee Treatment and Care at Detention Facilities” <https://www.oig.dhs.gov/sites/default/files/assets/2017-12/OIG-18-32-Dec17.pdf>

<sup>3</sup> <https://www.womensrefugeecommission.org/images/zdocs/PUBLIC-VERSION-Complaint-to-CRCL-OIG-Pregnant-Women-in-ICE-Custody-11-13-17.pdf>

As people of faith we watch in disgust as women are again and again denied care for basic medical services and are stripped of even their basic human dignities. We believe that our Creator God gives each life value and purpose, regardless of immigration status, nationality, or creed.

- In July 2017, a 31-year old asylum seeker was arrested and placed in immigration detention. She was four months pregnant. After her arrest, she began to experience severe pain and bleeding. Despite the emergency nature of her medical needs, she reports that her pleas for assistance were ignored. Instead, she was transferred from a Border Patrol holding facility to an ICE detention center in southern California. She miscarried there.<sup>4</sup>
- In March 2017, a 23 year-old asylum seeker was detained at a U.S. port of entry. She was 12 weeks pregnant. She remained in ICE custody for three months, during which time she was transferred between facilities six times. At one point, she was made to endure a 23-hour round trip between facilities in New Mexico and Texas, which resulted in her hospitalization due to exhaustion and dehydration. She experienced nausea, vomiting, weakness, headaches, and abdominal pain during her detention. She did not receive sufficient prenatal vitamins or adequate medical attention, and when she requested a first floor dormitory area so that she would not have to climb the stairs repeatedly, her request was denied. After repeated requests that ICE ignored, she was finally released at the end of May 2017.<sup>5</sup>
- In April 2017, a 31-year old woman was detained in Tacoma, Washington after she appeared for an appointment with ICE. At the time, she was four weeks pregnant. While in detention, she experienced great anxiety and depression, after being told by ICE officials that she would be deported immediately. After three weeks of detention, she began bleeding early one morning and sought medical attention, but had to wait over an hour to be seen by a physician. Detention officers did not immediately respond to her requests for help even though she was bleeding profusely. Eventually she was taken to a local hospital, where a physician informed her that she had miscarried.<sup>6</sup>

We are not alone in our denunciation of the practice of detaining pregnant women and depriving them from the care they should receive. The American College of Obstetricians and Gynecologists (ACOG), the Mount Sinai Human Rights Program, the American Academy of Pediatrics (AAP), and the American Academy of Family Physicians (AAFP) have all stated their opposition by enumerating the significant physical and mental toll that imprisonment has on the health and safety of women and babies. These medical experts state: "All pregnant women and adolescents held in federal custody, regardless of immigration status, should have access to adequate, timely, evidence-based, and comprehensive health care. Pregnant immigrant women and adolescents should have access to high levels of care, care that is not available in these facilities."<sup>7</sup>

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<sup>4</sup> Increasing Numbers of Pregnant Women Facing Harm in Detention, Administrative Complaint filed with Office for Civil Rights and Civil Liberties, and the Office of the Inspector General, September 26, 2017, available at: [https://www.americanimmigrationcouncil.org/sites/default/files/general\\_litigation/complaint\\_increasing\\_numbers\\_of\\_pregnant\\_women\\_facing\\_harm\\_in\\_detention.pdf](https://www.americanimmigrationcouncil.org/sites/default/files/general_litigation/complaint_increasing_numbers_of_pregnant_women_facing_harm_in_detention.pdf)

<sup>5</sup> Id.

<sup>6</sup> Id.

<sup>7</sup> Letter from Medical Professionals to ICE Against Inhumane Detention Policies for Pregnant Women, March 29, 2018, available at: [http://www.aiala.org/infonet/medic-professionals-against-ice-detention-policies?utm\\_source=aiala.org&utm\\_medium=InfoNet%20Search](http://www.aiala.org/infonet/medic-professionals-against-ice-detention-policies?utm_source=aiala.org&utm_medium=InfoNet%20Search)

In the interest of upholding the human rights and dignity of this vulnerable population, we call on ICE to immediately restore the presumption of release to detention for pregnant women. Additionally, we urge ICE to develop compassionate systems to ensure that pregnant individuals are able to access quality healthcare and are not placed in positions of undue stress – including detention and shackling. DHS and ICE should institute stringent oversight practices to ensure the health and safety of pregnant women; comply with the Government Accountability Office's investigation and audit of the conditions for pregnant women in prisons and detention centers;<sup>8</sup> and investigate and rectify any complaint received that details mistreatment of individuals in detention facilities.

We see this great human rights crisis unfolding in front of our eyes and are deeply saddened. We pray as new policies are developed they are compassionate and thoughtful, respect the dignity of all people, and take into account each person's unique value and worth. Please end this inhumane process.

Sincerely,

**Faith Based Organizations**

Anti-Defamation League

Bon Secours Health System, Inc.

Christian Community Development Association

Church World Service

Congregation of Divine Providence of KY

Congregation of Sisters of St. Agnes

Crossing Borders - Dubuque

Disciples Refugee & Immigration Ministries

Dominican Sisters of Mission San Jose

Dominican Sisters of San Rafael

Dominican Sisters of Sinsinawa

East Texas Justice for Neighbors

Faith Action Network

Faith in Public Life

Franciscan Action Network

Franciscan Sisters of the Poor, US Area

Friends Committee on National Legislation

Holy Spirit Missionary Sisters, USA-JPIC

Hope Border Institute

HopeGateWay (United Methodist Church)

IHM Sisters Justice, Peace and Sustainability Office

Institute Justice Team, Sisters of Mercy of the Americas

Interfaith Alliance for Immigrant Justice

Interfaith Welcome Coalition

Justice, Peace and Reconciliation Commission, Priests of the Sacred Heart, US Province

Leadership Conference of Women Religious

Leadership Team of the Felician Sisters of North America

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<sup>8</sup><https://grijalva.house.gov/uploads/GAO%20Report%20Request%20on%20Pregnant%20Women%2011-09-17.pdf>

LUCHA Ministries, Inc.  
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Maine Council of Churches  
Mennonite Central Committee U.S. Washington Office  
Napa 1st United Methodist Church  
National Council of Jewish Women  
Neighborhood Ministries, Inc.  
NETWORK Lobby for Catholic Social Justice  
North American Climate, Conservation and Environment (NACCE)  
North Carolina Conference of the United Methodist Church  
North Carolina Council of Churches  
Office of Social Justice, Christian Reformed Church in North America  
Pax Christi USA  
Pennsylvania Council of Churches  
Project IRENE  
Pueblo Free Methodist Church  
Religious of the Sacred Heart of Mary, Western American Province  
Religious Sisters of Charity  
Ruth Battaglia  
Sisters of Charity of St. Vincent de Paul of New York  
Sisters of Mercy West Midwest Community  
Sisters of St. Francis of Philadelphia  
Solidarity  
South Street Ministries  
Surge Network  
The Reformed Church of Highland Park  
Tri-State Coalition for Responsible Investment  
Unitarian Universalists for Social Justice (UUSJ)  
United Church of Christ, Justice and Witness Ministries  
Welcome House Community Raleigh  
World Relief

### **Faith Leaders**

#### **Alaska**

Rev. Dr. Phil Campbell; Northern Light United Church

#### **Arizona**

Sister Patricia Ferrick; School Sisters of Notre Dame  
Elder Adam Estle; Orangewood Nazarene Church  
Pastor Don Benton; Sunrise UMC  
Rev. Vernon and Dennaë Pierre; Roosevelt Community Church  
Pastor Christopher Amaro; Redemption Church- West Mesa  
Sister Mary Virginia Leach; Dominican Sisters of Mission  
Rev. Teresa Jones; Sacred Space Tucson

Rev. James Fletcher; Woodfords Congregational Church UCC

### **California**

Rev. Jason Bense; Lutheran Church of our Redeemer  
Rev. Dr. Allison Tanner; Lakeshore Avenue Baptist Church  
Rev. Alene Campbell-Langdell; All Saints' Episcopal Church  
Rev. Rich Sander; Pueblo Free Methodist Church  
Rev. Frederick Morris; North Hills UMC Hispanic Mission  
Director Bethany Anderson; Camino Immigration Services  
Rev. Elizabeth Griswold; Parkside Community Church, UCC  
Rev. Jim Conn; United Methodist Santa Monica  
Rev. Mary Will; United Methodist Church (retired)  
Sister Jo'Ann De Quattro; Sisters of the Holy Names  
Dr. Lenore Dowling, IHM; Immaculate Heart Community  
Rev. Wilma Reichard; United Church of Christ Redwood City  
Sr. Judy McDonnell; Dominican Sisters of San Rafael  
Sr. Cheryl Holyk  
Sister Frances Mary Pierson; Dominican Sisters of Mission San Jose  
Dr. Robert & Erica Romero; J4R Church/Matthew 25  
Sister Kathleen Marie Raya; Dominican Sisters of Mission San Jose  
Sister Suzanne Marie Prows; Dominican Sisters of Mission San Jose  
Rev. David Farley, Director of Justice and compassion Ministries, Cal-Pac Conference; United Methodist Church  
Sister Sharon Dempsey; Dominican Sisters of Mission San Jose

### **Colorado**

Rev. David Warren; Westside Church Internacional  
Dr. Jeff Johnsen; Mile High Ministries  
Pastor Michael Philip; InnerCHANGE  
Sister Carmela Trujillo; Sisters of Saint Francis of Perpetual Adoration

### **Connecticut**

Sister Christine Stankiewicz; Felician-Franciscan Sisters  
Sr. Theresa Pietrzak; Felician Sisters  
Sister Joan Bernard; Sisters of St. Dominic  
Sister Francine Sousa; Felician Sisters

### **Florida**

Deacon Steven Beumer; St. John Evangelical Lutheran Church

### **Georgia**

Elder Dorothy Foster; Nacoochee Presbyterian Church

### **Illinois**

Rev. Cheryl Brumbaugh-Cayford; Highland Avenue Church of the Brethren  
Deacon Myrna Andersen; First Lutheran Church  
Sister Marcelline Koch; Dominican Sisters  
Sister Benita Coffey, Benedictine Sisters of Chicago  
Sister Maru Carr; Dominican Sisters  
Sister Kristine Vorenkamp, Sisters of the Living Word  
Sister Mary Ann Penner, IHM Sisters  
Rev. Kara Wagner Sherer; St. John's Episcopal Church  
Rev. Sherrie Lowly; Northbrook United Methodist Church

### **Indiana**

Sister Marge White; Sisters of St. Joseph  
Sister Ginger Downey; Our Lady of Victory Missionary Sisters

### **Kansas**

Rev. Lois Harder; Lorraine Avenue Mennonite Church  
Sister Judy Stephens; Sisters of St. Joseph  
Sister Christina Meyer; Sr. of St. Joseph

### **Kentucky**

Rev. Dr. Donna Morton; United Methodist Church  
Rev. Anne Vouga; St. Andrew's Episcopal Church  
Sr. Joetta Venneman; Sisters of Charity of Nazareth Congregational Leadership

### **Louisiana**

Sister Bernie Barrett; Sisters of the Holy Spirit and Mary Immaculate

### **Maine**

Rev. Cindy Maddox; First Congregational Church  
Rev. Allen Ewing-Merrill; HopeGateWay UMC  
Rev. Robert Moore; HopeGateWay UMC  
Rev. Dr. Myke Johnson; Allen Avenue Unitarian Universalist Church  
Rev. Donald Rudalevige; HopeGateWay UMC  
Rev. Jane Field; Faith Lutheran Church  
Rabbi Dr. Joshua Chasan, Rabbi Emeritus; Ohavi Zedek Synagogue  
Khenmo Konchok Drolma; Vajra Dakini Nunnery  
Rev. Dr. Jonathan Wright-Gray; Hope Gateway UMC  
Rev. Jeanette A. Good, Ph.D. Jeanette Good; State Street Church UCC  
Rev. Deborah Shipp HopeGateWay UMC  
Rev. Shantia Wright-Gray; Hope Gateway UMC  
Rev. Priscilla Dreyman; New England Conference of the United Methodist Church  
Rev. Sara Bartlett Alfred Parish Church  
Rev. Dr. Larry R. Kalajainen; Retired

Rev. Dr. Jodi Hayashida; First Universalist Church, Unitarian Universalist of Auburn  
Rev. Tamara Torres McGovern; Woodfords Congregational Church  
The Rev. Cn. Lawrence Weeks; Trinity & St. Peter's Episcopal Churches  
Rev. Mary Lee Wile; St. Paul's  
Pastor Marilyn Noble; Hope Gate Way UMC  
Rabbi Jared Saks; Congregation Bet Ha'am

### **Maryland**

Sister Mary Beth Hamm, SSJ; Sisters of St. Joseph of Chestnut Hill  
Dharmacarya Kaira Jewel Lingo; Order of Interbeing  
Rev. Dr. Raymond Moreland; Calvary United Methodist Church  
Rev. Julie Wilson; Centennial Memorial UMC  
Retired Rev. Patricia Hollinger; Church of the Brethren/Quaker  
Sister Elaine Davia; Sisters of Bon Secours  
Sister Linda Stilling; School sisters of Notre Dame  
Rev. Mary Garner; St. Paul's Episcopal Church  
Sister Marie Lucey; Sisters of St. Francis of Philadelphia  
Sister Maria Orlandini Sisters of St. Francis of Philadelphia  
Rev. Dr. Eliezer Valentin-Castanon; Trinity United Methodist Church

### **Massachusetts**

Cantor Vera Broekhuysen; Temple Emanu-El  
Leader Susan Teshu; American Ethical Union  
Chaplain Dr. William Houghton; Sacred Heart  
Rev. Heather Hinton; Second Congregational Church  
Rev. Charlotte Hendee; East Parish UMC  
Rev. Dr. Mary Jane O'Connor-Ropp; East Parish United Methodist Church

### **Michigan**

Rev. Dr. Kit Carlson; All Saints Episcopal Church  
Rev. Robert Langseth  
Rev. David Morton; Chapel Hill United Methodist  
Sr. Rosemarie Abate; Sisters, Home Visitors of Mary  
James Hug; Society of Jesus  
Sister Nancy Jamroz; Felician Sisters of North America  
Sister Mary Cynthia Ann Machlik; CSSF

### **Minnesota**

Rev. Mary Kay Sauter Retired  
Diane Haines, Chair of the MN Conference United Church of Christ Immigration Team;  
Mayflower UCC  
Rev. Lauren Davis; Our Saviors Lutheran  
Rev. Lindsay Louise Biddle; Presbyterian Church (U.S.A.)  
Ms. Mary Kozmik; St Paul's Monastery

### **Missouri**

Sister Carp Boschert; Sisters of the Most Precious Blood of O'Fallon  
Sister Anna Marie Reha; School Sister of Notre Dame  
Sister Danielle Bonetti; Sisters of St. Joseph of Carondelet  
Sister Martha Jaegers; Catholic  
Sister Mary Jo Heman, OP; Dominican Congregation of Sparkill

### **Nebraska**

Sister Kathleen Erickson; Sisters of Mercy West Midwest Community  
CLM Sandy Sypherd; United Methodist Church

### **New Hampshire**

Ms. Nancy Pape; NHCUCC Immigrant and Refugee Support Group

### **New Jersey**

Dr. Joseph Chuman; Ethical Culture Society  
Rev. Martha Gallahue; United Religions Initiative  
Rev. Seth Kaper-Dale; The Reformed Church of Highland Park  
Sister Angelica Smialowicz; Felician Sisters of North America

### **New York**

Bro. Jerry Rivers; Church of Christ  
Rev. Dr. Allison Moore; St. Barnabas Episcopal  
Sister Susanne Lachapelle  
Rev. Merle Showers; University United Methodist Church  
Pastor Christopher Hooper; First Evangelical Free Church  
Rev. John Long; First Presbyterian Church  
Elder Maria Studer; First Presbyterian Church of Levittown  
Rev. Taryn Mattice; Protestant Cooperative Ministry at Cornell University  
Father Bill Cooper; St. Thomas Church  
Clergy Leader Emerita Lisel Burns; Brooklyn Society for Ethical Culture  
Sister Nancy Fackner CSJ; Sisters of St Joseph Brentwood  
Sister Janetta McAlevey; Sisters of St. Dominic  
Sister Kathleen O'Connor; Dominican Sisters  
Sister Carol De Angelo; Sisters of Charity of St. Vincent de Paul of New York  
Sister Grace Hogan; Dominican of Sparkill  
Sister M. Jean Agnes Geraghty, O.P.; Sisters of St. Dominic  
Sister Lorraine Leibold; Sisters of St. Dominic  
Sister Elaine Jahrsdoerfer OP; Dominican Sisters of Amityville  
Sister Mary Louis Rustowicz; Felician Sisters (CSSF)  
Rabbi Leah Berkowitz; Vassar Temple

### **North Carolina**

Rev. Ismael Ruiz-Millan City Well UMC  
Rev. Christine Payden-Travers, Retired Episcopal Priest  
Mrs. Joy McConnell, Ethical Humanist Society of Asheville  
Rev. Jaye White; Haymount UMC  
Rev. Laura Beach; Boone United Methodist Church  
Rev. Dr. David Ratke; Lenoir-Rhyne University  
Deacon Dr. Mindy Makant; Lenoir-Rhyne University

### **Ohio**

Rev. Dr. John C. Dorhauer; General Minister and President of the United Church of Christ  
Sister Patricia Corbett; Congregation of ST. Joseph  
Sister Sheila Marie Tobbe; Ursuline Sisters of Cleveland  
Rabbi Jessica Shimberg; the Little Minyan Kehilah  
Ms. Clare Hoesl; St. Monica/St. George  
Rev. Dr. Suzanne Allen; United Methodist  
Rev. Bryson Davis; Front Porch Fellowship  
Rev. Derrick K. Holmes; Second Baptist Church

### **Oregon**

Rev. Dave Bean; Pioneer UMC

### **Pennsylvania**

Rev. Ross Carmichael; St. Andrew Lutheran Church  
Rev. Canon Maria Tjeltveit; Episcopal Church of the Mediator  
Rev. Sharon Williams; Nueva Vida Norristown New Life  
Sr., MD Patricia Lowery; Medical Mission Sister  
Sister Miriam Eileen Murray; Sisters of St. Francis of Philadelphia  
Sister Kate O'Donnell; Sisters of St. Francis of Philadelphia Justice, Peace and Integrity for Creation Committee  
Rev. Sandra Strauss; Market Square Presbyterian Church  
Rev. Sue Wagner Fields; Elizabethtown Church of the Brethren  
Sister Mary Faith Balawejder  
Sr. Danat Brysch; Felician Sisters  
Sister Frances Murray; Sisters of St. Francis of Philadelphia  
Sister Suzanne Susany; Sisters of St. Francis of the Neumann Communities  
Sister Mary Jessica Terek; Felician Sisters of North America

### **Rhode Island**

Sister Mary Pendergast; Sisters of Mercy

### **South Carolina**

Rev. Blake Hart; Cooperative Baptist Fellowship

### **Texas**

Sister Ceil Roeger; Dominican Sisters of Houston  
Dr. Monty Lynn; Highland Church of Christ  
Sister Sharon Altendorf; Union of Sisters of the Presentation of the BVM US Province  
Rev. MaryLo, Dillion UMCC  
Rev. Dr. Paul Ziese; MacArthur Park Lutheran Church  
Sister JT Dwyer; Daughters of Charity  
Sister Dorothy Moczygemba; Felician Sisters  
Rev. Dr. Karen Jones; Asbury United Methodist Church  
Sister Rose Quilter; Society of the Sacred Heart of Jesus

### **Vermont**

The Venerable Catherine Cooke; Cathedral Church of St. Paul

### **Virginia**

Sister Margaret McCabe; Daughters of Wisdom  
Dr. Sue Smith; Cooperative Baptist Fellowship

### **Washington D.C.**

Kay Gilley St John's Lafayette Square  
Pastor Lisa Watson; Christ City Church  
Rev. Dr. Sharon Stanley-Rea; National City Christian Church  
Rev. Matthew Watson; Christ City Church  
Ms. Sandy Sorensen, Director; United Church of Christ, Washington, DC Office

### **West Virginia**

Sister Carmella Campione; Congregation of Saint Joseph Wheeling

### **Wisconsin**

Provincial Superior Pat Cormack; Sisters of Mercy of the Holy Cross  
Sr. Linda Songy; Sisters of Mercy of the Holy Cross  
Sister Ramona Dombrowski; Felician Sisters