



The Honorable Alejandro Mayorkas  
Secretary of Homeland Security  
Washington, DC 20528

Monday, June 3, 2024

Dear Secretary Mayorkas:

We represent 75 groups, advocating for refugees and immigrants and advancing civil rights in the United States. We write regarding your [December 2021 commitment](#) on behalf of the Department of Homeland Security (DHS) to address the legal status of stateless people in the United States, and specifically, to raise our concerns that Immigration and Customs Enforcement (ICE) has failed to implement that commitment.

We commend the actions of the U.S. Citizenship and Immigration Services (USCIS) to implement this commitment. These include the August 2023 [USCIS Policy Manual](#) updates, which adopt the international definition of statelessness, addressing the legal needs of stateless people, and allow USCIS officers to consider statelessness as a positive factor in discretionary adjudications.

ICE, however, has taken no such steps, even though, in the absence of legislation, many of the hardships that stateless people experience most acutely can only be addressed by ICE. We echo the recommendations that United Stateless made in its May 16, 2024, letter. We urge ICE to implement the DHS-wide commitment to protect stateless individuals, including by:

- 1) Adopting the international definition of statelessness, as USCIS has already done: a person who is not considered as a national by any State under the operation of its law.
- 2) Train relevant ICE officers to recognize indicators of statelessness.
- 3) Ensure that statelessness is considered as a positive factor in discretionary consideration in situations where ICE officials have jurisdiction.
- 4) Address extended detention and onerous orders of supervision.
- 5) Address inadmissibility grounds under INA § 212(a)(6)(A)(i).
- 6) Collect data on stateless individuals.

Sincerely,  
United Stateless

[other orgs below in alphabetical order]

Abdoul, MAURITANIAN COMMUNITY LEADER  
Adoptee Rights Law Center  
Adoptees United Inc.  
African Advocacy Network  
African Human Rights Coalition  
Al Otro Lado  
Alianza Americas  
Alight  
American Friends Service Committee (AFSC)  
Asian Americans United  
Asian Counseling and Referral Service  
Bhutanese Community Association of Pittsburgh (BCAP)  
Black Alliance for Just Immigration  
California Immigrant Youth Justice Alliance  
CASA  
Casa de la Cultura  
Central American Resource Center- CARECEN- of California  
Center for Migration Studies  
Center for Victims of Torture  
Church World Service  
Clergy and Laity United for Economic Justice  
Coalición de Derechos Humanos  
Comunidad SOL  
Comunidad SOL-Ohio  
Connecticut Shoreline Indivisible  
COOLJC Region 8 SJEREC  
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces  
East Bay Refugee and Immigrant Forum  
Families For Freedom  
Florence Immigrant & Refugee Rights Project  
Franciscan Action Network  
Free Migration Project  
H-CAN Immigration and Refugees Action Group  
HIAS Pennsylvania  
Human Rights First  
Human Rights Initiative of North Texas  
Immigrant Defenders Law Center  
Immigrant Legal Resource Center

Immigration Hub  
Immigration Services and Legal Advocacy  
Illinois Coalition for Immigrant and Refugee Rights  
Inter-Faith Committee on Latin America (IFCLA)  
InterReligious Task Force on Central America  
International Refugee Assistance Project (IRAP)  
Justice at Work Pennsylvania  
Justice in Motion  
Louisiana Organization for Refugees and Immigrants - LORI  
Maine Immigrant Rights Coalition  
Maine Immigrants' Rights Coalition  
Miami Valley Immigration Coalition (Ohio)  
Motivation Motivates  
National Advocacy Center of the Sisters of the Good Shepherd  
National Immigrant Justice Center  
National Immigration Project (NIPNLG)  
National Korean American Service & Education Consortium (NAKASEC)  
Never Again Action  
New York Law School Asylum Clinic  
NorCal Resist  
Oasis Legal Services  
Ohio Immigrant Alliance  
OPAWL - Building AAPI Feminist Leadership  
Pennsylvania Immigrant and Citizenship Coalition  
Project Immigration Justice for Palestinians (Project IJP)  
Refugee Congress  
Refugee Council USA  
Rocky Mountain Immigrant Advocacy Network  
Safe Harbor Clinic  
SEE (Social Eco Education)  
The Immigration Project  
Transformations CDC  
USAHello  
Venezuelans and Immigrants Aid (VIA)  
Voices for Utah Children  
We Are All America  
World Relief

CC:

Ur Jaddou, Director, U.S. Citizenship and Immigration Services

Patrick J. Lechleitner, Deputy Director and Senior Official Performing the Duties of the Director,  
U.S. Immigration and Customs Enforcement

Felicia Escobar Carillo, Chief of Staff, U.S. Citizenship and Immigration Services

Deborah Fleischaker, Executive Secretary, Department of Homeland Security

Cass Sunstein, Senior Counselor, Department of Homeland Security

Charanya Krishnaswami, Counselor, Office of the Secretary, Department of Homeland Security

Michael D. Lumpkin, Chief of Staff, U.S. Immigration and Customs Enforcement

Jon Hoisaeter, Deputy Representative, UNHCR

Anna Greene, Senior Protection Officer, UNHCR