

August 24, 2020

Acting Secretary Chad Wolf
Department of Homeland Security (DHS)
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Washington, D.C. 20016
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Cc: Deputy Director of Policy Joseph B. Edlow
United States Citizenship and Immigration Services, DHS
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RE: ORGANIZATIONS REQUEST 18-MONTH EXTENSION AND REDESIGNATION OF TEMPORARY PROTECTED STATUS FOR SOUTH SUDAN

Dear Acting Secretary Wolf:

We, the over 210 local, regional, national, and international organizations, call on you to extend for 18 months and redesignate Temporary Protected Status, or TPS, for South Sudan to protect the 84 current South Sudanese TPS holders¹ and their families, as well as recent arrivals who would benefit from redesignation. Our request is rooted in current country conditions and U.S. national security interests, especially in light of COVID-19.

I. Current country conditions necessitate 18-month extension and redesignation:

An 18-month extension and redesignation of TPS for South Sudan is warranted as the conditions that existed for the 2018 extension of TPS for South Sudan remain, and, in some cases, have worsened. Civilian casualties, human rights abuses, war crimes and crimes against humanity continue in South Sudan. 4.8 million people are currently in need of protection.² Since civil war broke out in 2013, at least 400,000 lives have been lost.³ In the most recent comprehensive data available from the UN mission in South Sudan, nearly 700 civilian deaths, more than 450 injuries, and 600 abductions were reported in the first quarter of 2020 alone.⁴

The use of child soldiers is also ongoing in the conflict, with UNICEF identifying at least 19,000 as of 2019.⁵ Clashes among ethnic groups persist, and in late May 2020, hundreds of civilians

¹ See 84 Fed. Reg. 13688 (April 5, 2019), www.federalregister.gov/documents/2019/04/05/2019-06746/extension-of-the-designation-of-south-sudan-for-temporary-protected-status.

² Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (NOV. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

³ Max Bearak, *Hundreds killed, villages destroyed in massacres undermining South Sudan's peace deal*, THE WASHINGTON POST (May 28, 2020), www.washingtonpost.com/world/africa/south-sudan-violence-peace-deal/2020/05/27/3b28491a-9f8a-11ea-be06-af5514ee0385_story.html.

⁴ *Victims of intercommunal violence in South Sudan deserve 'justice, truth and reparations'*: Bachelet, UN NEWS (May 22, 2020), <https://news.un.org/en/story/2020/05/1064792>.

⁵ *South Sudan: Evidence of violations and illicit concealment of arms must spur UN to renew arms embargo*, AMNESTY INTERNATIONAL (April 30, 2020), www.amnesty.org/en/latest/news/2020/04/south-sudan-evidence-of-violations-and-illicit-concealment-of-arms-must-spur-un-to-renew-arms-embargo/.

were killed when a militarized group entered a village with machine guns.⁶ Three aid workers from Doctors Without Borders and the U.N. were killed in the attack.⁷ In fact, conditions in South Sudan are so extreme that humanitarian organizations including Catholic Relief Services, International Committee of the Red Cross, Médecins Sans Frontières, Oxfam International have stopped relief services in Jonglei, South Sudan. Civilian deaths at the hands of government forces were recorded in the capital city, Juba, in June 2020.⁸ In July 2020, USAID reported ongoing conflict and displacement across the entire country.⁹ The report documented at least 46,000 newly displaced people across several regions.¹⁰ Rape and sexual violence used as weapon of war continues in South Sudan. In 2019, there were 224 documented cases of conflict-related sexual violence affecting 133 women, 66 girls, 19 men and 6 boys.¹¹ 65 cases were recorded in the first quarter of 2020 alone.¹² Cases of sexual violence continue to be underreported.¹³

In addition to armed conflict in South Sudan, an 18 month extension and redesignation of TPS is needed to protect recent entrants from the deepening humanitarian crisis. At least 7.5 million people are in need of humanitarian assistance in South Sudan,¹⁴ up from 7.1 million in 2019.¹⁵ At least 1.6 million are internally displaced from conflict and other factors.¹⁶ South Sudan is hosting approximately 300,000 refugees from neighboring countries as well as 600,000 spontaneous returnees.¹⁷ 2.3 million South Sudanese people have been driven over the border, an increase from the previous year, and live as refugees in surrounding countries.¹⁸

The Famine Early Warning System Network (FEWS) predicts food insecurity will worsen over 2020 due to conflict from complete depletion of cereal stocks from the previous harvest (which were affected by climate extremes among other factors) and desert locust damage to crops, to COVID-19.¹⁹ FEWS²⁰ predicts more than 6.5 million people will need emergency food assistance by September 2020.²⁰ More than 50 percent of the population is facing crisis level food shortages and if movement becomes more restricted in the country due to COVID 19,

⁶ Max Bearak, *Hundreds killed, villages destroyed in massacres undermining South Sudan's peace deal*, THE WASHINGTON POST (May 28, 2020), www.washingtonpost.com/world/africa/south-sudan-violence-peace-deal/2020/05/27/3b28491a-9f8a-11ea-be06-af5514ee0385_story.html.

⁷ *Id.*

⁸ *South Sudan: Soldiers Kill Civilians in Land Dispute*, Human Rights Watch (June 9, 2020), www.hrw.org/news/2020/06/09/south-sudan-soldiers-kill-civilians-land-dispute.

⁹ South Sudan Crisis – Fact Sheet # 8, USAID (July 2, 2020),

www.usaid.gov/sites/default/files/documents/1866/07.02.20_-_USAID-DCHA_South_Sudan_Crisis_Fact_Sheet_8.pdf.

¹⁰ *Id.*

¹¹ South Sudan, OFFICE OF THE SPECIAL REPRESENTATIVE OF THE SECRETARY GENERAL ON SEXUAL VIOLENCE IN CONFLICT, (June 3, 2020), www.un.org/sexualviolenceinconflict/countries/south-sudan/.

¹² *Id.*

¹³ *Id.*

¹⁴ *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Nov. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

¹⁵ *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2019*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Dec. 2018), www.humanitarianresponse.info/en/operations/south-sudan/document/south-sudan-humanitarian-needs-overview-2019.

¹⁶ South Sudan Crisis – Fact Sheet # 8, USAID (July 2, 2020),

www.usaid.gov/sites/default/files/documents/1866/07.02.20_-_USAID-DCHA_South_Sudan_Crisis_Fact_Sheet_8.pdf.

¹⁷ *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Nov. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

¹⁸ *Id.*; *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2019*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Dec. 2018), www.humanitarianresponse.info/en/operations/south-sudan/document/south-sudan-humanitarian-needs-overview-2019.

¹⁹ *South Sudan: Poor macroeconomic conditions and COVID-19 to escalate Emergency (IPC Phase 4) outcomes by mid-2020*, FAMINE EARLY WARNING SYSTEMS NETWORK (April 2020), <https://fews.net/east-africa/south-sudan/food-security-outlook-update/may-2020>.

²⁰ *Id.*

widespread famine is possible.²¹ The number of children in South Sudan facing acute malnutrition rose from 13 in 2018 to 16 percent in 2019.²² More than 1.3 million children under the age of five are projected to be acutely malnourished in 2020.²³ Eighty percent of South Sudanese are living below the absolute poverty line, greatly contributing to the food and other humanitarian crises.²⁴ Ongoing extreme cycles of drought and flooding are a major issue, destroying food sources and affecting delivery of aid.²⁵

Access to clean water and sanitation remains limited in South Sudan, with more than 5.5 million people in need of assistance.²⁶ Only 60 percent of nondisplaced people and 45 percent of displaced people have access to clean water and sanitation.²⁷ Nearly three quarters of households report family members suffering from waterborne or vector-borne illnesses.²⁸

South Sudan has little health care infrastructure due to ongoing conflict and economic collapse, making both extension and redesignation even more dire given the COVID-19 pandemic.²⁹ At least 3.6 million people are currently in need of health care services.³⁰ Due to ongoing conflict and economic collapse, less than half of South Sudan's healthcare facilities are fully functioning.³¹ The country only has 24 ICU beds and 4 ventilators for a population of 11.7 million people.³² There is only one laboratory dedicated to coronavirus testing and only one permanent infectious disease unit in the entire country.³³ As of late June, there were 2,000 known cases of COVID-19 and 35 deaths.³⁴ While monitoring along South Sudan's shared border with the Democratic Republic of Congo has so far prevented the spread of that country's Ebola outbreak, risks remain.³⁵ A new Ebola outbreak was announced in DRC in June 2020.³⁶ Outbreaks of other infectious diseases continue across the country including hepatitis E, yellow fever, malaria, acute respiratory infection and acute watery diarrhea.³⁷

²¹ *Id.*

²² *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Nov. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

²³ *Id.*

²⁴ *Id.*

²⁵ *South Sudan: Floods - Operations Update, Emergency appeal*, INTERNATIONAL FEDERATION OF RED CROSS AND RED CRESCENT SOCIETIES (April 28, 2020), <https://reliefweb.int/report/south-sudan/south-sudan-floods-operations-update-emergency-appeal-n-mdrss009-28-april-2020>.

²⁶ *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Nov. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

²⁷ *Id.*

²⁸ *Id.*

²⁹ *5 crisis zones threatened by a coronavirus "double emergency"*, INTERNATIONAL RESCUE COMMITTEE (April 9, 2020), www.rescue.org/article/5-crisis-zones-threatened-coronavirus-double-emergency.

³⁰ *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Nov. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

³¹ *5 crisis zones threatened by a coronavirus "double emergency"*, INTERNATIONAL RESCUE COMMITTEE (April 9, 2020), www.rescue.org/article/5-crisis-zones-threatened-coronavirus-double-emergency.

³² *Id.*

³³ Maura Ajak and Cara Anna, *Virus outbreak could spin 'out of control' in South Sudan*, AP (June 22, 2020), <https://apnews.com/265a7d7cbb6bb6ec29f4bcb1c69e739d>.

³⁴ *Devastating South Sudan coronavirus deaths, a tragedy that can be prevented*, Security Council hears, UN NEWS (June 23, 2020), <https://news.un.org/en/story/2020/06/1066952>.

³⁵ *Ebola Virus Disease Preparedness Report*, IOM (May 2020), <https://reliefweb.int/sites/reliefweb.int/files/resources/IOM%20South%20Sudan%20%20EVD%20Preparedness%20Monthly%20Update%20May%202020.pdf>.

³⁶ *New Ebola outbreak detected in northwest Democratic Republic of the Congo; WHO surge team supporting the response*, WORLD HEALTH ORGANIZATION (June 1, 2020), www.who.int/news-room/detail/01-06-2020-new-ebola-outbreak-detected-in-northwest-democratic-republic-of-the-congo-who-surge-team-supporting-the-response.

³⁷ *Humanitarian Needs Overview: South Sudan, Humanitarian Program Cycle 2020*, UN OFFICE FOR THE COORDINATION OF HUMAN AFFAIRS (Nov. 2019), <https://reliefweb.int/report/south-sudan/south-sudan-humanitarian-needs-overview-2020-november-2019>.

II. Extension and redesignation of TPS for South Sudan is in line with humanitarian values and U.S. national interest:

By protecting people's lives and granting work authorization, TPS serves key national and regional security interests, advances moral and strategic U.S. engagement with the international community and provides other benefits to the United States. The United States has made commitments to help restore stability in South Sudan and to assist those that have been impacted by the protracted violence.³⁸ TPS is a major piece of that commitment.

In general, TPS holders make great contributions to the U.S. economy, working in key industries such as construction and home health care and paying into the U.S. GDP, Social Security and Medicare.³⁹ Many TPS holders are essential workers, serving on the frontlines of the COVID-19 crisis.⁴⁰ TPS holders also send vital remittances to family and friends in countries of origin, providing unofficial foreign aid that allows people to meet their basic needs and helps stabilize countries and regions.⁴¹ In South Sudan, remittances make up 34 percent of the country's GDP.⁴² Remittances to African nations are expected to plummet by 25 percent this year, due to COVID-19.⁴³ Extension and redesignation of TPS for South Sudan would help keep life-saving financial support flowing into the country.

In line with the above policy principles and using the law as Congress intended, we urge you to grant the maximum protection possible through an 18-month extension and redesignation of TPS for South Sudan.

Sincerely,

International Organizations

American Friends Service Committee

CARE USA

Carmelite Sisters, Vedruna

Concern Worldwide US

Dominican Sisters of Mission San Jose

Frontier Fellowship

Oxfam America

United Sikhs

³⁸ *U.S. Relations With South Sudan*, U.S. DEPARTMENT OF STATE (Aug. 10, 2018), www.state.gov/r/pa/ei/bgn/171718.htm.

³⁹ Robert Warren and Donald Kerwin, *A Statistical and Demographic Profile of the US Temporary Protected Status Populations from El Salvador, Honduras, and Haiti*, JOURNAL ON MIGRATION AND HUMAN SECURITY, Vol. 5 No. 3 (2017),

<https://cmsny.org/publications/jmhs-tps-elsalvador-honduras-haiti/>; Amanda Baran, Jose Magana-Salgado and Tom K. Wong, *Economic Contributions by Salvadoran, Honduran, and Haitian TPS Holders*, IMMIGRANT LEGAL RESOURCE CENTER (April 2017), www.ilrc.org/report-tps-economic-cost.

⁴⁰ Nicole Prchal Svajlenka and Tom Jawetz, *A Demographic Profile of TPS Holders Providing Essential Services During the Coronavirus Crisis*, CENTER FOR AMERICAN PROGRESS (April 14, 2020),

www.americanprogress.org/issues/immigration/news/2020/04/14/483167/demographic-profile-tps-holders-providing-essential-services-coronavirus-crisis/.

⁴¹ See e.g., *Somalia's path to recovery*, BROOKINGS INSTITUTE (Oct. 2, 2019),

www.brookings.edu/blog/future-development/2019/10/02/somalias-path-to-stability/; Nurith Aizenmen, *What You May Not Realize About The End Of TPS Status For Salvadorans*, NPR (Jan. 9, 2018),

www.npr.org/sections/goatsandsoda/2018/01/09/576583550/what-you-may-not-realize-about-the-end-of-tps-status-for-salvadorans.

⁴² Yinka Adegoke, *Remittances from migrants to African countries will plunge by nearly a quarter this year*, QUARTZ (April 24, 2020),

<https://qz.com/africa/1844973/world-bank-remittances-to-africa-to-plunge-by-a-quarter/#:~:text=In%20South%20Sudan%2C%20remittances%20of,the%20highest%20in%20the%20region.>

⁴³ *Id.*

National Organizations

Advocating Opportunity
African Communities Together
Alianza Americas
Alianza Nacional de Campesinas
America's Voice
American Immigration Council
American Immigration Lawyers Association
American-Arab Anti-Discrimination Committee (ADC)
Asian Pacific American Labor Alliance, AFL-CIO
AsylumConnect
Benedictine Sisters of Baltimore
Black Alliance for Just Immigration (BAJI)
Black LGBTQIA+ Migrant Project
Boston University International Human Rights Clinic
Cameroon American Council
CASA REINA
Center for Gender & Refugee Studies
Center for Law and Social Policy (CLASP)
Center for Popular Democracy
Center for Victims of Torture
Church World Service
CRC Office of Social Justice
Daily Kos
Detention Watch Network
Disciples Immigration Legal Counsel
Dominican Sisters
Dominican Sisters of Adrian
Evangelical Lutheran Church in America
Families Belong Together
Franciscan Sister of the Poor
Freedom for Immigrants
Freedom to Thrive
Friends in Solidarity with South Sudan
Hispanic Federation
Holy Spirit Missionary Sisters, USA-JPIC
Holy Union Sisters
Human Rights First
IHM Sisters
Immigration Hub
International American Relief Society IARS
International Refugee Assistance Project
International Rescue Committee
Japanese American Citizens League
Justice Action Center
Justice For Our Neighbors
Laura Peralta-Schulte
Lights for Liberty

Maryknoll Office for Global Concerns
Mi Familia Vota
MomsRising
Muslim Public Affairs Council (MPAC)
National Asian Pacific American Women's Forum (NAPAWF)
National Association of Social Workers
National Council of Asian Pacific Americans
National Health Law Program
National Justice for Our Neighbors
National Korean American Service & Education Consortium (NAKASEC)
National Network for Immigrant & Refugee Rights
National Organization for Women
Network in Solidarity with the People of Guatemala (NISGUA)
Nicaragua Center for Community Action
Northeastern University School of Law Immigrant Justice Clinic
NOVA Friends of Refugees
Our Lady of Victory Missionary Sisters
Poder Latinx
Provincial Council Clerics of St. Viator (Viatorians)
RAICES
Service Employees International Union (SEIU)
Sisters of Mercy of the Americas - Justice Team
Sisters of Notre Dame de Namur USA
Sisters of St. Francis of Philadelphia Justice, Peace and Integrity of Creation Committee
Sisters of St. Francis of the Providence of God
Sisters of St. Francis, Clinton, Iowa
South Asian Americans Leading Together (SAALT)
Sudan Mission Network, Presbyterian Church (U.S.A.)
UndocuBlack Network
Unitarian Universalist Service Committee
United We Dream Action
U.S. Committee for Refugees and Immigrants
Water for South Sudan
Wheaton Franciscans JPIC Office
Win Without War
Women's Alliance for Theology, Ethics, and Ritual (WATER)
World Vision US

Regional, State, and Local Organizations

ABISA
Adhikaar
Advocates for Immigrant Rights and Reconciliation
Alianza Sacramento
American Friends Service Committee, Colorado
AMEXCAN
Ascentria Care Alliance Immigration Legal Assistance Program
Asylee Women Enterprise, Inc.
Beacon Presbyterian Fellowship

Black Immigrant Collective
Benedictine Sisters of Chicago
Campaign for Immigrant Detention Reform (CIDR)
Canal Alliance
Caribbean Community Service Center (CCSC)
Carolina Immigrant Alliance
Catholic Charities Archdiocese of Boston
Catholic Charities of West TN
Catholic Charities Tompkins Tioga
Catholic Legal Services
Central American Resource Center
Central American Resource Center --CARECEN SF
Centro Romero
Children's Law Center of MA
Church of Our Saviour/La Iglesia de Nuestro Salvador
Church of the Ascension
Church Women United in New York State
Cleveland Jobs with Justice
Coalition for Humane Immigrant Rights (CHIRLA)
Colorado Immigrant Rights Coalition
Colorado Jobs with Justice
Community Legal Access
COPAL
Crossing Borders - Dubuque
CT Shoreline Indivisible
Doctors for Camp Closure Oregon Chapter
Dominican Sisters of San Rafael
Education and Leadership Foundation
ELCA
Families Rights Network
FANM In Action
FIRN
Friends of Broward Detainees
Friends of Broward Detainees
Generous Heart Sangha
HAITIAN AMERICANS UNITED INC
HAITIAN BRIDGE ALLIANCE
Hispanic Baptist Convention of Texas
Illinois Coalition for Immigrant and Refugee Rights
Immigrant Hope-Clifton NJ
Immigrant Legal Advocacy Project
Immigrant Legal Center of Boulder County
Intercommunity Justice and Peace Center
International Center of Kentucky
International Institute of New England
Iraqi Association of Maine
Jesuit Social Research Institute/Loyola University New Orleans
Jewish Voice for Peace, Atlanta Chapter

Kentucky Coalition for Immigrant and Refugee Rights
La Union Del Pueblo Entero (LUPE)
Maine Business immigration Coalition
Massachusetts Immigrant and Refugee Advocacy Coalition
Massachusetts Law Reform Institute
Michigan United
MinKwon Center for Community Action
Mississippi Center for Justice
National Lawyers Guild of Los Angeles
New Sanctuary Movement of Atlanta
New York Immigration Coalition
Northern Illinois Justice for Our Neighbors
Northern Virginia Friends of Refugees
OneAmerica
Our Lady Queen of Peace
Pax Christi Illinois
Pennsylvania Council of Churches
Pennsylvania Immigration and Citizenship Coalition
Pilipino Workers Center of Southern California
Pittsburgh LCLAA
Please Select a Prefix
Political Asylum Immigration Representation (PAIR) Project
Redstone Presbytery
Region VI Coalition for Responsible Investment
Rian Immigrant Center
Sacramento Immigration Coalition
Saint Patrick's Church
Salvadoran American Leadership and Educational Fund
San Luis Valley Immigrant Resource Center
Seattle Immigrant Rights Action Group
SIREN (Services, Immigrant Rights and Education Network)
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
Sisters of St. Dominic of Blauvelt, New York
Sisters of St. Joseph of Carondelet Albany province
Sisters of St. Joseph of Carondelet, LA Province
Sisters of St. Joseph of Concordia, Kansas
Sisters of the Presentation
Sisters of the Presentation of the BVMof Aberdeen SD
Social Justice Coalition: Central Lutheran Church
Southerners On New Ground
St John of God Church Sanctuary Committee
St. John's Episcopal Church, Athol, MA and St. Paul's Episcopal Church, Gardner, MA
St. John's Presbyterian Church in Berkeley
St. Paul's Lutheran
St. Scholastica Monastery
Texas Civil Rights Project
The Boma Assistance Group for South Sudan
Trinidad Raj Molina

Trinity Presbytery South Sudan Ministry
True Alliance Center Inc.
United African Organization
United Food and Commercial Workers Local 1445
University Legal Assistance
University of Maryland Carey Immigration Clinic
University of San Francisco
Wallingford Indivisible
Washington Immigrant Solidarity Network
Wayne Action for Racial Equality
WESPAC Foundation, Inc.
Wilco Justice Alliance (Williamson County, TX)
Wind of the Spirit Immigrant Resource Center
Yemeni American Merchants Association