

CLASP

Policy solutions that work for low-income people

December 23, 2019

Submitted via www.regulations.gov

Ms. Samantha Deshombres, Chief
Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Ave. NW
Washington, DC 20529

Re: U.S. Citizenship and Immigration Services Fee Schedule, DHS Docket No. USCIS-2019-0010; RIN 1615-AC18

Dear Chief Deshombres,

The Center for Law and Social Policy (CLASP) respectfully submits this comment on the proposed U.S. Citizenship and Immigration Services (USCIS) Fee Schedule, published on November 14, 2019. **We are concerned about a number of the fee and policy proposals in the published fee schedule, and request that USCIS withdraw all provisions that make immigration benefits less accessible to low-income and other vulnerable immigrants.**

Established in 1969, CLASP is a national, non-partisan, non-profit, anti-poverty organization that advances policy solutions for people with low incomes. Our comments draw upon the work of CLASP experts in the areas of immigration and anti-poverty policies. As a national anti-poverty organization, we understand the critical importance of federal programs that support the health and economic well-being of families with low incomes.

The proposed USCIS fee schedule disproportionately increases fees and eliminates fee waivers for the benefit categories most commonly used by immigrants with low incomes, leaving essential immigration benefits accessible primarily to the affluent. These unwarranted changes would result in financial hardship for immigrant and mixed-status families, immigrants delaying or losing immigration status due to financial considerations, increased dependence on debt to finance applications, and decreased involvement of qualified legal assistance resulting in difficult and inefficient USCIS processing and adjudication, among many other problems.

Immigration fees represent a significant cost to immigrants, with low-incomes, and the inability to obtain a fee waiver will prevent many individuals from obtaining or renewing critical immigration benefits, including applications for lawful permanent residency and naturalization.¹ Without the stability and opportunity provided by lawful status, individuals and their families will experience significant hardship.

Research shows that access to lawful permanent residency and citizenship can help lift families out of poverty and create economic prosperity for immigrants and their children—as well as their communities.² Lawful status and

¹ USCIS, “I-912, Request for Fee Waiver,” Last Reviewed/Updated: 08/13/2018, <https://www.uscis.gov/i-912>

² Demetrios G. Papademetriou, Madeleine Sumption, and Will Somerville. *The Social Mobility of Immigrants and Their Children*. Migration Policy Institute, 2009. <https://www.migrationpolicy.org/research/social-mobility-immigrants-and-their-children>

citizenship can help parents secure better paying jobs, increasing their economic mobility and reducing the stress associated with living without legal status. These benefits are passed down to children—especially when parents are able to obtain legal status early in their child’s life—leading to better educational and workforce outcomes when their children reach adulthood.³ By making it more difficult to qualify for a fee waiver and thereby delaying or barring the ability to apply for immigration benefits, this proposal is taking away a critical ladder to stability for immigrant families with low incomes, which will have implications for generations.

The proposed USCIS fee schedule must be seen in the context of other changes that the Administration has made or is planning to make that also make it more difficult for immigrants with low incomes to come to the U.S., obtain green cards, and become naturalized U.S. citizens. USCIS has already made it harder for individuals to obtain fee waivers by removing receipt of public benefits as evidence of need. It has also pushed forward regulations to radically rewrite the concept of “public charge” so that it would impact many more immigrants, in spite of hundreds of thousands of public comments in opposition. Together, these policies significantly undermine our system of family-based immigration, replacing it with a wealth test that would close the door on those seeking family reunification and the opportunity to build a better life in the United States.

CLASP opposes USCIS’ attempt to place the burden of its own mismanagement on the backs of hard-working immigrant families. Since 2010, USCIS has increased filing fees by weighted averages of 10 percent and another 21 percent but has not achieved any associated improvement in processing times, backlogs, or customer service. During that same period, USCIS’ backlog has increased by more than 6,000 percent,⁴ the overall average case processing time had increased 91 percent between 2014 and 2018,⁵ and USCIS has removed language from its resources that stated any commitment to customer service.⁶ USCIS’ purported shortfalls are a manmade problem that is a result of its poor policy and organizational choices.

USCIS should promptly withdraw the provisions of its proposed fee schedule that would make immigration benefits less accessible to hard-working families and vulnerable people. USCIS has not used the filing fees applicants have already paid to USCIS efficiently, and they must not be expected to bear a significant increase in fees without improvement in processing times, backlogs, and customer service. In the comments that follow, we describe in further detail some of main reasons for our opposition. Omission of any proposed change from this comment should not be interpreted as tacit approval. We oppose all aspects of the proposed fee schedule that would act as a barrier between immigrants with low incomes and the immigration benefits for which they qualify.

USCIS’ Proposal to Limit Payment Types Would Disadvantage Low-Income Immigrants

USCIS proposes to make the method of fee payment changeable form-by-form through a designation in the form instructions. This would allow USCIS to prohibit the use of certain types of payment, like cashier’s checks or money orders, for certain application or petitions in favor of other methods of payment such as online payments. This proposed limitation would cause hardship to low-income applicants and petitioners, as reliable internet access, U.S. bank accounts, and well-established credit scores are assets that may only be available to more

children

³ Lisa A. Keister, Jody Agius Vallejo, E. Paige Borelli. *Mexican American Mobility: An Exploration of Wealth Accumulation Trajectories*. Stanford Center on Poverty and Inequality, April 2013.

https://inequality.stanford.edu/sites/default/files/media/_media/working_papers/keister_agius-vallejo_borelli_mexican-american-mobility.pdf

⁴ See *Policy Changes and Processing Delays at U.S. Citizenship and Immigration Services: Hearing before the House Subcommittee on Immigration of the H. Comm. On the Judiciary*, 116th Cong. (2019) (joint written testimony of Don Neufeld, Associate Director, Service Center Operations Directorate, USCIS, and Michael Valverde, Deputy Associate Director, Field Operations Directorate, USCIS).

⁵ Am. Immigr. Law. Assoc., AILA Policy Brief: USCIS Processing Delays Have Reached Crisis Levels under the Trump Administration (2019), <https://www.aila.org/advo-media/aila-policy-briefs/aila-policy-brief-uscis-processing-delays>.

⁶ See Max Greenwood, *Immigration Agency Removing ‘Nation of Immigrants’ from Mission Statement*, THE HILL, Feb. 22, 2018, <https://thehill.com/homenews/administration/375112-us-immigration-agency-to-remove-reference-to-us-as-nation-of>; see also Policy Alert: USCIS Public Services No. PA-2019-03 (May 10, 2019).

wealthy immigrants. As advocates for hard-working immigrant families of more modest means, we request that USCIS accept cashier's checks and money orders as methods of payment for all applications and petitions.

USCIS' Proposal to Transfer Applicant Fees to ICE Is Improper

In the proposed fee schedule, USCIS seeks over two years to transfer \$415.2 million in applicant fees held in the Immigration Examinations Fee Account, or IEFA, to Immigration and Customs Enforcement, or ICE, for enforcement purposes. CLASP vehemently opposes this misuse of applicant fees.

Congress codified in the Immigration and Nationality Act, or INA, that the applicant-funded IEFA is USCIS's "primary funding source" used "to fund the cost of processing immigration benefit applications and petitions"—that is, "to adjudicate applications and petitions for benefits under the Immigration and Nationality Act and to provide necessary support to adjudications and naturalization programs." Despite this clear statutory instruction, however, USCIS seeks to transfer those funds to serve another purpose. By unnecessarily and wrongfully transferring funds from IEFA to ICE, USCIS is betraying not only its own mission but also Congress's clear statutory intent. We find it wholly improper to accept payments from immigrants intended for adjudication of their immigration benefits, and to redirect those funds to be used for enforcement against their communities.

Moreover, it is outrageous that USCIS seeks to transfer funds away from EFA for enforcement purposes, and then claims that its budget shortfall forces it to raise fees and eliminate fee waivers. This transfer of funds is strong evidence that the proposed increases are not simply a neutral response to DHS's need to cover its costs but are in fact part of an overall effort to make it harder for low-income immigrants to obtain green cards and citizenship. Similarly, the proposed rule's incorporation by reference of the arbitrary 125 percent of the federal poverty level threshold for public charge is a backdoor attempt to codify that policy, in spite of federal court injunctions.

USCIS Should Maintain Fee Waivers for All Current Categories

The fee schedule proposes to eliminate filing fee waivers for all categories except those that are statutorily required. This proposal would make essential benefits such as citizenship, green card renewal, and employment authorization inaccessible for low-income immigrants. In eliminating the fee waivers for the most common application types, including employment authorization, legal permanent residence, and naturalization⁷, the Department will elevate the barrier to entry for immigrants with low-incomes. This administration simultaneously claims that immigrants should follow the rule of law and go through the process of citizenship and integration yet places higher barriers to entry that do not promote citizenship nor integration into American society.

Fee waivers help families to improve their stability, financially support themselves, and fully integrate into their communities. These immigration benefits have the power to lift up and transform families, communities, and the country as a whole. Because of the benefits of naturalization—one of the form types most frequently associated with fee waiver requests⁸—Congress has called on USCIS to keep the pathway to citizenship affordable and accessible.⁹ A recent Congressional Committee report states, "USCIS is expected to continue the use of fee waivers for applicants who can demonstrate an inability to pay the naturalization fee."¹⁰ USCIS' proposed elimination of filing fee waivers would severely undermine Congressional intent, and is also a flawed and shortsighted policy.

Adjustment of Status Applications Should Remain Bundled and Affordable

⁷ USCIS Fee Waiver Policies and Data, Fiscal Year 2017 Report to Congress, USCIS (Sept. 17, 2017), www.dhs.gov/sites/default/files/publications/USCIS%20-%20Fee%20Waiver%20Policies%20and%20Data.pdf.

⁸ USCIS Fee Waiver Policies and Data, Fiscal Year 2017 Report to Congress, USCIS (Sept. 17, 2017), www.dhs.gov/sites/default/files/publications/USCIS%20-%20Fee%20Waiver%20Policies%20and%20Data.pdf.

⁹ H. Rep. No. 115-948 accompanying H.R. 6776, the Department of Homeland Security Appropriations Act (2019).

¹⁰ Id. [Emphasis added].

USCIS proposes separate fees for concurrently filed Forms I-485, I-765, and I-131. Most applicants for adjustment of status who will file Form I-485 will also request employment authorization and advance parole travel authorization. Due to immigrant visa backlogs, applicants for adjustment often face long waits before their permanent residency is granted. They rely on employment authorization so that they can continue to live and work in the United States while their application is pending. These applicants will see a 79 percent increase in the total cost of filing Forms I-485, I-765, and I-131. The steep increase, from \$1,225 to \$2,195, and the elimination of fee waivers will make adjustment of status unattainable for many low-income and working class people who are immigrating through a U.S. citizen or lawful permanent resident relative. A minimum-wage worker who is likely already living paycheck-to-paycheck would have to work an extra 134 hours just to cover the increase in the application fees, resources that can be used for meeting other needs like rent, utilities, and food. Increasing the overall cost of adjustment of status would prevent many low-income individuals from becoming permanent residents and undermine family unity.

Fee Waivers Should be Available to Those Subject to the Affidavit of Support

USCIS proposes making fee waivers unavailable to applicants who are subject to the public charge ground of inadmissibility; those who are subject to an affidavit of support; and those who are already sponsored immigrants. The USCIS Director would also be barred from granting a discretionary fee waiver to anyone in the former categories. This proposal would drastically and disproportionately harm families with low and moderate incomes.

Most family sponsored immigrants are subject to the public charge ground of inadmissibility and are required to have an affidavit of support regardless of income.¹¹ Moreover, the affidavit of support contract terminates only after specific criteria are met.¹² The end result is that an immigrant would likely be barred from fee waiver eligibility for years, without regard to their actual need. This would create an additional barrier for immigrants with low incomes who seek immigration benefits that they would otherwise be eligible for, including naturalization.

USCIS Should Not Impose a Renewal Fee for DACA

The current total fee for Deferred Action for Childhood Arrivals (DACA) renewals is \$495. USCIS proposes to establish a new, additional \$275 fee for Form I-821D, which would raise the new total cost for DACA renewal to \$765. This 55 percent increase would create a significant barrier to accessing the protection from deportation and work authorization young immigrants need for their stability and that of their families

Most DACA requesters are, by definition, young people who often struggle to afford the existing DACA request fee. Of the approximately 660,880 total active DACA recipients reported on June 30, 2019, approximately 544,180 are age 30 or below, and 112,160 of that number are fifteen to twenty years old. In a 2015 survey of DACA recipients, nearly 70 percent of respondents indicated that they struggled to pay their monthly bills and expenses with their current incomes. However, 80.6 percent of respondents indicated that they were employed, and 80.1 percent believed that DACA would help them achieve their professional goals.

The proposal to increase DACA renewal fees represents another egregious attack by this Administration on the wellbeing of DACA recipients and the communities in which they live. DACA has proven to be an effective tool for economic mobility.¹³ DACA has enabled recipients to achieve their professional goals, with hundreds of DACA

¹¹ INA 212(a)(4)(C); 8 CFR 213a.2(b)(1).

¹² "The liability of the sponsor executing the affidavit of support terminates only when the sponsored immigrant becomes a U.S. citizen, earns or is credited with a total of 40 qualifying quarters as defined by social security law; dies; loses or abandons LPR status and departs the U.S.; or is ordered removed but readjusts status in immigration proceedings." See 8 CFR § 213a.2(e)(2)(i).

¹³ Tom K. Wong, "Amid Political Uncertainty, DACA Remains Important As Ever" Center for American Progress, 2019.

recipients currently working as teachers, social workers, business owners, public servants, engineers, lawyers, nurses, and more.¹⁴ The contributions made by DACA recipients are undeniable and an increase in cost for renewal would only make it harder for them to contribute to their community and the economy. It would also place a strain on workplaces which employ DACA recipients. Already, more than 100,000¹⁵ individuals eligible for DACA have yet to renew, some because of the already high fee cost of \$495 plus attorneys' fees that they must pay every two years. Increasing the cost of renewal would result in more eligible young people who cannot afford the cost of renewal.

This increased cost for a DACA renewal would also put a strain on recipients' ability to continue to care for their families,¹⁶ including their children. DACA recipients are parents to more than 250,000¹⁷ U.S. citizen children. If an individual is unable to renew their DACA, they are at risk of losing their job and protection from deportation. The proposed fee increase places the children of DACA recipients at risk of being financially unstable due to their parents limited ability to provide for them, particularly in cases where parents become unemployed. Furthermore, loss of employment and associated healthcare benefits affects not only DACA recipients, but also their family members who are insured under their employer's policy. The loss of health insurance would prevent children from accessing the care that is crucial to their well-being and healthy development.¹⁸ Possible loss of DACA also places DACA recipients' children at higher risk of being separated from their parent as a result of deportation. Even if a child is not separated from a parent, the simple fear of possible deportation can cause them to suffer symptoms post-traumatic stress disorder.¹⁹

USCIS Should Not Impose a Fee to File for Asylum

USCIS plans to impose a \$50 fee for those filing for affirmative asylum. The U.S. has a moral imperative to accept asylum seekers as well as obligations under domestic and international laws. As a signatory to the 1967 Protocol of the 1951 Convention Relating to the Status of Refugees, the U.S. has an obligation to accept asylum seekers who seek protection.

While CLASP does not have expertise in asylum issues, we are gravely concerned with this proposed fee as many asylum seekers are also seeking to join family members already here in the U.S., many of whom have low incomes. While asylum seekers are awaiting the outcomes of their case, they rely on their families to help support them. This additional burden would likely impact their families, placing an additional strain on a tight household budget and creating another barrier to applying for asylum, which is the first step to getting on the path to long-term lawful status.

<https://www.americanprogress.org/issues/immigration/news/2018/08/15/454731/amid-legal-political-uncertainty-daca-remains-important-ever/>

¹⁴ Joe Zong, Ariel G. Ruiz Soto, Jeanne Batalova, Julia Gelatt, & Randy Capps. *A Profile of Current DACA Recipients by Education, Industry, and Occupation*. Migration Policy Institute, 2017. <https://www.migrationpolicy.org/research/profile-current-daca-recipients-education-industry-and-occupation>

¹⁵ Nicole Prchal Svajlenka, "Without Action More DACA Recipients Than Ever Before Could See Their DACA Expire in October." Center for American Progress, 2019. <https://www.americanprogress.org/issues/immigration/news/2019/09/05/474177/know-daca-recipients-united-states/>

¹⁶ Tom K. Wong, "Amid Political Uncertainty, DACA Remains Important As Ever" Center for American Progress, 2019. <https://www.americanprogress.org/issues/immigration/news/2018/08/15/454731/amid-legal-political-uncertainty-daca-remains-important-ever/>

¹⁷ Nicole Prchal Svajlenka, "Without Action More DACA Recipients Than Ever Before Could See Their DACA Expire in October." Center for American Progress, 2019. <https://www.americanprogress.org/issues/immigration/news/2019/09/05/474177/know-daca-recipients-united-states/>

¹⁸ Stephanie Schmit, Rebecca Ullrich, Patricia Cole, and Barbara Gebhard. *Health Insurance: A Critical Support for Infants, Toddlers, and Families.* *Building Strong Foundations: Advancing Comprehensive Policies for Infants, Toddlers, and Families*. CLASP and ZERO TO THREE, 2017. <https://www.clasp.org/publications/report/brief/health-insurance-critical-support-infants-toddlers-and-families>

¹⁹ Human Impact Partners, 2013. *Family Unity, Family Health: How Family-Based Immigration Reform Will Mean Better Health Outcomes for Children and Families*. <https://familyunityfamilyhealth.org/us-national-report-2013/>

Naturalization Fees Should Be Affordable

The proposed fee schedule would increase the filing fee for Naturalization from \$640 to \$1,170, an 83 percent increase. This substantial increase would make naturalization less accessible for low-income and working class people. The benefits of naturalization to individuals and the U.S. society cannot be overstated and the application must not be overpriced in order to avoid suppressing access to the benefits. “Citizenship can serve as a catalyst for immigrants to become more: dedicated to democratic principles; informed about the Constitution; engaged in political elections; represented in the political system; proficient in the English language; unified as families; employable in higher paying jobs; and integrated within a wider circle of people and institutions.”²⁰ With approximately 9 million Lawful Permanent Residents, or LPRs, eligible to naturalize who have not yet filed,²¹ and the significant benefits that immigrant integration brings to the United States, it is in the country’s best interests to incentivize naturalization by maintaining a low application fee.

In combination with the elimination of the fee waiver, the fee increase for Naturalization would make citizenship unattainable for low-income immigrants. Congress has called on USCIS to keep the pathway to citizenship affordable and accessible.²² Pursuant to this expectation, USCIS has historically redistributed a portion of the cost of naturalization applications among other application fee types to subsidize affordable naturalization and encourage immigrant integration.²³ This proposed fee rule would abandon that historic practice and charge the actual cost of naturalization to applicants, disregarding the agency’s previous concern for incentive and the affordability of naturalization. The proposed fee increase is contrary to Congressional intent, and contrary to the interests of the United States society and economy.

Proposal Disproportionately Harms Immigrant Women

Under the proposed changes, immigrant women would face disadvantaged making them far less likely to afford immigration benefits. Women’s overall economic status, relative to men, is widely understood to be lower—as is their likelihood of being caregivers and living in larger households, relative to men. Immigrant women, especially those who are Black, Latina, and Asian American and Pacific Islander (AAPI), generally are at higher risk of economic insecurity than men because of pay disparities, discrimination, overrepresentation in low-wage work, and disproportionate responsibility for caregiving.

Across the board, women earn less than men on average.²⁴ Immigrant women face an even greater wage gap compared to native-born and naturalized men: foreign-born, noncitizen women, on average, earned 58 cents for every dollar earned by native-born men in 2015.²⁵ Immigrant women also earn less on average than US-born women.²⁶ Women collectively comprise two-thirds of the low-wage workforce²⁷ and immigrant women are

²⁰ JEFF CHENOWETH AND LAURA BURDICK, CATHOLIC LEGAL IMMIGRATION NETWORK, *A MORE PERFECT UNION: A NATIONAL CITIZENSHIP PLAN*, at vii, <https://cliniclegal.org/resources/guides-reports-publications/more-perfect-union-national-citizenship-plan>.

²¹ Robert Warren and Donald Kerwin, *The US Eligible-to-Naturalize Population: Detailed Social and Economic Characteristics*, 3 J. Migration & Hum. Security 306, 306 (2015).

²² H. Rep. No. 115-948 accompanying H.R. 6776, the Department of Homeland Security Appropriations Act (2019).

²³ See, e.g., U.S. Citizenship and Immigration Services Fee Schedule, 75 Fed. Reg. 58,975, www.govinfo.gov/content/pkg/FR-2010-09-24/pdf/2010-23725.pdf.

²⁴ National Women’s Law Center, *Frequently Asked Questions About the Wage Gap*, 2018, <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2018/09/Wage-Gap-FAQ.pdf>; National Women’s Law Center, *The Wage Gap: The Who, Why, How, and What to Do*, 2017, <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/09/The-Wage-Gap-The-Who-How-Why-and-What-to-Do-2017-2.pdf>.

²⁵ Elise Gould, Jessica Schieder, Kathleen Geier, *What is the Gender Pay Gap and Is It Real?*, Economic Policy Institute, 2016, <https://www.epi.org/publication/what-is-the-gender-pay-gap-and-is-it-real/>.

²⁶ Institute for Women’s Policy Research, *Status of Women in the States: The Employment and Earnings of Immigrant Women*, 2018, <https://statusofwomendata.org/immigrant-women/>.

²⁷ Kayla Patrick, Meika Berlan, Morgan Harwood, *Low-Wage Jobs Held Primarily by Women Will Grow the Most Over the Next Decade*, National Women’s Law Center, 2018, <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/04/Low-Wage-Jobs-Held-Primarily-by-Women-Will-Grow-the-Most-Over-the-Next-Decade-2018.pdf>.

overrepresented to an even greater extent in low-wage jobs.²⁸

Given widespread economic insecurity among women working in low-wage jobs, immigrant women are more likely to be disproportionately harmed by the proposed changes, making it more difficult for immigrant women to obtain critical immigration benefits.

Conclusion

Our comments include citations to supporting research and documents for the benefit of USCIS in reviewing our comments. We direct USCIS to each of the items cited and made available to the agency through active hyperlinks, and we request that these, along with the full text of our comments, be considered part of the formal administrative record on this proposed rule for purposes of the Administrative Procedures Act.

Thank you for the opportunity to submit comments on the proposed fee schedule. Please do not hesitate to contact me at wcervantes@clasp.org to provide further information.

Sincerely,

Wendy Cervantes
Director, Immigration and Immigrant Families

²⁸ American Immigration Council, *The Impact of Immigrant Women on America's Labor Force*, 2017, <https://www.americanimmigrationcouncil.org/research/impact-immigrant-women-americas-labor-force>; National Women's Law Center, *Underpaid & Overloaded: Women in Low-wage Jobs*, 2014, https://nwlc.org/wp-content/uploads/2015/08/final_nwlc_lowwagereport2014.pdf.

APPENDIX I: CLASP'S CONTRIBUTORS TO OUR PUBLIC COMMENTS

Listed Alphabetically

Madison Allen is a senior policy analyst/attorney at CLASP, where she focuses on issues affecting access to health care and public benefits for immigrants and mixed-status families. Ms. Allen co-leads the Protecting Immigrant Families, Advancing Our Future Campaign in collaboration with the National Immigration Law Center. Prior to joining CLASP, Ms. Allen spent five years as an attorney with Charlotte Center for Legal Advocacy, where she provided direct legal representation to clients with low-incomes across public benefit programs and saw first-hand how programs like Medicaid, SNAP and SSI reduce economic hardship, improve health, and increase stability. She successfully challenged state agency decisions and identified several areas for systemic advocacy. Working together with partner organizations, Ms. Allen negotiated significant changes to Medicaid and ACA eligibility policies, providing access to health care for tens of thousands of immigrants. Ms. Allen holds a Juris Doctor from Tulane Law School and a bachelor's degree in public health from George Washington University. In 2016, she was presented with the New Leader in Advocacy Award by the National Legal Aid and Defender Association.

Wendy Cervantes is director of CLASP's immigration and immigrant families team, where she leads the organization's cross-team work to develop and advocate for policies that support low-income immigrants and their families. Ms. Cervantes is an expert on the cross-sector policy issues that impact children of immigrants, including family economics, child welfare, immigration, education, healthcare, and human rights. Prior to joining CLASP, Ms. Cervantes was vice president of immigration and child rights at First Focus, where she led the organization's federal policy work on immigration and established the Center for the Children of Immigrants. She also served as director of programs at La Plaza, a Latino community-based organization in central Indiana, where she oversaw the implementation and evaluation of education, health, and social service programs. Earlier in her career, Ms. Cervantes worked at the Annie E. Casey Foundation where she managed the national immigrant and refugee families and the District of Columbia portfolios. She also has experience as a community organizer and an adult ESL instructor. Ms. Cervantes currently serves on the advisory board of the Center on Immigration and Child Welfare and the Board of Welcome.US. The proud daughter of Mexican immigrants, Ms. Cervantes holds an M.A. in Latin American studies and political science from the University of New Mexico and a bachelor's in communications from the University of Southern California.

Elizabeth Lower-Basch is director of CLASP's income and work supports team. Her expertise is federal and state welfare (TANF) policy, other supports for low-income working families (such as refundable tax credits), systems integration, and job quality. From 1996 to 2006, Ms. Lower-Basch worked for the Office of the Assistant Secretary for Planning and Evaluation at the U.S. Department of Health and Human Services. In this position, she was a lead welfare policy analyst, supporting legislative and regulatory processes and managing research projects. She received a Master of Public Policy from Harvard University's Kennedy School of Government.

Vanessa Meraz is a research assistant with CLASP's immigration and immigrant families team. She provides research support on cross-sector policy issues like interior immigration enforcement, DACA, and immigrant access to public benefits. Prior to joining CLASP, Ms. Meraz interned at the Oklahoma State Senate as well as the Niskanen Center. She graduated cum laude from the University of Oklahoma (OU) with a B.A. in political science and a B.A. in letters-constitutional studies. During her undergraduate career, Ms. Meraz served as president of the Hispanic American Student Association and founder of Voto Latino, the university's first

Latinx civic engagement organization. Ms. Meraz is the proud daughter of Mexican immigrants, a Dreamer, and a first-generation college graduate.

Renato Rocha is a policy analyst with CLASP's Income and Work Supports team. He focuses on issues regarding work requirements and other related provisions across programs as well as access to public benefits for immigrant families. Prior to CLASP, Renato was an economic policy analyst at UnidosUS (formerly National Council of La Raza), where he conducted analysis of consumer protection, budget, tax, disaster relief, and labor issues that impact the wellbeing of Latino and immigrant communities. Earlier in his career, Renato engaged in efforts to promote comprehensive immigration reform and advocate for enforcement of farmworker labor-protection laws at Farmworker Justice. In graduate school, he also had the opportunity to work at the National Immigration Law Center, where he analyzed policy issues affecting deferred action recipients. Renato holds a Master in Public Affairs from Princeton University's Woodrow Wilson School of Public and International Affairs and a B.A. in Politics from Occidental College. In 2013, Renato served as a Fulbright Public Policy Initiative Fellow to Mexico.