



Debbie Seguin
Assistant Director, Office of Policy
U.S. Immigration and Customs Enforcement, Department of Homeland Security
500 12th Street SW
Washington, DC 20536

September 24, 2018

Re: ICEB-2018-0002

Dear Assistant Director Seguin:

Prevent Child Abuse New York (PCANY) works to educate and inform policymakers and the public about what constitutes abuse and how to both prevent it and mitigate its effects. We also help communities understand trauma and build resiliency.

The Administration's initial policy of separating children from their parents at the Mexican border will have long-term consequences for those children. The trauma they experienced will manifest itself in poor health and educational outcomes and will bleed into their adult relationships. Their families will never fully recover.

The new proposal, to keep families together in detention for the duration of legal proceedings, is no more constructive. Children should not be detained under any circumstances, but should be housed in the community, with their families, and receive the proper supports. Our country, if not prepared to roll out the welcome mat, should respect immigrant families' desire to be in this country and should make that re-location as non-traumatic as possible.

Furthermore, the rule would allow the federal government to house families in facilities that are not state licensed. This would create a situation where there is no government oversight and subsequently no reason for facilities to provide proper care. The opportunities for abuse are many. We strongly oppose this provision.