October 27, 2017

The Honorable Elaine C. Duke
Acting Secretary
U.S. Department of Homeland Security
Washington, D.C. 20528

Dear Acting Secretary Duke,

We the 121 undersigned faith-based, legal, non-profit, academic, and other organizations from across the country condemn your decision to terminate Temporary Protected Status (TPS) for Sudan. We urge you to reconsider and extend TPS for Sudan for 18 months.

On November 4, 1997, the Attorney General designated Sudan for TPS due to: (1) an ongoing armed conflict, and that because of such conflict, requiring the return of nationals to Sudan would pose a serious threat to their personal safety; and, (2) extraordinary and temporary conditions within Sudan that prevented nationals from returning in safety. Since then, this designation has been extended and/or redesignated consistently, with the last redesignation being in 2013 and the last extension coming in 2016. In 2016, the Federal Register Notice extending TPS for Sudan noted that, “[t]he political and humanitarian situation in Sudan continues to be volatile and dangerous with internal armed conflicts in Darfur and in the Two Areas (South Kordofan and Blue Nile states). Reports of violations and abuses of human rights and violations of international humanitarian law persist, with those reports indicating that such violations and abuses have been largely perpetrated by the Sudanese government forces and pro-government militias against civilians.”

These country conditions have not changed. While the Federal Register notice terminating the Sudan designation (which was bizarrely retracted and re-published weeks later) argues that cessation of hostilities declarations have led to a decline in violence, this is simply not the case. In fact, a Human Rights Watch report from May 2017 notes that, “Sudanese Armed Forces and aligned forces, notably the newly created Rapid Support Forces, have continued to attack civilians in Darfur, Southern Kordofan, and Blue Nile with utter impunity”¹ and that national security agents continue to “engage in entrenched patterns of repression, targeting civil society leaders, human rights activists, and students for harassment, arbitrary detentions, and torture; restricting civil society organizations and independent media; and using lethal force to disperse protesters, killing hundreds in broad daylight.”²

Most recently, in September 2017, the Sudanese government attacked the Kalma Internally Displaced Persons (IDP) camp in Darfur. The attack was an especially egregious demonstration of the government’s atrocious human rights record and illustrates the continuing volatility of the situation on the ground. In fact, the U.S. Embassy in Sudan issued a statement condemning the attack, noting its deep concern with, “the excessive use of force by government forces in the September 22 clashes with internally displaced persons at Kalma camp in South Darfur” and calling on the Sudanese government to, “immediately launch a thorough and transparent investigation of the incident in which Sudanese security forces reportedly fired upon IDPs resulting in five deaths of both men and women and more than 26 injured.”³

² Id.
The Federal Register notice also notes that, “[as] a result of continuing armed conflict in these regions, hundreds of thousands of Sudanese have fled to neighboring countries.” Given this admission, it is inconceivable that Sudan no longer meets the conditions for TPS designation. In addition to those who have left Sudan, large numbers of IDPs are present in conflict-affected areas throughout the country. According to the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) and the Internal Displacement Monitoring Center (IMDC), Sudan was home to 3.3 million IDPs at the end of 2016. There is no evidence to suggest that this number has decreased since. According to OCHA, “[t]he Government of Sudan (GoS) estimates that 2.3 million people are displaced in conflict-affected areas. The United Nations and partners estimate that a further half a million displaced people live in host communities and settlements in Darfur. Armed movements in the Two Areas estimate that an additional 545,000 people are displaced in areas under their control.” These facts make clear that returning Sudanese nationals to Sudan would pose an incredible threat to their safety and put their lives at risk.

The majority of Sudanese nationals with TPS have been living and working in the United States for almost 20 years. They have built lives and have been contributing to the American Dream. Sending these individuals back to a country still suffering from war and conflict is cruel, inhumane, and runs contrary to our American values. We urge you to reconsider your decision and extend TPS for Sudan for a full 18 months.

Sincerely,

Adhikaar
Alianza Americas
Ameinu (Our People)
American Federation of Labor-Congress of Industrial Organizations (AFL-CIO)
American Federation of Teachers, Washington
American Friends Service Committee Iowa
Apostle Immigrant Services
Asian Americans Advancing Justice - Atlanta
Asian Services In Action, Inc.
Assisting Latinos
Barry Vega Law Group, Inc.
Benedictine Sisters of Baltimore
Berkshire Immigrant Center
Black Alliance for Just Immigration
Catholic Charities Archdiocese of Boston
Catholic Charities Bureau, Inc. Diocese of St. Augustine, Florida
Catholic Charities of the Archdiocese of Washington
Catholic Charities Tompkins/Tioga
Catholic Charities, Diocese of San Diego
Catholic Legal Immigration Network, Inc.
Catholic Legal Services, Archdiocese of Miami
Catholic Migration Services

---

Center for Gender & Refugee Studies
Central American Resource Center (CARECEN-DC)
Chicago Religious Leadership Network on Latin America
Church Council of Greater Seattle
Church of the Brethren
Church World Service
Colectiva Legal del Pueblo
Comunidad Colectiva
Council on American Islamic Relations - New York
Detention Watch Network
Diocesan Migrant & Refugee Services, Inc.
Disciples Refugee & Immigration Ministries
DRUM - Desis Rising Up & Moving
Ecumenical Ministries of Oregon
El Centro de la Raza
Florida Immigrant Coalition, Inc.
Franciscan Action Network
Gainesville Interfaith Alliance for Immigrant Justice
Global Justice Clinic, NYU School of Law
Global Unity Project
Haitian Community Partnership, Inc.
Health Care Access
Hispanic Federation
Holy Spirit Missionary Sisters, USA-JPIC
Iglesia Ministerios Ríos de Agua Viva UCC
Immigrant Law Center of Minnesota
Immigrant Legal Advocacy Project
Immigrant Legal Resource Center
Intercommunity Peace and Justice Center
International Refugee Assistance Project at the Urban Justice Center
IRIS - Integrated Refugee & Immigrant Services
Jesuit Social Research Institute
Jewish Council for Public Affairs
Justice, Peace and Reconciliation Commission, Priests of the Sacred Heart, U.S. Province
Kitsap Immigrant Assistance Center
La Casa de Amistad
Law Office of Malathi Benjamin PLC
Law Offices of Angela L. Williams, LLC
Lutheran Church of Our Redeemer
Lutheran Immigration and Refugee Service
Massachusetts Immigrant and Refugee Advocacy Coalition
Michigan Conference United Church of Christ
Migrant Support Center - Catholic Charities of Jackson, Mississippi
Migration & Refugee Services/Catholic Diocese of Lafayette, Louisiana
Murphy Initiative for Justice and Peace
Muslim Youth Network
National Partnership for New Americans
National Religious Campaign Against Torture
National TPS Alliance
NETWORK Lobby for Catholic Social Justice
New York Immigration Coalition
NOVA Friends of Refugees
Office of Social Justice, Christian Reformed Church in North America
Olivares Law Firm LLC
OneAmerica
Pax Christi Florida
Perretta Law Office
PICO National Network
Pierce County Labor Community Services Agency
Presentation Sisters at Caminando Juntos
Puget Sound Advocates for Retirement Action
Refugee & Immigration Services, Catholic Charities of Central and Northern Missouri
RefugeeOne
Religious of the Sacred Heart of Mary, Western American Province
Sauti Yetu Center for African Women and Families
SEIU 32BJ
SEIU California
SEIU Minnesota State Council
SEIU United Healthcare Workers West Latino Caucus
SEIU United Healthcare Workers West AFRAM - African Americans Caucus
SEIU United Healthcare Workers West Asian Pacific American Caucus
SEIU United Healthcare Workers West Lavender Caucus
Service Employees International Union (SEIU)
Services, Immigrant Rights, and Education Network (SIREN)
Sisters of Charity of Nazareth Congregational Leadership
Sisters of Charity of Nazareth Western Province Leadership
Sisters of Charity of the Blessed Virgin Mary
Sisters of Mercy of the Americas - Institute Justice Team
Sisters of Notre Dame
Sisters of St. Joseph of Boston
Sisters of St. Joseph, Third Order of St. Francis
Solidarity Committee, Sisters of Mercy of the Americas, West Midwest Community
South Asian Americans Leading Together (SAALT)
St. Francis Community Services
St. James Cathedral Immigrant Assistance
Success Is Yours
Tacoma Migrant Justice
Tennessee Immigrant & Refugee Rights Coalition
The United Methodist Church - General Board of Church and Society
Thrive International Programs
Unitarian Universalist Service Committee
UNITE HERE
United We Dream
Walla Walla Immigrant Rights Coalition
Washington Immigrant Solidarity Network
Washington State Religious Campaign Against Torture
We Belong Together
Welcoming the Stranger-Diocese of Cleveland
Women's Refugee Commission