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April 25, 2023

President Joseph R. Biden
The White House
1600 Pennsylvania Avenue N.W.
Washington, D.C. 20500

Alejandro Mayorkas
Secretary of Homeland Security
U.S. Department of Homeland Security
301 7th Street, S.W.
Washington, D.C. 2052

Antony Blinken
Secretary of State
U.S. Department of State
2201 C Street, N.W.

RE: REQUEST FOR DESIGNATION OF TEMPORARY PROTECTED STATUS AND
SPECIAL STUDENT RELIEF FOR TÜRKİYE

Dear President Biden, Secretary Mayorkas, and Secretary Blinken:

We, the undersigned 117 organizations, urge the administration to provide an 18-month designation of Temporary Protected Status (TPS) and Special Student Relief (SSR) for Türkiye. Türkiye is eligible for an immediate designation of TPS due to both natural disaster and extraordinary and temporary conditions following the destructive earthquakes that have claimed thousands of lives and collapsed hundreds of thousands of buildings in Türkiye. As Türkiye and its people continue efforts to recover and rebuild, the United States should use all humanitarian tools available to support its ally in recovery, including TPS.

A catastrophic 7.8 magnitude earthquake struck southern Türkiye on the early morning of February 6, with its epicenter located in the Pazarcık district of Kahramanmaraş province, near the border of northern Syria, releasing an amount of energy equivalent to roughly eight million tons of TNT.¹ Nine hours later, a 7.5 magnitude earthquake struck the same region. The earthquakes severely impacted at least eleven Turkish provinces of Kahramanmaraş, Hatay, Adıyaman, Malatya, Kilis, Osmaniye, Gaziantep, Elazığ, Şanlıurfa, Adana, and Diyarbakır, where approximately 15 million people, including around two million Syrian refugees, live. The earthquake and succeeding aftershocks have internally displaced 2.7 million people² in Türkiye and made safe return to the afflicted areas impossible. The following month, on March 15, torrential rains caused deadly flooding in Adıyaman and Şanlıurfa, provinces that were already

¹ Robin George Andrews, "Earthquakes Are Unlike Any Other Environmental Disaster," The Atlantic, February 7, 2023, <https://www.theatlantic.com/science/archive/2023/02/turkey-earthquake-death-toll-seismic-waves/672978/>.

² International Organization for Migration, "2023 Earthquakes Displacement Overview - Türkiye," ReliefWeb, March 6, 2023, <https://reliefweb.int/report/Türkiye/iom-2023-earthquakes-displacement-overview-Türkiye-march-2023>.

hit hard by the mega quakes. As a result of these catastrophic disasters, over 50,000 people have died and almost three million people have been displaced.³

Due to these emergent circumstances caused by massive earthquakes, we strongly urge the administration to take necessary measures to protect Turkish nationals in the United States and provide an initial 18-month designation of TPS for Türkiye.

Temporary Protected Status and Special Student Relief

The Secretary of Homeland Security has the authority to designate a country for Temporary Protected Status (TPS) if the Secretary determines that the country conditions temporarily prevent their nationals from returning safely, when the country is experiencing ongoing armed conflict, natural disaster (such as earthquake or hurricane), or other extraordinary and temporary conditions. Congress intended for TPS to serve as a humanitarian protection, allowing beneficiaries of a designated country to live and work in the United States without fear of deportation to life-threatening conditions.

Special Student Relief (SSR) provides essential flexibility in both employment and course load to international students experiencing economic hardship due to a crisis at home.

Temporary extraordinary conditions

Numerous aftershocks occurred following the first earthquake, with a second major quake of 7.5 magnitude striking the region after nine hours, causing further significant damage and destruction of already damaged structures. On the evening of February 20th, a 6.4 magnitude earthquake hit Hatay, centered in the Defne district. The event caused several damaged buildings in the province to collapse, adding to the number of casualties. Recent estimates conclude that since the earthquake first hit, 50,096 individuals have lost their lives, while 108,368 sustained injuries in Türkiye.⁴ Damage assessments reveal that 307,000 buildings across eleven provinces either collapsed or suffered immediately apparent extensive damage.⁵ According to the most recent assessments by the Turkish government, 893,302 independent sections of the 1,706,000 buildings in the impacted areas are heavily damaged and in need of immediate demolition.⁶ Due to the risk of additional damage from aftershocks, residents have been advised against entering their homes with many currently living in camps across the country.

In addition to the earthquake, heavy rainfall and flooding occurred in Adıyaman and Şanlıurfa provinces on March 15th. The death toll rose to 19, with 2 fatalities in Adıyaman and 17 in Şanlıurfa. Due to the intense rains and floods, numerous roads remain closed, dams are at full capacity, and a vast area of agricultural land has been negatively impacted. The floodwaters have also heightened the risk of further contamination of drinking water supplies, which are already compromised by significant infrastructure damage. This combined disaster has increased the demand for food, potable water, sanitation, and shelter.

³ “Death Toll Climbs above 50,000 after Turkey, Syria Earthquakes,” *Al Jazeera*, February 25, 2023, <https://www.aljazeera.com/news/2023/2/25/death-toll-climbs-above-50000-after-turkey-syria-earthquakes>.

⁴ UN Office for the Coordination of Humanitarian Affairs, “Türkiye: 2023 Earthquakes Situation Report No. 12,” ReliefWeb, March 30, 2023, <https://reliefweb.int/report/Türkiye/Türkiye-2023-earthquakes-situation-report-no-12-30-march-2023-entr>.

⁵ UN Office for the Coordination of Humanitarian Affairs, “Türkiye.”

⁶ “6 Şubat’taki depremlerde can kaybı 50 bin 500’e yükseldi,” *BBC News Türkçe*, February 6, 2023, <https://www.bbc.com/turkce/articles/c51kdv8d15jo>.

Based on an initial evaluation by the Ministry of Health, 25% of hospitals in the eleven affected provinces have experienced severe or moderate damage, while 15% of primary health care facilities (236 facilities in total) are non-functional. In the hardest-hit districts of the four provinces, the World Health Organization's preliminary assessment indicates that over 40% of district Health Directorates, more than 70% of family health centers, and 50% of migrant health centers have been damaged. Furthermore, nearly 60% of obstetrics and gynecology wards are out of service. Only around 30% of the pre-earthquake number of doctors and nurses are available to provide services. These factors all contribute to making a safe return for many Turkish citizens in the United States impossible.

Türkiye's Ministry of Finance and Treasury has released the first official damage report on the dual earthquakes that struck on February 6th, estimating the cost at around 2 trillion Turkish lira, or approximately \$130.6 billion. The ministry referred to the disaster as the "disaster of the century" and stated on Twitter that the cost is equivalent to nearly 9% of Türkiye's expected national income for 2023. The damage is approximately six times greater than that of the 1999 Marmara Earthquake. The total material damage from the earthquakes, which measured 7.9 and 7.7 on the Richter scale, represents more than one-eighth of the country's GDP in 2021, recorded at \$819 billion. The report underscored the dire housing situation following the devastating earthquakes. The eleven affected provinces contain 5.6 million residences, accounting for 14.05% of Türkiye's total housing stock.

In the interest of the United States

Granting TPS to Türkiye in the wake of the recent devastating earthquakes is not only a humanitarian gesture but also serves the national interest of the United States. Türkiye has been a valued North Atlantic Treaty Organization (NATO) ally and a critical regional partner to the United States. Following the destructive earthquakes on February 6, 2023, the United States reiterated and demonstrated its support for the Turkish people by providing \$185 million in humanitarian assistance to support Türkiye in its earthquake response.

U.S. support has played a crucial role in Turkey's rapid response to the earthquake. Nevertheless, the earthquake and its subsequent aftershocks have impacted more than just the directly affected regions. According to the World Bank's latest estimates, the earthquake has caused over \$35 billion in financial damage, equivalent to four percent of Turkey's GDP. Additionally, the Food and Agriculture Organization of the United Nations (FAO) estimates that Turkey's food production will decrease by 20 percent due to the earthquake. These consequences are already having a ripple effect on the entire economy. A report from the United Nations International Labour Organization (ILO) suggests that the earthquake has led to an immediate increase in unemployment by 658,000, with more than 150,000 workplaces expected to be unusable in the long term. There is substantial precedent for providing survivors of environmental disasters with TPS. After a 7.0 magnitude earthquake struck Haiti in 2010, and a 7.8 magnitude earthquake struck Nepal, then DHS Secretary Janet Napolitano granted both Haitian and Nepali nationals TPS. News outlets and others have made direct comparisons of the magnitudes and destruction of the disaster in Turkey and the Nepali earthquake in 2015, for which the United States granted TPS protection.⁷ U.S. immigration law, including TPS, reflects respect for the lives of people who, without protection, would be returned to hazardous, if not deadly, circumstances. Given

⁷ Natasha Frost, "How Strong Is a Magnitude-7.8 Quake?," *The New York Times*, February 6, 2023, <https://www.nytimes.com/2023/02/05/world/europe/how-strong-is-a-magnitude-7-8-quake.html>.

conditions in Türkiye, communities are facing lack of housing, food and water insecurity, access to health care, education, employment, and other services—the United States must support the Turkish nationals in the United States who are unable to safely return to Türkiye.

Granting TPS to Türkiye is also the morally right decision, as it demonstrates the United States' commitment to aiding countries in times of crisis. The United States has a long history of providing help, safety, and security to victims of catastrophic events, war, violence, and natural disasters. TPS reflects the United States' values, codified in the statute, by protecting people from unsafe conditions outside of their control. Designating Türkiye for TPS would bolster the moral standing of the United States and showcase the country's humanitarian values, while proactively showing support to an ally. Turkish nationals in the United States under TPS would be able to work and contribute to the U.S. economy. This would not only provide financial support for their families back in Türkiye but also strengthen the U.S. labor force and help fuel economic growth.

Conclusion

We are calling on you to designate TPS and SSR for Türkiye, to publish a timely Federal Register Notice, and to launch a public information campaign to notify the impacted community of the decision and any actions they must take by the designated deadline. We call for a minimum 180-day registration period for both current TPS holders and those who would benefit under redesignation. We urge you to not only grant the maximum protection for Türkiye but to implement that decision in a way that honors the dignity and humanity of the Turkish community in the United States. Please contact the appropriate representative with any questions or to arrange for stakeholder engagement. Thank you.

Sincerely,

International

American Friends Service Committee (AFSC)
Church World Service
Lutheran Immigration and Refugee Service
Service Employees International Union (SEIU)
Sisters of Charity of Nazareth Congregational Leadership
Sisters of St. Joseph of Carondelet Albany
The Campaign for Hong Kong
U.S. Committee for Refugees and Immigrants (USCRI)

National

African Communities Together (ACT)
Alianza Americas
American Immigration Lawyers Association
The Arab Community Center for Economic and Social Services (ACCESS)
Asian Americans Advancing Justice | AAJC
Asylum Seeker Advocacy Project (ASAP)
Cameroon Advocacy Network
Catholic Legal Immigration Network, Inc.
Center for Gender & Refugee Studies at UC Hastings
Communities United for Status & Protection (CUSP)

Cooperative Baptist Fellowship
Disciples Immigration Legal Counsel
Haitian Bridge Alliance
Immigrant Legal Resource Center
Immigration Equality
Institute for Justice & Democracy in Haiti (IJDH)
Justice Action Center
Latina Institute Texas
Leadership Team of the Felician Sisters of North America
MPower Change
Multifaith Alliance
National Council of Churches
National Immigrant Justice Center
National Network for Arab American Communities (NNAAC)
National Network for Immigrant and Refugee Rights
National Partnership for New Americans
NETWORK Lobby for Catholic Social Justice
No Separate Justice
Northeastern University School of Law Immigrant Justice Clinic
President' Alliance on Higher Education and Immigration
River Mountain Immigration
Sisters of Charity of Nazareth Western Province Leadership
Sisters of Charity of the Blessed Virgin Mary
SomaliCAN
U.S. Federation of the Sisters of St. Joseph
UndocuBlack.org
Women's Alliance for Theology, Ethics, and Ritual (WATER)

State and Local

ACCESS for California Services
ACCESS of Western New York
Al Otro Lado
Al-Bustan Seeds of Culture
Alif Institute
America's Voice
American Friends Service Committee, Colorado
American Syrian Arab Cultural Association
Arab American Cultural and Community Center
Arab American Action Network
Arab American Association of New York
Arab American Civic Council
Arab American Cultural Center of Silicon Valley
Arab American Family Services
Arab American Heritage Council
Arab Cultural and Community Center
Arab Film and Media Institute

Arab-American Family Support Center
ArteEast
Bostonbul, Inc.
Buen Vecino
Capuchin Franciscan Province of St. Joseph
Center for Arabic Culture
Central American Resource Center - DC
Central American Resource Center of Northern CA - CARECEN SF
Centro Romero
Chacon Center for Immigrant Justice at Maryland Carey Law
Church of the Ascension
Clergy and Laity United for Economic Justice Ventura County
Connecticut Shoreline Indivisible
Convencion Bautista Hispana de Texas
Culturingua
Diocesan Migrant and Refugee Services Inc
Desis Rising Up & Moving | DRUM
Elmahaba Center
Family Action Network Movement | FANM
Florida Immigrant Coalition
Florida Poor People's Campaign
Human Rights Initiative
Illinois Coalition for Immigrant and Refugee Rights
Immigrant Defenders Law Center
Immigrant Legal Center of Boulder County
International Institute of New England
Jewish Voice for Peace, Atlanta chapter
Just Neighbors Ministry
Long Island Immigration Clinic/Sisters of St. Joseph
Louisiana Organization for Refugees and Immigrants
Lutheran Social Services of the National Capital Area (LSSNCA)
Madjal, the Arab Community Center of San Diego
Markaz
Middle Eastern Immigrant and Refugee Alliance
Mizna
Opening Doors International Services, Inc.
Palestinian American Community Center
Philadelphia Arab-American Development Corps
Powers Law Group
Scioto Foundation Education
Seeds of Resistance
Sisters of St. Joseph of Carondelet, LA
Sisters, Home Visitors of Mary
Somali Action Alliance Education Fund
Somali Bantu Community of Greater Houston
Somali Family Service of San Diego

Syrian Community Network
True Alliance Center Inc
Turkish American Society of Minnesota (TASMN)
Venezuelans and Immigrants Aid (VIA)
Washington Street Historical Society
Wayne Action for Racial Equality
WESPAC Foundation, Inc.
Wilco Justice Alliance (Williamson County, TX)
Wind of the Spirit Immigrant Resource Center



**U.S. Citizenship
and Immigration
Services**

May 18, 2023

Ramya Reddy
Managing Policy Counsel
MASA Group
ramya@masadc.com

Dear Ms. Reddy:

Thank you for your April 25, 2023 letter to the Department of Homeland Security (DHS) in support of a designation of Turkey for Temporary Protected Status (TPS) and Special Student Relief (SSR) for Turkish nationals. I am responding on behalf of the Department.

The Secretary of Homeland Security may designate a country for TPS and extend or terminate a country's existing TPS designation based upon specific statutory criteria. In order to designate a country for TPS or extend a country's TPS designation, the Secretary must find one or more of the following: (1) there is an ongoing armed conflict within the country that would pose a serious threat to the personal safety of the country's nationals if they were returned; (2) there has been an environmental disaster resulting in a substantial, but temporary, disruption of the living conditions in the area affected, the country is temporarily unable to handle adequately the return of its nationals, and the country has officially requested TPS designation; or (3) there exists extraordinary and temporary conditions in the country that prevent nationals from returning in safety, and the Secretary does not find that permitting the country's nationals to remain temporarily in the United States would be contrary to the national interest of the United States.

The Secretary may authorize SSR after careful consideration of the conditions in the affected country. Under SSR, DHS may suspend certain regulatory requirements for F-1 nonimmigrant students from the affected country, such as minimum course load requirements and employment limitations. SSR allows students in F-1 student status, who are experiencing severe economic hardship resulting from the emergent circumstances in their country, to apply to U.S. Citizenship and Immigration Services (USCIS) for employment authorization. This suspension may include duration of status, full course of study, and requirements for on-campus and off-campus employment for eligible F-1 students. DHS makes decisions to designate TPS and SSR after consultation with interagency partners and careful consideration of the circumstances of the country.

I appreciate the concerns you have expressed and the information you have shared about the conditions in Turkey. Please be assured DHS continues to monitor conditions in Turkey and remains committed to administering its programs, including TPS and SSR, in an equitable

manner. DHS also offers support that may be available upon request¹ to assist eligible individuals residing in the United States affected by conditions there. Such support may include:

- Change or extension of nonimmigrant status, if eligible nationals are currently in the United States, even if the request is filed after the authorized period of admission has expired;
- Expedited processing of requests for advance parole documents;
- Expedited adjudication of requests for off-campus employment authorization for F-1 students experiencing severe economic hardship;
- Expedited adjudication of employment authorization applications, where appropriate;
- Assistance if applicants received a Request for Evidence or a Notice of Intent to Deny and were unable to appear for an interview, submit evidence, or respond in a timely manner because of the natural disaster; and
- Replacement of lost or damaged immigration or travel documents issued by USCIS, such as a Permanent Resident Card (Green Card).

Thank you again for your letter and interest in this important issue. Please share this response with the other organizations that cosigned your letter. Should you require any additional assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ur M. Jaddou", followed by a long horizontal flourish.

Ur M. Jaddou
Director

¹ Additional information is available at the U.S. Citizenship and Immigration Services website at: <https://www.uscis.gov/humanitarian/special-situations>.