

January 25, 2022

The Honorable Ron DeSantis
Governor of the state of Florida
400 S. Monroe St.
Tallahassee, FL 32399-0001

RE: Withdrawal of Emergency Rule: 65CER21-3-Standards for Unaccompanied Alien Children (UAC) Homes and Unaccompanied Refugee Minor Programs under the Florida State Department of Children and Families Division of Family Safety and Preservation Program

Dear Governor DeSantis,

On behalf of the Hispanic Federation and its network of Latino community-based member organizations and partners across the state, we write to strongly urge you to withdraw Emergency Rule 65CER21-3 presented in the Florida Administrative Code (FAC) on December 10, 2021. Executive Rule 65CER21-3 establishes enormous burdens on state federally contracted nonprofit caregivers and businesses - such as child-placing agencies and residential child-caring agencies - to apply for, renew, and maintain their state licenses and inflicts extreme and adverse deprivations to the most vulnerable minor children in need of care in our state.

We are asking for your swift action in withdrawing the Standards for Unaccompanied Alien Children (UAC) Homes and Unaccompanied Refugee Minor Programs. The issuance and renewal of state licenses via the Florida Department of Children and Families (DCF) is a critical component in ensuring the wellbeing and safety of all children in licensed care facilities and homes. The proposed executive rule poses the following undue burden(s):

- Restricting the ability of foster families, shelters, and faith-based organizations to serve vulnerable children and families by requiring them to choose only one group of vulnerable children to serve.
- Eliminating access of qualified federally contracted child-caring and serving organizations to necessary licensing applications and approval.
- Forcible removal of minor children from stable and supportive care facilities and homes due to loss of licensure under the new rule.

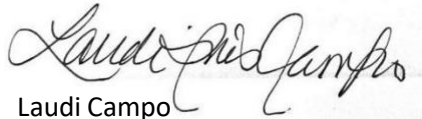
These committed organizations, in partnership with the Florida Department of Children and Families (DCF), assist the most vulnerable individuals in our communities, and in this case, susceptible minor children seeking asylum under the U.S. Department of Health and Human Services Office of Refugee Settlement (ORR). Foster care and shelter facilities are critical components in the family reunification and sponsoring process.

We note that unaccompanied children who arrive in the United States without legal guardians are granted special protection under the William Wilberforce Trafficking Victims Protection Reauthorization Act (TVPPRA). This law requires unaccompanied minors from non-contiguous countries who are received by

the U.S. Customs and Border Protection (CBP) to be transferred into the custody of the Office of Refugee Resettlement (ORR) through the U.S. Department of Health and Human Services (HHS). To keep these children safe, ORR relies on a network of childcare providers, including faith-based organizations, to provide temporary care in shelters or foster families until the child reunites with their vetted and approved family member or sponsor. These childcare providers are legally required to be licensed by state officials to ensure proper state oversight and the wellbeing of children. Blocking access to issuance and renewal of these state licenses prevents families from serving as foster parents for migrant children and prevents agencies from coordinating care for children in need of foster care families – including those that are Florida-born.

We look to you to ensure that all of Florida's children, regardless of where they were born, have the right and inherent dignity to grow healthy and thrive in safe, stable caring environments. We look forward to your response and to working together to serve in the best interests of all of Florida's children.

Respectfully,



Laudi Campo
Florida State Director
Hispanic Federation

Organizations

Bethany Christian Services
Boricuas de Corazón Inc
Broken Wings Counseling
Central Florida LCLAA Chapter
Chispa Florida
City of Orlando HOLA
Claritas House
Colectivo ÁRBOL
Del Ambiente
Eben-Ezer Ministries Corp
Familias Presentes Movement
Farmworker Association of Florida
Florida Senator - Victor Torres
Foster Kids
Freedom Network USA
Hispanic Federation
Hope Community Center, Inc.
Iglesia Episcopal Jesus de Nazaret
Iniciativa Accion Puertorriqueña
Justice should be for all
La Iniciativa
Latin Community Health Advisors
Latino Leadership
Misión Boricua
National Council of Jewish Women
Notre Dame Mission Volunteers AmeriCorps
Puerto Rican Bar Association of Florida
The Advance Community Outreach Center
Unidos por Ecuador of Central Florida Inc
Ventanilla de Salud
Vida Nueva
Voces Unidas por la Educación
WeCount!

Individuals

Elizabeth Franqui Franqui

Paola De Souza

Kristine Persaud

Cecilia Ventura

Madeline Tavarez

Linda Perez

Ruthelyn Rojas

Maribel Gomez Cordero

Victor Sanchez

Maria Revelles

Krizia López-Arce

Maria Revelles

Ana Cruz

Doreen Barker

Isaret Jeffers

Ricardo J Negron-Almodovar

Peter Baez

Aixa Machuca

Hannah Baez

Johanna Lopez

Samuel Vilchez Santiago

Nezahualcoyotl Xiuhtecutli

Victor Torres

Andreina Cura

Jean Bruggeman

Laudi Campo

Ines Santiago

Robert Edwards

Nomarys Cabiya

Mario Rosa

Elaine Rodriguez

Freddie Agrait

Francisco Ortiz

Yolanda De Jesus

Marielys Cabiya

Aura De Jesus

Yusvelys Garcia

Janice Ruiz

Marie Figueroa

Fabiola Mendoza

Amaury Caraballo-Rodriguez

Ignacio Vega Santos

Gabriela Vega-Rodriguez

Ramon Cabiya

Sheraly Gonzalez

Vilma Moleiro

Alexis Izquierdo

Deborah Ofsowitz

Laura Firtel

Jose Rodriguez

Meilin Rivera

Nancy Morales-Benitez

Josie Medina

Alfonso Nathan Ramos

Sylvia Marcano

Betsy Franceschini

Janice Febo

Lydia Ríos

Jariel Febo

Sariel Febo

Marucci Guzmán

Adela Lopez

Laura Rodriguez

Chavon Thomas-Robinson

Delmarie Alicea

Zaida Castellano

Norberto Fonseca

Wanda Rios

Nicole Chica

Gabriel Becerra

Ketty Orellana

Franklin Munoz

Nicole Chica

Aracely Robledo

Tony Hernandez

Johanna López

Claudia Navarro

Carly Hodges-Edwards

Alonso Garcia

Irene Rovaina

Nelson Rovaina

Jose Javier Perez

Tarin Fernandez

Harry Davila

Zaida Santana

Arellys Gomez

Ruthelyn Rojas

Jose Vazquez

Maruxa Cardenas

Luz Sepulveda

Jimmy Torres Velez

Edgar Vazquez Cruz

Raul Rivera

Luis Campo

Mario Rosa

Alina Rivera-Campo

RJ Perez

Alejandra Rivera-Campo

Sonia Moreno

Cesar Hernandez

Gonzalo Hernandez

Oscar Ortiz

Jean Rivera

Shella Bergquist

Johana Florez

Kayla Rivera

Pamela Perez

Milo Cruz

Olivia Brown

Alicia Lagadeau

Victoria Lagadeau

Jafet Rios

Ahlam Omar

Carly Tamborello

Alyssa Rivera

Liliana Umpierre

Raul Rodriguez

Jose Rodriguez

Nerza Garcia

Zuleyka Collazo

Deborah Ofsowitz

Sandra I Camacho

Maria Castillo

María Coromoto

Yelamo Soto

Bethzaida Gonzalez

Clara Estrada

Dariel Morris

Edicta Nevado

Eric Tomala

Rosa Ocando

Vanessa Moreno

Yaklin Gonzalez

Rebecca Aguirre

Jodr Tavarez

Alexis Tavarez

Alejandra Quintero

Elizabeth Carrillo

Lurimar Cruz

Luis Salcedo

Camila Claudio

Ellien Ortiz

Marnie Ferrer

Alana M Torres
Yahaira Rodriguez-Baez
Lydia Zulema Rodríguez
Carlos Rodriguez
Frederick Collazo
Omayra Rodriguez Rios
Nerza Garcia
Maria Majano
Rose Mukhar