



**To: New York City Council Committee on Children and Youth**  
**From: Ellinor Rutkey, Esq., The Door’s Legal Services Center**  
**Re: Oversight Hearing: Resources for Immigrant Youth Who Arrived to the United States as Unaccompanied Children**

**Date: October 15, 2024**

The Door is a comprehensive youth development organization that has been supporting vulnerable youth in New York City since 1972. Each year, we provide services to nearly 9,000 young people between the ages of 12 and 24, many of them immigrants. The services we provide include healthcare, education, supportive housing, food and nutrition, career development, arts and recreation, mental health counseling, and legal assistance — all under one roof. We are also a Department of Youth and Community Development (DYCD) Runaway and Homeless Youth drop-in center, providing food, clothing, showers, laundry, and case management services to young people who are unhoused or unstably housed. At The Door, we emphasize empowering and engaging the young people we serve, and we are committed to creating a safe, equitable, and inclusive space for young people and staff.

The Legal Services Center at The Door is an office of over 50 individuals, including attorneys, social workers, and support staff. We specialize in serving vulnerable children and young people, including many clients who are unhoused, undocumented, and/or LGBTQIA+. Our attorneys represent youth in removal proceedings before immigration courts, as well as those seeking to regularize their status through the filing of affirmative humanitarian applications. In the fiscal year 2023, we handled 3,282 immigration matters for young people. We also operate several free legal clinics, including a weekly drop-in legal clinic for runaway/homeless youth. The Door is a member of Immigrant Children Advocates’ Relief Effort (ICARE), a coalition of legal advocates dedicated to expanding access to legal representation for immigrant children facing deportation in New York City, while advocating for universal access to counsel.

## **I. Hardships Faced by Unaccompanied Children in ORR Custody**

### ***i. Challenges Within ORR Custody***

At The Door, we work with many young people who entered the United States as unaccompanied children (“UCs”), children who are under the age of 18 and enter the country without their parent(s) – even if they enter with a family member or other adult. UCs are placed in the custody of Office of Refugee Resettlement (“ORR”) in facilities located across the country. The Door is the assigned legal service provider for multiple ORR facilities in New York State. We represent both UCs who are detained and UCs who have been released from detention and live in New York City.

While detained in ORR custody, UCs face a number of challenges. First, UCs report poor language access within ORR shelters. While shelter staff generally speak English, and often speak Spanish, staff very rarely – if ever – speak other languages. Many UCs do not speak

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English or Spanish. For instance, Door staff work with UCs whose first languages are Q'eqchi, Wolof, and Pulaar, along with many other languages. As a result, these UCs are less able to access important information, including information related to their legal case, because staff are not equipped to convey that information in the UC's preferred language. UCs who speak less common languages also report feeling a greater sense of isolation while in ORR custody. These UCs may not have a single person in the ORR facility with whom they can speak without an interpreter. While this degree of isolation would certainly be isolating for any person, it is extremely difficult for children – and especially for UCs, who have been separated from their parents and are living in federal custody without familial support.

Similarly, UCs face isolation while in ORR custody if they lack copies of their identity documents. Generally, UCs have the right to speak with their parents while they are in an ORR shelter. UCs typically rely on their birth certificates to prove the identities of their parents so that they are permitted to speak together on the phone. UCs without a birth certificate will generally need to obtain one from their country of origin's consulate before ORR staff will allow the UC to contact their parents. However, if those consulates are shut down (e.g., due to conflict within the country), the UC will likely be unable to obtain their birth certificate – and thus, be barred from speaking with their parents.

In addition to contributing to isolation and emotional harm, being prevented from contacting their parents may also make it more difficult for UCs to be released from ORR custody. UCs often do not have the name or contact information of family members or family friends who could act as sponsors for the UC in order to allow the UC to be released from the shelter to reunite with family or friends in the United States. If a UC is unable to contact their parents to request that information, the UC might never be able to obtain it, thus forcing the UC to remain in ORR custody for a longer period of time.

An additional challenge faced by UCs in ORR custody relates to ORR's information sharing practices. ORR and its employees are granted broad discretion under federal law. This discretion allows shelter employees to choose how much information, if any, to share with the attorneys who represent UCs while they are in ORR custody. Thus, for Door staff, ORR processes are at best obscured, and at times, completely unknowable. This makes it much harder for Door staff to provide adequate support and services to clients who are in ORR custody.

## ***ii. Release From ORR Custody***

UCs remain in ORR custody until they are released to a sponsor, or they turn 18. ORR designates four categories of sponsors:

- Category I: parents
- Category II: family members
- Category III: unrelated adults
- Category IV: no sponsor



In the past, UCs could be released to Category I sponsors within about a month, and to Category II sponsors in slightly more time than that. However, during the last several months, Door staff have noticed significant delays in UCs being released to Category I or II sponsors. The result of these delays is that children must remain detained in ORR custody for months before being released to their parents or family members.

Category III sponsorship has always been a long and arduous process. ORR staff often expect the relationship between the UC and the sponsor to be well-proven. For example, ORR staff might ask the sponsor or the UC to provide ORR with photos of the sponsor and the UC together to demonstrate that they do in fact have a relationship. Other times, the process is delayed because the sponsor is unable to read necessary paperwork, either because it is only provided to them in a language that they do not understand, or because the sponsor is not literate.

Even if a UC successfully identifies a sponsor, ORR can always use their abundant discretion to reject that sponsor. For example, one Door client wanted a male family member to serve as her sponsor. Because the Door client was a young woman and the family member was a man, ORR required that the prospective sponsor and his roommates go through extra background checks – and eventually, denied his sponsorship of the client. If a sponsorship is denied, there is practically nothing that Door staff can do to cause ORR to reconsider that sponsor.

Category IV sponsorship presents arguably the greatest number of challenges. If a young person is nearing the age of 18 – when they will no longer be able to remain in ORR custody – but does not have a sponsor identified, it is crucial that the UC develop a clear plan of where they will go upon release. Otherwise, the UC risks being released into Immigration and Customs Enforcement (“ICE”) custody.

Pursuant to ORR guidance, shelters are obligated to provide “age out plans” to UCs nearing their 18<sup>th</sup> birthday. In practice, this essentially never happens. ORR does not make any effort to help UCs secure housing, and ORR does not communicate with the advocates of UCs, including Door staff members, so that those advocates can help UCs to plan for their release.

Still, though, in the past, Door staff had found success in facilitating placements for UCs in New York City youth shelters upon their release from ORR custody. This has become significantly more challenging in the past year. Because youth shelters are at capacity, as discussed in greater detail below, Door staff members must jump through hoops to identify alternative potential placements for Category IV UCs. For example, Door staff members have done outreach to mosques, friends of friends, and any other individual or entity that may have a place where the UC could sleep upon their release. In the last year, only a single Door client was able to find placement in a youth shelter upon their release and some have transitioned from ORR detention to adult shelters.

## **II. The Need for More Youth Shelter Beds for Young People Released from ORR Custody and Young People Living Alone in New York**



### *iii. Benefits of Youth Shelters*

Within the DYCD youth shelter system, young people, including UCs leaving ORR custody, are offered both a safe place to live and wraparound services to help stabilize their lives. Youth living in a youth shelter have access to necessary supports, including mental health care, career and education support, medical care, and case management services. They also have access to a plethora of daily activities, ranging from art classes to pickup sports games. Further, but no less importantly, young people within the DYCD shelter system live among their peers. This provides a greater sense of safety and belonging than if the young person had to live among adults within the Department of Homeless Services (DHS) shelter system.

### *iv. Insufficient Capacity Within the DYCD Youth Shelter System*

Despite the myriad of benefits offered to young people within the DYCD system, many young people who have recently aged out of ORR custody are not currently residing in youth shelters. Over the last two years, demand for youth shelters has skyrocketed. This increase in demand comes largely from the high number of recent immigrants to New York – many of whom are eligible to live in a youth shelter. However, there is a significant dearth of shelter beds within the DYCD system.<sup>1</sup> On a daily basis, staff members on our legal services team at The Door speak with youth who have been unable to secure a bed in the youth shelter system. Many of these young people have tried repeatedly to find a bed without any success, constantly visiting and calling shelters in hopes that one will have a vacancy.

If a young person does manage to find a bed in a youth shelter, it is likely due to sheer luck. DYCD providers are so overwhelmed with the demand for shelter that eligible young people are not even being added to a waiting list for a bed – they are simply being turned away. As a result, no amount of patience or time will result in a young person receiving a youth shelter placement.

The limited capacity of youth shelters is not inevitable. With more funding, youth shelters could offer safety and comfort to a greater number of vulnerable young people. Young people would also be more able to access youth shelter beds if recent laws concerning CityFHEPS were implemented. The CityFHEPS Reform Laws were enacted in July of 2023, and pursuant to this legislation, young people in DYCD shelters may obtain CityFHEPS subsidies.<sup>2</sup> Young people could use CityFHEPS to move out of shelters and into their own apartments. With more youth finding long-term housing outside of DYCD shelters, DYCD shelters would have more bed space, and more youth could then move into DYCD shelters. Unfortunately, the Adams Administration has refused to implement the CityFHEPS Reform Laws, depriving young people

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<sup>1</sup> See, e.g., Gwynne Hogan, *Youth Shelter System Locks Out Hundreds as Migrants Seek Entry*, The City (Mar. 12, 2024, 5:00 AM), [https://www.thecity.nyc/2024/03/12/youth-shelter-system-locks-out-young-migrants/?oref=nyn\\_firstread\\_nl](https://www.thecity.nyc/2024/03/12/youth-shelter-system-locks-out-young-migrants/?oref=nyn_firstread_nl).

<sup>2</sup> See *NYC Council Files Appeal Seeking to Compel the Administration to Comply with CityFHEPS Reform Laws & Launches Website Highlighting Rise in Evictions and Homelessness under Mayor Adams*, N.Y.C. Council (Oct. 1, 2024), <https://council.nyc.gov/press/2024/10/01/2706/>.



of their right to CityFHEPS, and contributing to the inability of young people to access youth shelters.

Given the simultaneous unprecedented demand for youth shelter beds and the extreme shortage of those beds, an alarming number of unhoused young people between the ages of 18 and 24 are being placed in Humanitarian Emergency Response and Relief Centers (HERRCs) instead of youth shelters. These young people are eligible for placement in both the DYCD youth shelter system and the HERRC system because of their age. Although youth placed in HERRCs are legal adults, the fact that they are being placed in a HERRC rather than in a youth shelter is cause for serious concern.

#### *v. Young People Placed in HERRCs*

First, young people being placed in HERRCs are in extremely vulnerable positions. Some of them have only just arrived in the United States after a perilous, long, and often traumatic journey from their countries of origin, while others have spent months – or even years – in ORR custody. Even before coming to the United States, many of these young people have already experienced significant trauma in their lives.

For example, one Door client entered the United States as a UC, and on his 18<sup>th</sup> birthday, moved to New York by himself, not knowing anyone who could support him in the United States. Because he lacked a support network in the country, and because there was not a youth shelter bed available for him, he was forced to move into a HERRC. This young person decided to leave his home country in West Africa after years of being hit, whipped, and physically abused by his father. He hopes to attend school in New York – something he had been unable to do in his home country, as his father forced him to work on a farm rather than attend school starting at age 10.

This history of trauma is not the only reason why the UCs being placed in HERRCs are so vulnerable. These young people are also vulnerable because they have essentially no support – in any form – here in New York. For one, many young immigrants do not know anybody when they arrive in the United States, and this is particularly true for UCs released to a shelter when they turn 18. When Door staff members ask these young people about trusted adults that they can turn to for support in New York, the young people almost always tell us that there is no such person in their lives. These young people are thus forced to navigate a new country and culture by themselves and to be their own advocate in the face of barriers. This – coupled with the fact that many of these young people also do not speak English proficiently, and that many have significant gaps in their formal education – makes it exceedingly difficult for young people to access the supports they need if they are placed in a HERRC. Moreover, these young people have essentially no money, and thus, no way to purchase necessary goods and services. And because the young people placed in HERRCs all recently arrived in the United States, most will not be eligible to obtain employment authorization for at least several months – and likely, much longer.



*vi. HERRCs Are Inappropriate Environments for Young People*

HERRCs are not appropriate environments for these vulnerable young people. While DYCD youth shelters are supportive and welcoming environments for young adults, HERRCs are inhospitable and alienating. With thousands of people staying in makeshift tent cities, HERRCs offer little to no privacy for their occupants. This lack of privacy can be especially difficult for young people who need solitude and isolation to process complex trauma. HERRCs also are open to people of all ages, meaning that young people in HERRCs often find themselves among much older adults rather than fellow teenagers and young adults. As a result, many young people say that they have not formed any sort of relationship with their fellow HERRC residents.

An additional reason why HERRCs are not appropriate environments for vulnerable young people is that HERRCs do not supply sufficient food to their occupants. Young people consistently report to Door staff members that they are given barely any food at their HERRCs. While food is a necessity for all people living in shelter, consistent access to nutritious and plentiful food is particularly important for young people whose essential organs, including their brains, are still developing.

Further, HERRCs deprive young people of the opportunity to find safety and stability in New York. For the last few months, youth living in HERRCs have been subject to the unlawful and inhumane 30- and 60-day shelter rules.<sup>3</sup> As a result of these rules and actions, every 30 to 60 days, the young person must uproot their life and find somewhere new to live – without the support of a trusted adult, without money, and usually, without proficiency in English. Moreover, some young people report being given only a few days’ notice that they will need to leave their HERRC, which has caused these young people great fear and panic.

These constant evictions, and the threat thereof, make it all but impossible for newly arrived young people to develop a sense of stability in New York. Young people living in HERRCs report that it is hard for them to make friends and form support networks. It is also hard for these

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<sup>3</sup> On March 15, 2024, the Legal Aid Society announced that it had reached a settlement with the City that would impact the length of time that new New Yorkers are able to remain in shelter. Under the settlement agreement, young people under the age of 23 will be forced to leave their shelter after 60 days rather than 30 days. See Mia Hollie & Annie McDonough, *City Hall and Legal Aid Society Settle Right to Shelter Case*, City & State New York (Mar. 15, 2024), <https://www.cityandstateny.com/policy/2024/03/city-hall-and-legal-aid-society-settle-right-shelter-case/394996/>. While 60-day placements are certainly preferable to 30-day placements, this settlement does not prevent vulnerable young people from being forced to leave their shelter placements. An additional change under the settlement is that HERRC residents may request to remain in their shelter placement at the end of their 30- or 60-day stay, rather than be forced to leave. Stip., ¶ 24, *Callahan v. Carey*, No. 42582/1979 (NY Sup Ct New York Cnty 2024),

[https://iapps.courts.state.ny.us/nyscef/ViewDocument?docIndex=mMvITZFjq\\_PLUS\\_X/RU7jGZrf4Q==](https://iapps.courts.state.ny.us/nyscef/ViewDocument?docIndex=mMvITZFjq_PLUS_X/RU7jGZrf4Q==).

However, these requests will only be granted in the event of “extenuating circumstances,” and the person making the request has an obligation to “take all appropriate affirmative steps to resettle in housing opportunities outside of City Shelters.” *Id.* at ¶¶ 22, 24, App’x A. Particularly for young people who lack a support system and a strong grasp of English, these requirements may prove too burdensome. As a result, vulnerable young people may be disproportionately unlikely to be permitted to remain in shelter at the end of their 30- or 60-day placement. Moreover, many of the details of how exactly these new policies will be implemented are still unclear.



young people to take advantage of community-based resources, like mutual aid groups that distribute food and clothes. By the time that a young HERRC resident learns about a resource in their community, they will only be able to make use of it for at most a few weeks before they are forced to leave that community. Moreover, the threat of constant evictions under the 30- and 60-day shelter rules makes it very difficult for young people to stay in school, which is particularly worrisome when so many of these young people have already experienced interruptions in their formal education.

Unsurprisingly, this indefensible policy has also resulted in many young people sleeping on the streets or otherwise entering dangerous living situations. At The Door, staff members regularly speak with young people who have been removed from their existing HERRC placement and have not been able to find anywhere else to stay. These young people are often forced to develop their own strategies for keeping themselves safe, such as gathering with other newly arrived immigrants and sleeping in shifts. Other young people succeed in finding a place to stay, but at the cost of their own safety. For example, when one newly arrived youth was unable to find a shelter placement, he moved into an apartment with several adults. These adults have coerced this young person into performing unpaid domestic labor, trapping him in an abusive setting. It goes without saying that the living situations that young people face after being removed from a HERRC are extremely dangerous and completely unacceptable as a matter of policy.

If these young people had instead received a bed in a DYCD youth shelter, they would not be subject to the City's cruel 30- and 60-day rules. Rather, following their shelter stay, they would be supported in transitioning to a Transitional Independent Living (TIL) program for up to two years. Thus, for a young person, placement in a HERRC means a cycle of constant threats of eviction, whereas placement in a DYCD youth shelter means long-term services and support.

More broadly, the services offered to young people in HERRCs pale in comparison to those offered to young people in DYCD youth shelters. While young people in HERRCs receive meagre meals and a cot on which to sleep, young people in DYCD youth shelters receive numerous supportive services tailored to their needs. Young people in youth shelters are equipped with the tools that they need to thrive, whereas young people in HERRCs are provided with barely enough to survive.<sup>4</sup> It is absolutely necessary that the City provide more youth shelter beds to house and support newly arrived young people and youth released from ORR custody.

### **III. The Need for Immigration Legal Services for Newly Arrived Unaccompanied Children**

#### ***i. Legal Services Providers Are at Capacity***

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<sup>4</sup> See, e.g., Giulia McDonnell Nieto Del Rio, *NYC Shelter Evictions Keep Migrant Youth From Vital Resources*, Documented (Feb. 16, 2024), [https://documentedny.com/2024/02/16/shelter-evictions-nyc-migrants-minors/?utm\\_source=ActiveCampaign&utm\\_medium=email&utm\\_content=Early+Arrival%3A+Shelter+evictions+keep+youth+from+resources&utm\\_campaign=Newsletter022124+Definitive+-+DNAInfo](https://documentedny.com/2024/02/16/shelter-evictions-nyc-migrants-minors/?utm_source=ActiveCampaign&utm_medium=email&utm_content=Early+Arrival%3A+Shelter+evictions+keep+youth+from+resources&utm_campaign=Newsletter022124+Definitive+-+DNAInfo).



Legal services providers in New York City have never been able to fully meet the demand for free immigration legal help. Though the need for these services is great, there has always been a shortage of free immigration lawyers in the City. Over the last two years, non-profit immigration legal service providers have only become more strained, as the number of individuals seeking these services has skyrocketed and organizations are still dealing with many older cases delayed by the Covid-19 pandemic court closures. Every day at the Door, staff members turn away young immigrants seeking legal support and representation. Our partners representing youth and adult immigrants in New York face this same challenge – we are nearly all at capacity.

In February 2023, The Door’s Legal Services Center formally closed immigration intake to focus on its heavy case load and a waitlist of roughly 400 young immigrants in need of legal assistance. After spending the summer working with our pro bono partners to reach all the young people on our waitlist, we reopened intake at the end of 2023. After a few short months of adding young people to our waitlist, we were again forced to close our immigration intake in July 2024. We currently have over 200 people waiting for an initial legal screening and over 100 young people eligible for immigration relief on our waitlist.

Moreover, our weekly drop-in legal clinic for runaway/homeless youth has been busier than ever. Prior to 2023, the clinic saw zero to one person each week. Now, clinic staffers routinely speak with up to 25 people over the course of an hour and a half, nearly all of whom are new New Yorkers looking for immigration legal services, and several of whom are UCs. The need and demand for services grows every week and we do not have enough capacity to keep up.

## *ii. The Importance of Free Legal Services for Young Immigrants*

While UCs receive free legal representation while in ORR custody, that representation may not necessarily continue depending on where they are released. Now more than ever, it is vital that young immigrants receive free, competent and comprehensive legal services. Door staff members have noticed that immigration hearings are being scheduled particularly quickly, leaving young people with even less time than usual to find a lawyer. Given these time constraints, and the overall shortage of free immigration lawyers, many young immigrants have been entirely unable to find legal assistance. In a recent survey of new immigrants, only six percent reported having found an immigration lawyer to represent them.<sup>5</sup> This is entirely unacceptable.

A great proportion of those young people have strong legal cases. Many of the young people that The Door turns away should ultimately be found eligible for legal relief, including Special Immigrant Juvenile Status (SIJS) and asylum. Without a lawyer, though, it can be difficult – or even impossible – for a young person to successfully apply for and obtain relief.

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<sup>5</sup> *Leaving Behind the Newest New Yorkers*, Make the Road New York et. Al., 1, 11 (May 2024), <https://maketheroadny.org/wp-content/uploads/2024/05/2024-Asylum-Survey-Report.pdf>.





The risks to a young person who is not able to find a lawyer are significant. First, UCs are in removal proceedings, meaning that they risk being removed to the very country that they fled to get here. What's more, we have seen a number of young people who have been ordered removed *in absentia*. This occurs when a young person misses their hearing date, often through no fault of their own. These young people are often fleeing horrific situations, and for many, being returned to their home country could be deadly.

While there are resources available to young immigrants who are unable to find lawyers, these are insufficient. Resources like the Red Cross Asylum Application Help Center do not provide an adequate level of services to immigrants in need, especially young immigrants. Several young people have reported to Door staff members that the Asylum Application Help Center made significant errors in their asylum applications. For example, one young person reported that the asylum application he completed at the Help Center indicates in several responses that he lived in a country that he has never even visited. In addition, the Help Center has failed to identify young people who arrived as UCs and has erroneously filed UCs' asylum applications with the immigration court rather than USCIS. This is a serious issue because UCs have the right to have their asylum application first adjudicated at an asylum office, and the errors made by the Help Center deprive an especially vulnerable subset of youth of this right.

Further, for some young people, accessing asylum application assistance at the Red Cross has arguably undermined their stated goals. On a daily basis, young people tell us that their primary goal is to receive their work permit so that they can support themselves here in New York. Because an immigrant can apply for a work permit 150 days after filing an asylum application, these youth often end up submitting pro se applications at the Help Center while they continue to look for an attorney to represent them. Once the application is filed, the 150-day clock starts. But if that asylum applicant then has an immigration court appearance where they ask for an adjournment – a necessary step for immigrants still searching for lawyers – the 150-day clock stops until the applicant's next immigration court appearance. Given how busy the immigration courts have been, that next immigration court appearance could easily be more than six months away. As a result, many pro se asylum applicants will end up waiting even longer to receive their work permit than they would have had they not filed a pro se asylum application so quickly and before they could possibly find representation. Unfortunately for these applicants, neither the Red Cross nor the immigration courts are consistently informing asylum applicants of the clock-stopping effect of adjournments.

Even when resources like the Red Cross Asylum Application Help Center do not actively undermine a young person's goals, these resources are not equipped to provide young people with the level of support they need to navigate their immigration cases. Although these resources can help young people to submit immigration applications, they are not equipped to provide support to young immigrants before or after the application is filed. And particularly for UCs involved in immigration court, legal support that falls short of full representation is simply not adequate – especially when these young people are at risk of being removed from the United States. Young immigrants need comprehensive legal services, and it is necessary for the City to provide funding to hire more immigration lawyers.

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#### **IV. The Need for Specialized Legal Services for Unaccompanied Children and Young People Living in Shelter**

In addition to the immense need for the City to provide funding to hire more immigration lawyers, there is also a substantial need for funding for specialized legal services to provide full representation for young people living in shelter, including UCs.

For one, there is a need for specialized immigration legal services for young people living in shelter. As discussed, youth living in shelter are in particularly vulnerable positions and lack crucial supports to help them navigate their new lives in New York. Yet, because there are not enough immigration lawyers to meet the great need for immigration legal services, many of these especially vulnerable young people are left without stable housing *and* without a lawyer. We have seen several young people who were ordered removed in absentia after missing their court date, which occurred because they did not receive their court notice. Because unstably housed young people are forced to move around so often, this group is more likely to lack a stable place to receive mail, and thus, is at greater risk of missing a court appearance and being ordered removed.

Despite the heightened needs of young people living in shelters, there is reason to believe that this group is less likely to find lawyers than their peers who are housed or who are living in youth shelters. Door staff members find that Door members living in HERRCs are disproportionately likely to still be in search of an immigration lawyer compared to all other Door members. Funding specialized immigration legal services for young people living in shelter could help bridge this gap and address some of the vulnerabilities of newly arrived New Yorkers.

Further, there is a need for specialized non-immigration legal services for young people living in shelter. The relevant law and policy around shelter access in New York is complex and ever-changing. The vast majority of service providers who work with people in shelter are not well-versed in these rules and are not able to competently advise shelter residents on their rights and responsibilities.

As a result, shelter residents are forced to navigate an ever-changing and confusing system on their own, without adequate legal support. This leads to the erosion of rights and protections for shelter residents. For instance, Door members living in HERRCs have been erroneously told that they must leave their shelter and cannot return to the shelter system at all. Had a Door attorney who specializes in shelter access not become aware of this issue, impacted Door members would have left their shelter and, with nowhere else to go, would have begun sleeping on the streets.

When rights violations like these occur, it is essential to have a well-developed legal support system in place. Trained attorneys can both inform shelter residents of their rights and can advocate for shelter residents if their rights are infringed upon. This will be particularly important in the coming months, as the City begins to implement a new extension request system



that requires that a shelter resident demonstrate extenuating circumstances in order to remain in their shelter placement. When residents inevitably have their requests improperly denied, they will need competent legal advice and representation to ensure that they are not forced out onto the streets. The City can help prevent this awful outcome by funding specialized non-immigration legal services for shelter residents.

## **V. Conclusion**

Young people released from ORR custody without a sponsor need access to the safety, stability, and services offered in youth shelters. If the City does not increase funding for the DYCD shelter system, already-vulnerable youth will be left to navigate a constant cycle of evictions and the difficulties of young adulthood – all without any meaningful source of support. Thus, I urge New York City to fund additional DYCD youth shelter beds.

Young people without legal status, and especially those designated as UCs, also need access to free immigration legal services. Existing pro se models, like the Red Cross Asylum Application Help Center, are not appropriate for this vulnerable population. If the City does not provide funding to remedy the current shortage of legal services providers, an unacceptable number of young people who are eligible for immigration relief will not receive necessary legal help. The probable result is that many of these young people will be ordered removed to a country where their wellbeing – and sometimes, lives – will be at risk. Therefore, I urge New York City to fund youth-specific, no-cost immigration legal services, and to provide sufficient funding to collaboratives and organizations who represent UCs in removal proceedings.

Finally, young people living in shelter, including many UCs upon their release, need access to free, specialized legal services. If the City does not fund legal services for young people living in shelter, youth who already face great difficulties in vindicating their rights will continue to experience rights deprivations, including deprivations that result in street homelessness. Thus, I urge New York City to fund shelter-specific, no-cost legal services.

Thank you.

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