

To: NYC Council Committees on Immigration, Finance, and Criminal Justice From: Grace Day, Esq., Staff Attorney, The Door's Legal Services Center, and

Lora Adams, Legal Program Manager, Detained Minors Project at The Door

Date: May 27, 2025

Re: Executive Budget for FY 2026 and the Executive Capital Plan for Fiscal Years 2025-2029

The Door is a comprehensive youth development organization that has been supporting young people in New York City since 1972. Each year, we serve nearly 9,000 youth between the ages of 12 and 24, many of whom are immigrants. At The Door, young people can access primary and reproductive health care, mental health services, legal assistance, college preparation, career development, housing supports, arts, sports and recreational activities, and nutritious meals – all for free and in a diverse and caring environment. Serving as Manhattan's designated daytime Runaway and Homeless Youth Drop-In Center, and the Bronx's only 24-7 Drop-In Center, we also provide food, clothing, showers, laundry, and case management for youth who are unhoused or experiencing housing instability.

Through our integrated approach, we provide New York City youth with space to overcome their barriers, maximize their potential, and thrive as they transition into adulthood. We prioritize youth empowerment and engagement and are deeply committed to fostering a safe, equitable, and inclusive environment for both young people and staff.

Our **Legal Services Center**¹ is staffed by over 60 professionals, including attorneys, social workers, and support personnel, and focuses on serving vulnerable young people—many of whom are undocumented, unhoused, and/or LGBTQIA+. Our legal team represents youth in immigration court and helps them pursue humanitarian immigration relief through affirmative applications. In 2024 alone, we handled more than 3,300 immigration matters.

To meet the growing demand in the city, we also operate several free legal clinics, including a weekly drop-in clinic primarily serving recent arrivals who are unhoused or housing insecure. However, the need continues to outpace our resources. Most young people screened through our clinics are eligible for some form of immigration relief, but we lack the capacity to provide full legal representation for each of them. Without legal counsel, it is extremely difficult—if not impossible—for a young person to navigate the immigration system on their own.

Legal Services Under Attack by the Current Federal Administration

On March 21, 2025, The Door was notified of an immediate, near-total termination of services under the Unaccompanied Children Program (UCP), a vital initiative that provides legal support and representation to minors who entered the United States alone. Over 80 organizations across the country rely on this program to represent over 26,000 young people. The Door's UCP contract accounts for \$4.6 million and over 60% of our Legal Services Center's funding. As a result, The Door had to issue layoff notices to nearly 20% of its workforce.

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¹ https://www.door.org/legalservices/



Unaccompanied children enter the country without a parent or legal guardian. Some made the trip to the United States alone, some traveled with adult strangers, others with an older sibling. Some of the children have children themselves. Our program's clients average 11-15 years old, though our youngest is a baby of six months. Most do not speak English, and all are expected to navigate the immigration legal system to either attain legal status or face deportation by the federal government. Most of these children qualify for asylum or another visa meant for abused or abandoned children, but they must apply and make it through immigration court to access that protection. It may be common knowledge to this committee that there is not a right to an attorney in immigration court if you cannot afford one—what may be less known is that this also applies to children.

Congress mandated that unaccompanied children be an exception to this rule, and funding through the UCP program has allowed us to accompany these children through their legal process and post-release to a safe adult sponsor. This contract allows us to support children in the most vulnerable of situations, often alone in the United States. With this funding, we are able to reach these children and give them the legal representation they deserve. For those that we cannot represent directly, we accompany them to each immigration court hearing as a Friend of Court. We are also able to use The Door's supportive services to give kids a chance to thrive—the emotional support of social workers, advocates who care about their holistic well-being, and physical support for housing, educational, health, and food resources after release from federal detention.

While our team resolved to continue representing the current clients in our care for as long as possible after the contract's termination, all arriving children were cut off from all but the most basic legal services. We were forced to freeze our Friend of Court services.

Five days after the termination, we had our first visit with our former clients at a government shelter in Westchester County. We had been there a week before to inform newly arrived children of their rights and to let them know that we would be there for them throughout this legal journey. That day, we sat them down and let them know that we could not be with them at court next week. They would unfortunately be going alone. We had a mix of reactions—fear, silence, bravado. One boy raised his hand and asked about the right to an attorney we had taught him just last week, looking at his little sister. We assured him he did indeed have that right, but we were not able to be that attorney anymore. We walked the children through the court basics—what a judge looks like, what kinds of questions they might ask, and how they don't have to pretend to know the answers if they don't understand.

On April 1st, a federal court in the Northern District of California issued a temporary restraining order stating that the federal government must restore funding to the UCP contract as the issue is litigated, citing the immediate harm to children caused by the funding loss. For four weeks, we remained unfunded as we watched the federal government stall and refuse to comply with the judge's order. The Door decided to rescind the layoff notices for our Legal Service Center staff while this matter evolved; however, our colleagues in other organizations laid off up to 80% of their staff that month.



On April 30th, a federal court in the Northern District of California issued a preliminary injunction, stating that the federal government must restore funding to the UCP contract as the issue is litigated. After nearly six weeks, we were notified that our UCP contract would be reinstated until September 29, 2025. While this is a hopeful development, the federal government has the ability to appeal this decision and this does not account for the weeks between the contract termination and the reinstatement, a period for which it is still unclear whether we will receive any payment. Further, the future of our Legal Services Center and that of thousands of unaccompanied minors beyond September still hang in the balance as they rely on the uncertain continuation of this crucial funding.

It has become clear that the executive branch will do all in its power to have as few people represented in immigration court as possible, even if it means forcing children to show up to court rooms alone. Of course, young children are unable to understand the complexities of ever-changing immigration law and effectively argue the merits of their cases. They do not know what statuses they may qualify for, what the standards are, what evidence they need to bring to the table, some of them are so young they are unable to speak full sentences.

Children with representation in immigration court are seven times more likely to access immigration relief.² Therefore, as we fight the uphill battle that the next four years will bring, we ask for the support of the City Council. In the face of a federal administration that is committed to targeting and terrorizing immigrant communities, our city can use our resources to defend these communities and protect children. We ask that in response to the administration's attack on unaccompanied children's legal representation, the city stands in the gap and grants \$5,400,000 in emergency funding to legal service providers to mitigate the loss of UCP funding.

As a founding member of the Immigrant Children Advocates' Relief Effort (ICARE) coalition, The Door has been the recipient of discretionary funding through the Unaccompanied Minor Children and Families initiative for over a decade and has graciously been awarded funding through the newer Welcome NYC initiative since it was established. These are critical sources of support that enable us to deliver comprehensive wraparound services to immigrant youth—direct legal representation, Know Your Rights trainings, legal clinics, and brief services to triage and prioritize urgent cases.

However, ICARE has not seen a funding increase in six years. We urge the City Council to fully fund ICARE at the coalition's requested amount of \$6,297,250. Of that total, The Door would receive \$900,000 to continue strengthening our capacity to provide effective, comprehensive, and zealous legal representation to immigrant youth.

Additionally, we call for your support of The Door's expanded request of \$50,000 through the Welcome NYC initiative, and its new request of \$50,000 through the Immigrant Opportunities Initiative. We hope to continue relying on the City Council's support for these vital services.

² https://vera-institute.files.svdcdn.com/production/downloads/publications/representation-matters.pdf



This funding has allowed for us to respond rapidly to the changing times and offer protection and safety to immigrant youth in New York City. Funding from the City Council has been transformative, enabling us to directly represent immigrant youth while supporting our broader wraparound services. This support has changed the lives and futures of many vulnerable young people, and we sincerely hope for your continued partnership as we work to serve the youth who depend on us most.

Thank you for your time and consideration,

Grace Day, Esq.

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