

ORAL STATEMENT FOR UUSC

Before the Texas Commission of Family and Protective Services

Austin, TX

December 9, 2015

The Unitarian Universalist Service Committee strongly objects to the State of Texas issuing childcare licenses to Immigration and Customs Enforcement (ICE) immigrant family detention centers. For your consideration, we are submitting a longer statement documenting our objection to granting the licenses, along with our recent professional mental health study assessing the impact of the centers' policies, practices and personnel on detained mothers and children, and a letter signed by 31 national mental health experts opposing such licensure as further evidence.

The purpose of the family detention centers at Karnes City and Dilley, Texas, has been to hold families in custody while they undergo immigration and asylum proceedings. Guards and other detention personnel have a specific role to play with specific competencies and requirements. Their training, temperament, and policies are antithetical to those of childcare professionals. In fact, our research documents abuses and human rights violations families face in these facilities. These cannot be remedied by the proposed rule.

The provisions and exceptions in the proposed rule make it clear that this change in the State of Texas's child care regulations is not well thought out, but rather is a last-minute attempt to make the detention centers conform to the *Flores* agreement. This tries to legitimize the detention of children, when the federal courts have deemed it unacceptable.

We urge you not to issue any child care licenses to ICE's family detention centers and to abandon the proposed rule change.