

DIGNITY, COMMUNITY, & POWER:

A 2021 Vision for NYC's Immigrant Communities



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**MAKE THE ROAD
NEW YORK**

DIGNIDAD, COMUNIDAD Y PODER

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EXECUTIVE SUMMARY

New York City faces a pivotal election year that will determine its leaders, including the next mayor, city comptroller, and City Councilmembers from all 51 districts, for the next four years. These electoral contests will offer city government an opportunity to demonstrate its commitments and how it will devote resources to a host of programs and services that have a direct, immediate effect on immigrant communities—communities that have long been vital to the growth and very fabric of our city, but also long subjected to systemic discrimination, inequity, and exclusion. As candidates move forward in the 2021 electoral process, they must take a bold stand and formalize their commitment to the rights and needs of immigrant New Yorkers, who are a driving force of our resilient city and who urgently need support at this unprecedented moment.

This white paper—Dignity, Community, & Power: A 2021 Vision for NYC’s Immigrant Communities—outlines this bold and vital agenda. It provides a broad range of recommendations from working-class immigrant New Yorkers that mayoral and other candidates should incorporate into their platforms. While New York City is often considered a model city in terms of offering protection and support to its immigrant residents, our immigrant communities’ experiences have shown that, in reality, the City can and must do more. This white paper proposes a number of ways in which New York City can take critical steps to protect immigrant community members, ensure durable rights, and provide models for progressive cities and states around the nation. For example, by pioneering models to hold local law enforcement officers accountable when they work with federal immigration enforcement, supporting initiatives that provide access to counsel for immigrants facing deportation, and expanding the bounds of unemployment programs for workers, incoming elected officials can steer our city towards innovation, safety, community empowerment, and inclusive growth. This white paper then focuses on entrenched problems that make it difficult or impossible for immigrant community members to live safe and healthy lives, and steps that the City must take to ensure access to these basic survival rights. Through this framework, the City’s next leaders can make a transformational impact on the lives of immigrant New Yorkers and the City as a whole, and they can lead other cities across the nation in supporting immigrant communities.



Overarching Recommendations:



Access to Voting

Expand voting rights in municipal elections to include noncitizens—regardless of immigration status—and individuals who were previously incarcerated as a result of felony convictions and are on parole; ensure that the voting process in municipal elections is accessible to all New Yorkers; and prioritize voter education.

- Pass Legislation Expanding Voting Rights, Including by Eliminating Any Requirement of Citizenship or Immigration Status.
- Expand Access to the Polls by Modernizing the Election Process.
- Implement a Targeted Public Education Campaign to Increase Civic Engagement.



Disentanglement of Local Law Enforcement and Federal Civil Immigration Enforcement

Commit to drawing a clearer line between City functions and federal immigration enforcement; promote genuine transparency in the City's interactions with the Department of Homeland Security (DHS); and ensure that the public can hold local law enforcement accountable for violations of the City's disentanglement laws.

- Completely and Clearly Prohibit Local Law Enforcement Agencies from Supporting Federal Immigration Enforcement Actions.
- Mandate Rigorous Public Reporting.
- Create First-of-their-Kind Enforcement Mechanisms to Allow the Public to Hold Local Law Enforcement Accountable for Violations of the City's Disentanglement Laws.
- Limit Interactions Between Local Law Enforcement and Immigrant Communities.
- Ending Transfers to ICE.



Access to Counsel for Immigrants Facing Deportation

Foster and support access to legal representation for noncitizens facing deportation.

- Foster and Support Access-to-Counsel Initiatives for Noncitizens Facing Deportation.
- Maintain Funding for Crucial Counsel Programs that Keep Immigrant Families and Communities Together.



Healthcare

Create a healthcare platform that ensures community-centered programs to enhance access to health care, emergency food assistance, and treatment-focused responses to mental health needs.

- Provide Sustainable Funding for Community-Based Organizations to Conduct Outreach and Education to Immigrant Communities.
- Ensure Sustainable Municipal Funding for Community Health Workers.
- Increase Funding for Emergency Food Assistance Programs.
- Create and Fund Non-Police Response to Mental Health Emergencies.



Housing

Create a community-centered housing agenda that ensures all New Yorkers have access to long-term, safe, and affordable housing free from poor conditions and landlord harassment.

- Create an Integrated Housing Plan that Prioritizes Long-Term, Needs-Based Solutions Over Numbers.
- End Housing Segregation and Improve Access to Affordable Housing.
- End Real Estate Speculation by Supporting Local Owners.
- Ensure Housing Quality for All New Yorkers.
- Center Local Knowledge in Planning Decisions.



Workers' Rights

Create an action plan that expands relief for all workers who have lost some or all of their income and provides support and services to protect workers from wage theft and abuse.

- Launch an Unemployment Insurance Equivalent Program and Ensure Access to City-Run Relief Programs for Excluded Immigrants.
- Increase Funding for Legal Services for Workers Subject to Wage Theft and Abuse in the Workplace.
- Leverage Municipal Power as Market Participant to Disincentivize Forced Arbitration Clauses and Other Nefarious Employer Practices.
- Implement Legal Protections Against Firing Workers Without “Just Cause.”



Adult Literacy, Job Training, and College Access

Promote English language acquisition, higher literacy levels and educational attainment for all New Yorkers through the expansion of adult literacy and college access programs.

- Significantly Increase Funding for Adult Literacy Programs to Serve the More than 2.2 Million Adults in New York City who Lack a High School Diploma, English Language Proficiency, or Both.
- Utilize Adult Literacy Programs as Empowerment Hubs for Know-Your-Rights Campaigns and Information.
- Remove Work Authorization Requirements from Job Training Programs to Allow Students to Participate Regardless of Immigration Status.
- Increase Funding for and Expand Access to College Access Programs and Summer Youth Employment Program (SYEP) to Include Undocumented Youth.



INTRODUCTION

The COVID-19 pandemic has created devastating economic impacts for New York City residents, with restaurants and small businesses closing and breadwinners suddenly without paychecks to put food on the table. While it is still too early to tell the full extent of its impact on New York City's 3.1 million immigrant community members,¹ it has already become brutally clear that the pandemic—coupled with exclusionary federal and state policies—has exacerbated an already dire and deeply inequitable situation for immigrants and mixed-status families. Immigrant, Black, and brown communities were marked by inequity well before this pandemic, but this crisis has laid bare the magnitude of this problem. The very people who have sustained our city and served as frontline and essential workers have been shut out of critical housing, health, employment, and educational supports, and now live on the brink.²

The City must step in to ensure that immigrant New Yorkers are not systematically excluded from the collective effort to recover and rebuild and to guarantee equal access to the basic human rights necessary for them to survive, grow, and thrive.

“Dignity, Community, & Power: A 2021 Vision for NYC’s Immigrant Communities” lays out a visionary and vital plan for the new leaders who seek to heal and build back a more equitable and inclusive New York City.



This white paper focuses on New York City's immigrant community, a large and important part of the City, and one that has been impacted particularly severely by COVID-19. Immigrant New Yorkers—especially those who are undocumented—have been hit hardest by unemployment during the pandemic; while they previously were employed at greater rates than U.S.-born New Yorkers, they now face a higher unemployment rate than their U.S.-born counterparts.³ While these job losses have affected many across the nation,



the pandemic's impact on immigrant communities has been especially pronounced: immigrants are often uniquely shut out of critical federal and state programs—from unemployment insurance to rent relief to cash assistance to health care coverage—that sustain and support their U.S.-born neighbors during these difficult times.⁴ And the data make clear that immigrant New Yorkers are not getting the help they need: a May 2020 survey of immigrant communities conducted by Make the Road New York (MRNY) found that 92% of respondents had at least one member of their household lose their job or income since the pandemic began, but only 5% received unemployment benefits and a mere 15% reported receiving government assistance of *any* kind.⁵

In short, the message to the City's immigrant communities has been they are good enough to clean, deliver food, and even provide care for those who are sick, but do not deserve basic human rights such as adequate housing, food, workplace protections, and healthcare.

Recognizing that immigrant New Yorkers confront unique challenges—threats that preceded the Trump Administration and will follow it as well—this white paper first proposes a number of ways that New York City can take bold action to protect immigrant community members, ensure durable rights, and provide models for progressive cities and states around the nation.

New York City now has the opportunity to right a longstanding wrong that has denied critical community members—indeed the very people who have sustained our City during the COVID crisis—a voice in municipal government. At present, noncitizens and certain people who have interacted with the criminal legal system are prohibited from voting, and therefore from having any say in the policies that govern them. *Dignity, Community, & Power: 2021 Vision for NYC's Immigrant Communities* demands that the City eliminate these exclusionary and inequitable voting restrictions, modernize the election process, and invest in public education to ensure that previously disenfranchised communities have a voice in our city.

The City can protect and empower immigrant communities by drawing a clearer line between City functions and federal immigration enforcement and limiting the presence of local law enforcement in immigrant communities. It should commit to genuine transparency in its interactions with DHS. And it can create first-of-their-kind public accountability mechanisms that ensure that the community can hold the New York Police Department (NYPD) and other municipal law enforcement accountable when an officer—or the City itself—steps out of bounds in collaboration with ICE.



New York City can also make profound changes for New Yorkers facing deportation. The City is a leader in access-to-counsel initiatives for individuals facing removal, and these programs are all the more critical when, as now, immigrant communities are so severely financially impacted by the pandemic. As this white paper explains, the City must continue on this pathbreaking trajectory by continuing to foster and support access-to-counsel initiatives for individuals who face removal and maintaining funding for other critical counsel programs.

Given that the fallout from COVID-19 has disproportionately impacted immigrant communities and intensified existing inequities, this white paper next focuses on entrenched problems that make it difficult or impossible for immigrant community members to live safe and healthy lives, and the steps the City must take to ensure access to these basic survival rights.

Long entrenched health inequities such as inadequate access to healthcare, for example, have worsened as COVID-19 rates have soared in the City. This current crisis has shown all too clearly the devastating effects when immigrant New Yorkers are forced to confront a complex and overburdened health care system without adequate assistance to guide them through critical questions like financial costs and the immigration-related risks of seeking medical care and public benefits, such as the concerns created by the recent federal public charge rules. As *Dignity, Community, & Power: 2021 Vision for NYC's Immigrant Communities* explains, the City must provide sufficient resources for the vital community-focused programs that connect immigrant New Yorkers with safety-net health programs, increase funding for community food assistance, and ensure that people with mental health needs are provided care rather than criminalization.

Housing insecurity also permeates immigrant communities struggling to make ends meet every month. These communities face harassment by abusive landlords, dangerous housing conditions, and related displacement from quickly-gentrifying neighborhoods with skyrocketing rents. *Dignity, Community, & Power: 2021 Vision for NYC's Immigrant Communities* demands that the City create and implement an integrated, inclusive, and equitable housing plan that prioritizes long-term, needs-based solutions to improve access to affordable housing and to ensure that no one is displaced due to poor housing conditions or harassment.

Inadequate support for immigrant workers also threatens the very survival of the City's immigrant communities. Our current recession has not only made it clear that immigrant workers are critical to our workforce, but also uniquely vulnerable to economic crises due to



job loss, increased wage theft, and other forms of employer discrimination. This white paper outlines an action plan for the City to provide support that these workers need and deserve, including launching an unemployment insurance equivalent program, addressing gaps in financial relief and access to legal services, and leveraging the City's power as a market participant to disincentivize employers from engaging in unfair labor practices. It also lays out a blueprint for how the City can promote adult literacy, job training, and college access programs to ensure financial stability and growth in the community as a whole.

Ultimately, the City must take bold action to advance the rights of immigrant community members in New York City and beyond and to ensure that its immigrant community members are not denied the basic human rights necessary for their survival and growth. This white paper explains how.



Access to Voting for All New Yorkers



As New York City rebuilds its way out of the COVID-related recession, we will be guided by its constituents' voices in directing resources and crafting policies and programs that will lay its new foundations. The loudest and most time-honored way for constituents to participate in this process comes from voting in municipal elections. However, many New Yorkers—in particular many immigrants—who have long played critical roles in our city life are now ineligible to vote and excluded from this process. Despite their longstanding role as essential health and service workers who keep our city safe, healthy, and supported, many immigrants cannot directly influence city policy through electoral politics. Indeed, undocumented immigrants alone contributed over \$1.4 billion in state and local taxes in 2018, and comprised over 5% of the City's workforce,⁶ yet are deprived of representation in their local government. Similarly, New Yorkers who were previously incarcerated for felony convictions and are on parole are also barred from voting, a form of disenfranchisement that disproportionately prevents people of color, especially Black and Latinx individuals, from participating.⁷

In addition, because the congressional gridlock on immigration reform has left many longtime New Yorkers with no path to citizenship, they have been denied any means of participating in local government. While local leaders have called for Congress to create pathways to citizenship, the City need not wait for the federal government to use its own authority to ensure the democratic inclusion of noncitizen New Yorkers.

Expanding voting rights to permit New Yorkers to vote, regardless of immigration or parole status, will center and amplify the voices of those with a deep stake in their communities and an important role in the City as whole. By enfranchising these New Yorkers, the City would give many more New Yorkers a voice in civic governance, end the inequitable exclusion of these important community members, and increase civic engagement. To make voting accessible and inclusive, the City should adopt the following recommendations:



#1

Pass Legislation for Expanded Voting Rights

The City should pass legislation that permits people to vote in municipal elections regardless of their immigration status or any prior involvement with the criminal legal system. Eliminating current voting restrictions such as the requirement of U.S. citizenship



will allow critical community members to play their important and rightful role within the city they call home. In so doing, New York City should follow the lead of cities like Takoma Park, Maryland, which removed citizenship voting requirements altogether, thus allowing both documented and undocumented immigrants to vote in local elections.⁸



#2

Expand Access to the Polls by Modernizing the Municipal Election Process

In order to hold free and fair elections accessible to the voting electorate in New York City, the City must modernize the voting process for municipal elections. To expand access to the polls, the City should remove barriers to voting by taking the following steps:

Implement Ballots on Demand & Vote Anywhere. Ballots on demand should be used instead of pre-printed paper ballots, the vast majority of which are never used. Ballots on demand technology, coupled with existing electronic poll books, would enable poll workers to print individualized ballots upon registration and allow New Yorkers to vote at *any* polling site instead of a specific polling site. The City should also expand the ability to vote anywhere in municipal elections by implementing early-vote drop-off ballot boxes at early polling places, board of elections offices, and other community spaces that can serve as voting sites.⁹

Maintain Current Absentee Ballot Procedures. The COVID-19 pandemic forced New York to ease the process of casting absentee ballots to make it easier for residents to vote without risk or fear of illness.¹⁰ The reforms implemented by the state included extending the amount of time voters have to request absentee ballots and extending the acceptable timeframe for which mailed ballots must be accepted.¹¹ The result was a record-breaking turnout and an unprecedented number of absentee ballots cast in the November 2020 election.¹² Most of New York's sweeping reforms, however, are only in effect until January 1, 2022, and others already expired at the end of 2020.¹³ The City should make these into permanent reforms that expand voter access for future municipal elections, thereby encouraging the state to follow suit.

Permit No-Fault Absentee Ballots. Right now in New York, voters must provide a valid reason for requesting an absentee ballot, like being out of the county on Election Day or suffering a temporary illness. Last year, the state temporarily expanded the definition



of illness to include the risk of contracting or spreading COVID-19. The City should allow residents to cast no-fault (also known as “no-excuse”) absentee ballots in municipal elections, in which voters may request an absentee ballot without stating a specific excuse or reason. Adopting no-fault absentee ballots would help expand access to voters who are unable to vote on Election Day, and set an example for the state.



#3

Launch A Three-Year Targeted Public Education Campaign to Increase Civic Engagement

It will take more than new systems to drive up participation rates and change the culture of voting in New York City. The City must affirmatively create a culture of civic participation by investing in a three-year public education campaign that targets formerly disenfranchised communities to promote awareness of their newly expanded voting rights. The City should do this by leveraging its existing partnerships with community-based organizations (CBOs) and funding CBO outreach in underserved communities. The City should also use its power as a market participant to incentive corporate partners to adopt policies such as paid Election Day holidays to promote greater voter turnout.



Safety Through Limiting Immigrant Community Interaction with Law Enforcement



While the fallout from COVID-19 has taken a heavy toll on immigrant communities in New York City, the pandemic is not the only threat to their freedom and wellbeing. Aggressive immigration enforcement and policing has sown fear in these communities and, all too often, separated families. The City, to its credit, has long been a leader in creating models for municipalities seeking to disentangle local law enforcement functions from federal civil immigration enforcement. However, despite the City's laws generally prohibiting local law enforcement from collaborating with ICE¹⁴ for purposes of federal civil immigration enforcement, reports have indicated that the NYPD and other local law enforcement agencies are nevertheless supporting ICE in certain ways, whether by actively participating in arrests, offering back-up support for ICE enforcement actions, or playing a less clear role at the scene.¹⁵ And just recently it was revealed that the Department of Correction transferred a young man into ICE custody in violation of the city's disentanglement law.¹⁶ At least as problematic, neither the NYPD nor any other City agency makes the full scope of information about these interactions public, and there is no independent agency or actor playing an oversight role in regard to the implementation of these laws. These reports of local law enforcement's collaboration with ICE and the lack of transparency raise significant questions about the extent to which the City continues to collaborate with ICE to further civil immigration enforcement.

This problem—and the fear that reports of this collaboration sow in immigrant communities—is compounded by the absence of mechanisms to hold NYPD and other municipal law enforcement officers accountable for violations of the City's disentanglement laws. This leaves the community and victims of these violations with little hope for redress when the NYPD and other law enforcement officers collaborate with ICE, and unable to prevent it from happening again. Lastly, limiting police presence in immigrant communities will reduce the risk of a triggering event that leads to later immigration enforcement.

The City should take the following steps towards completely divesting from policing in immigrant communities (and in communities of color more broadly), disentangling local law enforcement agencies from federal civil immigration enforcement, and empowering our communities to take action if and when those lines between the police and ICE are crossed.



#1

Completely and Clearly Prohibit Local Law Enforcement Agencies from Supporting ICE Immigration Enforcement Actions

While current municipal law prohibits New York City law enforcement officers from working with ICE in many circumstances, it nevertheless permits the NYPD and other city law enforcement agencies¹⁷ to work with ICE in some respects. For example, City law enforcement can work with ICE and other federal law enforcement agencies in the context of cooperative arrangements so long as they are “not *primarily* intended to further immigration enforcement.”¹⁸ In addition, local law does not prohibit municipal law enforcement from working with DHS on matters that do *not* further civil immigration enforcement,¹⁹ and the City has concluded that municipal law permits it to work with ICE where it identifies a “public safety” need.²⁰ Moreover, recent reports of the NYPD and ICE working together in connection with ICE’s enforcement actions have revealed a troubling lack of clarity about the extent to which the NYPD has and/or believes it can provide some form of support to ICE during civil immigration enforcement actions. Given this, the City should draw a clearer line between the local law enforcement and immigration enforcement by:

Eliminating the Cooperative Arrangement Exception. The past four years have demonstrated like never before the brutality and lawlessness that permeate DHS and made it clear that DHS—and ICE in particular—cannot be relied upon to adhere to limits. New York City must fully disentangle itself from cooperative arrangements with DHS. The City should follow the lead of other cities that have done away with cooperative arrangement exceptions altogether.²¹

Prohibiting Any NYPD Support for ICE Enforcement Actions. Given recent reports of the NYPD providing assistance for ICE enforcement actions in the name of public safety,²² the City should come into compliance with existing law: the NYPD should not be involved in facilitating ICE enforcement actions and public safety will not be accepted as a pretext. The City should make clear at every opportunity, including through the NYPD patrol guide and training for officers, that ICE alone is responsible for adequately staffing its own enforcement actions and avoiding the creation of public safety concerns.

Taking Action Against ICE “Ruses” Impersonating the NYPD. Ruses²³ are a direct affront to the City’s efforts to disentangle itself from immigration enforcement. The City must



take strong and bold action to prevent these deceptive enforcement tactics, including through community education, advocacy with federal officials, and, if need be, changing the NYPD uniforms to distinguish municipal officers from ICE and/or affirmative litigation.

Ending Transfers to ICE. While the City prohibits its officers from using time to provide information to ICE or transferring people to ICE custody in many instances, it still permits some notifications and transfers to ICE based on a person's criminal history and other factors. This exception is unjust. It also creates the unnecessary risk that municipal officers will erroneously provide information about a person or facilitate their transfer to ICE, and it must be eliminated.



#2

Mandate Rigorous Public Reporting and Institute Independent Oversight of Interactions with ICE to Promote Transparency and Public Accountability

At present, the NYPD and other City law enforcement provide almost no publicly available information regarding their communications with and assistance provided to ICE. This is due in part to the fact that existing law imposes very few reporting requirements upon city agencies, and even fewer that require reporting to the public. As a result, the City denies the public critical information about the extent to which city resources are being used to advance immigration enforcement and renders the public unable to hold cooperating agencies accountable. Moreover, the City itself has no independent agency that plays an oversight role in this respect. This unacceptably places the power over the interpretation and implementation of New York City's law in the hands of the NYPD and related agencies. The City should eliminate these problems by:

Instituting a rigorous regime requiring detailed reporting on communications and interactions with ICE. All city agencies should be required to report the details of any communications with ICE—including requests for assistance and administrative subpoenas and responses to those requests—on a monthly basis. This information, anonymized, should be posted on a publicly available website.

Adopting a policy or law limiting city agencies' use of certain exemptions under NY's Freedom of Information Law to refuse disclosure of records related to communications with or interactions with ICE. New York City should dramatically limit the extent to which its agencies invoke FOIL's law enforcement exemptions and its interagency communication exemption for these types of records by prohibiting agencies from invoking certain provisions of the FOIL unless the disclosure of such records would clearly and substantially harm an ongoing criminal investigation or proceeding.²⁴



#3

Create First-of-their-Kind Enforcement Mechanisms for Violations of New York City's Disentanglement Laws

New York City's disentanglement laws serve an important function, but the way that they are implemented—and therefore their efficacy—is often at the discretion of the NYPD and other agencies. This is because these laws lack any mechanism that would allow the public to hold city agencies and officers accountable when they violate these laws. This disempowers our community members; makes immigrants rightly fearful that, when the NYPD and others overstep, they cannot turn to our courts; and allows for the NYPD and other agencies to be the arbiters of implementation, undermining a core purpose of these laws. New York City should again be a leader in immigrant-protective policies; it should become the first city in the nation to take the bold and important step of creating clear mechanisms to allow community members to play a role in the implementation of these laws and to vindicate their rights under these laws in court. The City should empower community members, ensure access to justice, and hold bad actors accountable in four ways:

Amend New York City's disentanglement laws to create a private right of action that includes monetary relief and statutory penalties.

The City should draw upon the approach taken in the recent package of local laws addressing police misconduct and create a private right of action for violations of New York City's disentanglement laws.²⁵ This private right of action should allow individuals to bring suit where city officers violate these laws, and it should include a statutory damages penalty provision and attorneys' fees.

Adopt an indemnification policy that imposes costs on those who violate disentanglement laws.

Because New York City virtually always indemnifies its officers in damages actions, NYPD officers are rarely held financially responsible when they violate important laws designed to constrain the discretion of law enforcement.²⁶ City agencies that violate these laws are also shielded from financial responsibility, as damages do not even come out of the city agency's coffers.²⁷ This undermines the value of litigation as an accountability mechanism. The City should adopt a policy of declining to indemnify officers who violate the city's disentanglement laws or rules implementing those laws due to bad faith or malice.²⁸ If any officer who is not indemnified does not have the financial means to make the payment, New York City should commit to paying any portion of the award that the officer cannot pay to ensure that the injured party receives full



compensation. The City should also require that any damages awarded for violations of the disentanglement laws come from the operating budget of the city agency responsible for the violation, and that the agency is not given additional funding to compensate for having to pay damages awards.²⁹

Impose rigorous pre-disclosure notification requirements and intervention rights in the event of compelled information-sharing.

Creating pre-disclosure requirements would empower people to object and intervene—*before* their identifying information is disclosed—if and when New York City believes that a particular disclosure is required by law.

Establish an independent body charged with oversight of city agencies’

implementation of municipal disentanglement laws and interactions with ICE. The City’s law enforcement agencies cannot be depended upon to police themselves when it comes to compliance with New York City’s disentanglement laws, including their reporting requirements. A new independent oversight body should be created to ensure genuine accountability, responsiveness in time-sensitive situations, and transparency with the public in interactions between city agencies and ICE.



#4

Limit Interactions Between Local Law Enforcement and Immigrant Communities

Interactions between local law enforcement and immigrant communities increase the risk that New Yorkers will be separated from their families.³⁰ Divesting police from immigrant communities not only has the benefit of decreasing the interaction between these communities and the police, but has also demonstrated a general decrease in gun violence.³¹ To protect immigrant communities from the federal and local criminal legal systems, New York City should immediately end fare evasion enforcement,³² remove police from homeless outreach and diversion, and remove police from public schools.³³



Access to Counsel for All New Yorkers Facing Deportation



While the 2020 pandemic wreaked havoc on the lives of immigrant New Yorkers, the past four years have shown the worst excesses of a longer-standing threat: the federal deportation regime. This regime, built on aggressive enforcement and punitive policies, has thrust many immigrants in the United States—including in New York—into deportation proceedings and forced them to face off against a trained ICE prosecutor, in English, in one of the most technical areas of law, all without the assistance of legal counsel.³⁵

New York City has long led the nation in this arena. For example, it launched the nation's first public defender-type system of deportation defense, which has proven to be enormously impactful. Immigrants represented by these attorneys have a 48% success rate in their cases, compared to a 4% success rate by immigrants without an attorney.³⁶ This is a 1,100% increase from the “observed” success rate for unrepresented cases before this program existed.³⁷ As these statistics show, the assistance of competent counsel is a lifeline to ensure that people are not prevented from making their cases and vindicating their rights to remain in their communities and with their families simply because they cannot afford an attorney. And, given the economic fallout from the recession in immigrant communities in particular, the cost of private attorneys will be out of reach for many.

New York City must prioritize ensuring counsel for community members who face deportation, need critical immigration legal services, and who may otherwise face the risk of permanent separation from their families, being ripped away from their homes, and “the loss of all that makes life worth living.”³⁸ The next administration should continue the City's pathbreaking efforts to ensure access to justice for *all* immigrant New Yorkers and, in so doing, build durable protections for our immigrant communities and set an example for the nation.



#1

Foster and Support Access-to-Counsel Initiatives for Noncitizens Facing Removal

The stakes for those in immigration court are extraordinarily high, especially since the consequences of deportation may be “a fate worse than death,”³⁹ or even death itself. This is crucial because a noncitizen's fair chance in immigration court—and their ability to remain in their community and with their families—should never have to depend on their ability to pay for an attorney. The City must prioritize access-to-counsel efforts to ensure



that immigrant New Yorkers who face deportation are not forced to choose between hiring a lawyer and feeding their children, especially when today's recession has taken people's jobs and drained them of any savings. Doing so will also provide an important protection to low-income immigrants who are otherwise vulnerable to immigration legal services-related scams that allow fraud and deceptive practices to flourish in the City.



#2

Maintain Funding for the Immigrant Opportunities Initiative, Rapid Response, ActionNYC, and Other Crucial Programs

The City must also commit resources to other areas of immigration legal services that prevent immigrant New Yorkers from being unjustly deported. The next mayoral administration must maintain funding for vital, gap-filling legal services that provide longtime New Yorkers a real chance at remaining in their homes, jobs, and communities. These programs include, inter alia:

The Rapid Response Legal Collaborative (RRLC) is a first-of-its-kind program that provides legal assistance to immigrants with final orders of removal who are in danger of being ripped away from their families and homes without due process.⁴⁰ As the past four years have made plain, the federal immigration enforcement regime threatens many longtime members of our communities with immediate deportations based on deportation orders issued long ago. And the first few days of the new Biden-Harris administration have shown that changing this enforcement regime will be difficult. RRLC's past and recent successes have shown how critical these services are for those at risk of imminent deportation, and the City must maintain this program.

The Immigrant Opportunities Initiative provides legal services to help low-income immigrants gain immigration status and move along the path towards citizenship. The City must continue funding this initiative that leads to increased financial and familial stability and prevents our community members from being drawn into the deportation regime entirely.

ActionNYC provides free, safe immigration legal help in a network of trusted CBOs, hospitals, schools, and libraries in over 40 languages and indigenous dialects.⁴¹ In a moment of ever-changing immigration policies and practices, the City must sustain funding levels for ActionNYC so that hard-to-reach immigrant residents continue to receive accurate information and quality immigration legal services directly within their communities.



Community-Driven Health Services for All



The coronavirus pandemic has also taken a heavy toll on immigrant New Yorkers' health. Immigrant community members have long faced a host of barriers to accessing adequate health care: many find it difficult or impossible to navigate the complex and expensive health care system due to language and other obstacles; many are shut out of a significant portion of government-funded healthcare; and all too often, immigrants are forced to contend with discrimination in healthcare services. To make matters worse, misinformation and fear of incurring negative immigration consequences as a result of accessing government-subsidized benefits create additional hurdles for immigrants and mixed-status households with health needs.⁴² Indeed, some advocates reported hundreds of immigrant clients closing their Medicaid cases or refusing to seek treatment in the past year and a half, a troubling phenomenon that has persisted even through the pandemic.⁴³ NYC Health + Hospitals recently projected that 62,000 immigrant patients may abandon Medicaid and other coverage—with a corresponding loss of more than one million patient visits—due to fear and misunderstandings about how seeking health care could impact patients' immigration status.⁴⁴ As a result of these obstacles, immigrant New Yorkers' options for adequately caring for themselves and their loved ones remain limited, difficult to access, and fraught.

COVID-19 has exacerbated these inequities and revealed the devastating—even grave—consequences of a health care structure that does not adequately provide access to essential health care to this community. While frontline and service industries have long heavily relied on immigrant workers, the pandemic has put their contributions front and center, as they have sustained the City while bearing an enormous personal risk as a result of heightened exposure to the virus.⁴⁵ Now, these community members are left with difficult choices between risking their personal and familial health, on the one hand, and finding a way to feed loved ones on the other, and, even with so many unemployed, many immigrants remain excluded from basic food assistance programs.⁴⁶ While New York City has taken some key steps toward increasing health care access and meeting the nutrition needs of immigrant communities, it must do more.



#1

Provide Sustainable Funding for CBOs to Conduct Outreach and Education to Immigrant Communities

Continue full funding for the NYC Care program of at least \$100 million per year, which includes funding for CBOs to conduct outreach and education. NYC Care—a health



care program operated by NYC Health + Hospitals that offers low-cost or free health care services for New Yorkers, regardless of immigration status, who would not otherwise qualify for federal health insurance⁴⁷—is a lifeline for many immigrant New Yorkers. The City should maintain at least \$100 million per year dedicated to this program. As NYC Care expanded, a portion of the NYC Care funding provided initial short-term funding for CBOs to educate communities in linguistically appropriate and culturally competent ways about the NYC Care program. However, the City has not guaranteed sustaining this funding.⁴⁸ Meanwhile health concerns continue to flare as COVID-19 has disproportionately ravaged immigrant communities⁴⁹ and confusion about the immigration consequences of accessing care is still rampant, so the need for outreach and education remains as urgent as ever. The City must provide stable, long-term funding for this outreach, and it should ensure that CBOs continue to be resourced to enroll people directly in NYC Care rather than sending them into a confusing, multi-step enrollment process that may dissuade people who lack the ability to navigate the process on their own.

Maintain at least \$2.5 million and expand funding for Access Health NYC. Access Health NYC is an initiative that funds CBOs to provide education, outreach, and assistance to all New Yorkers about how to access health care and coverage.⁵⁰ Access Health NYC plays a vital role in New York City’s health network and the City’s public health more generally; it focuses on individuals who are uninsured, disabled, difficult to reach, lack proficiency in English, and otherwise face barriers to health care, and it provides them with culturally competent information about and assistance accessing free and low-cost health services, including primary and preventative care.⁵¹ The City must maintain and expand funding for Access Health NYC to ensure that all New Yorkers receive culturally competent, accurate information about how to navigate the complexities of New York’s health care system and achieve better health outcomes.



#2

Ensure Sustainable Municipal Funding for Community Health Workers

Community Health Workers (CHWs)—frontline health workers who are trusted members of the communities they serve—have long played a vital role in NYC’s health care ecosystem by connecting community members with culturally competent health services. For immigrant patients, CHWs are especially important. They are trained to navigate linguistic



and cultural barriers; translate differences in health systems; and ask probing questions to understand the root of problems and identify appropriate, workable solutions.⁵² The City currently relies heavily on CHWs, but the state and federal funding for many of them has dried up, leaving communities in jeopardy of losing these essential health workers at a time when they need them most.⁵³ The City must take up the mantle and expand upon existing models that place CHWs at CBOs while embedding them into hospitals and clinics. This will allow them to serve as a bridge between the health system and the community, ensuring that community members can access the health services they need. CHWs will ensure that immigrant communities are able to access COVID testing, treatment, and the vaccine. Individuals who are Limited English Proficient or who struggle with technology or lack access to stable internet struggle getting appointments for the vaccine. Considering that immigrant communities are already experiencing difficulty accessing the vaccine during the citywide rollout, it is especially important that CHWs are armed with the resources necessary to ensure successful and widespread vaccination.⁵⁴ CHWs can play a key role in providing one-on-one assistance helping to mitigate the fears and concerns related to the vaccine, and helping individuals make appointments and receive the vaccine. Beyond COVID, CHWs can continue to play a vital role ensuring that immigrant communities are able to access crucial health and social services.



#3

Commit \$1.25 Million to Emergency Food Assistance Programs

Inadequate access to nutritious food has created and exacerbated health problems in New York City's immigrant community, and the pandemic-related economic fallout has dramatically increased food insecurity among immigrants, including mixed-status families.⁵⁵ Hunger and a dearth of nutritious food options have hit the immigrant community especially hard,⁵⁶ because undocumented immigrants are denied access to "food stamps" and even immigrants and mixed-status families eligible for food assistance have avoided or disenrolled from these programs in fear that participating will trigger negative immigration consequences.⁵⁷ As a result, the immigrant community now depends on emergency food assistance programs such as food pantries and soup kitchens like never before.⁵⁸ The City must do more to meet the dramatically increased need. It must commit \$1.25 million to food assistance, prioritizing difficult-to-obtain food products and the needs of immigrant and mixed-status households.



#4

Create and Fund Non-Police Response to Mental Health Emergencies

The COVID-19 fallout has further strained a mental health care system that already provided inconsistent and inadequate care to immigrant New Yorkers.⁵⁹ The anxiety and stress it has created for many are well documented,⁶⁰ but the additional toll it has taken on immigrants and their families make these stresses especially acute in these communities—and difficulties in obtaining mental health care leave many people to grapple with these conditions on their own.⁶¹ This is particularly problematic for Black, brown, and immigrant communities because of the way that the City has responded to mental health emergencies: by deploying the NYPD, which has proven ill-equipped and sometimes dangerous when called to respond to mental health crises.⁶² The City must do more. It should:

Create and fund a citywide non-police response for emergencies. The City must invest in developing non-police responses to non-criminal emergencies. This would include following the recommendations in the Public Advocate's report *Improving New York City's Responses to Individuals in Mental Health Crisis* to ensure that essential 24/7 mental health services are funded,⁶³ as well as using mobile crisis intervention teams modeled after successful programs such as the CAHOOTS (CRISIS Assistance Helping Out On The Streets) program which relies on community relationships and the ability for first responders to provide care and support, as opposed to having the NYPD serve as the first responders.⁶⁴ And, given that almost 25% of City residents have limited English proficiency,⁶⁵ it is critical that the medical response team personnel are able to communicate in Spanish and other non-English languages.⁶⁶

Increase community education on any mental health-focused response program.

The benefits of any mental health response program will not be realized if immigrant community members remain reluctant to call 911 due to fear that the NYPD will respond. As a result, the City must fund community education so that immigrants and other community members can seek help for mental health emergencies without the fear of putting their loved ones or themselves at risk.



**Safe, Affordable
Housing for All**



New York City has long faced an affordable housing crisis, with skyrocketing rents, the ever-present threat of eviction for many low-income New Yorkers, and rampant displacement of low-income community members. However, housing inequality has never been clearer than in this moment, as many wealthy New Yorkers escaped the City to second homes during the pandemic whereas low-income New Yorkers—including the many who have sustained our City through the pandemic—are now at risk of eviction and homelessness at even greater rates.⁶⁷ Despite a temporary reprieve from the state in the form of a short-term moratorium on evictions until May 1, 2021,⁶⁸ the threat of homelessness still looms as cash-strapped tenants consider how they will eventually pay months' worth of back rent.⁶⁹ Meanwhile, many of these renters encounter threats and harassment by abusive landlords attempting to push them out.⁷⁰

Immigrant New Yorkers have been particularly hard hit by the housing crisis. Because many are prevented from receiving federal COVID-19 relief, state unemployment benefits, and rent assistance programs, a disproportionate share of immigrant New Yorkers are vulnerable to losing their housing due to the economic impacts of COVID-19.⁷¹ Indeed, a recent survey of immigrant New Yorkers conducted by MRNY—which followed up on the aforementioned survey—shows that out of more than two hundred respondents, 85% were concerned about paying the next month's rent.⁷²

The City must take the following bold steps to ensure a safe home for every New Yorker, prioritize racial equity, and prevent the immigrant community members that sustain it from being pushed into poverty and homelessness. For further detail on these and other affordable housing and homelessness recommendations, see *Right to a Roof*, a joint report published by various organizations, including Make the Road New York.⁷³



#1

Create an Integrated Housing Plan that Prioritizes Long-Term, Needs-Based Solutions Over Numbers

New York City has historically had a siloed approach to housing planning, with separate and unequal approaches to private housing, public housing, and homelessness. The next mayoral administration should create an integrated housing plan that brings together all of the agencies involved in housing, building, and planning.⁷⁴ This plan should focus on the shared goals of ending homelessness, promoting racial equity, and ending discrimination



based on immigration status. The plan should also include shared metrics to ensure that all agencies are working together efficiently to take into account the needs of all New Yorkers. The integrated housing plan should prioritize providing permanent, affordable housing for those who need it most, especially immigrant New Yorkers. This integrated plan and its implementation should be overseen by a new Deputy Mayor for Homelessness, Housing, and Planning. The next mayor can prioritize this in the following ways:

Provide more available and affordable housing citywide. Even with new affordable housing construction such as Mandatory Inclusionary Housing,⁷⁵ most new development remains “as-of-right” with no affordability requirements; this allows developers to build housing as they please without any real incentive to build affordable housing in an economically feasible way.⁷⁶ As a result, New Yorkers making less than 50% of the area median income continue to struggle to find affordable homes, a disparity that will be exacerbated due to COVID-related economic distress. The City must do more, especially in high-opportunity neighborhoods.⁷⁷

Invest in operating subsidies over tax breaks. Tax incentives—the primary tool for meeting the housing needs of low-income New Yorkers—are insufficient for providing affordable housing.⁷⁸ The City should fund operating subsidies as a form of rent assistance that would allow tenants to pay lower rents without compromising building operations and quality of life.

Prioritize affordable housing for project approvals. Utilize interagency coordination to prioritize affordable housing in all necessary administrative approvals during development, particularly Department of Buildings approvals for construction.

Create more supportive housing⁷⁹ and tie unit size mix to need, especially for single adults, by prioritizing supportive housing in new construction. The City should acquire and convert existing resources, such as shelter hotels (hotels that contract with the City to house homeless people) and vacant properties, into supportive housing.⁸⁰ The City should use a data-driven approach to ensure housing lottery units meet the need for people to be housed appropriately.



#2

End Housing Segregation and Improve Access to Affordable Housing



Currently, the need for affordable housing has dramatically outpaced affordability, and those on the brink of homelessness struggle to find stable, permanent housing, sometimes due to discrimination.⁸¹ The City should prioritize an interagency approach to promoting fair, nondiscriminatory housing and streamline the process for finding and securing affordable housing options. This can be done in the following ways:

Fund the Human Rights Commission (HRC) to enforce against discrimination violations and provide fair housing counseling. This should ensure coordination between HRC and Housing Preservation & Development (HPD) to punish landlords who discriminate, including on the basis of one's source of income.⁸²

Increase CityFHEPS voucher subsidy to fair market rent⁸³ to provide more options for holders.

Create a rapid rehousing system to reduce homelessness and allow local emergency placements. The City should expand upon the model that reduced veteran street homelessness by 90% through interagency coordination.⁸⁵ It should also allow local, mission-driven property owners to rehouse quickly and locally in emergency situations, such as displacement due to fire.

Streamline and better fund assistance with accessing and applying for affordable housing. The City should streamline voucher applications and Housing Connect, and it should ensure that those who qualify, including people in shelters, can access assistance. The City should also fund more Housing Ambassadors to help New Yorkers, including in shelters, find and apply for affordable housing.



#3

End Real Estate Speculation by Supporting Local Owners

Speculation and displacement continue to threaten New York City's low-income communities, and Mayor de Blasio has favored for-profit developers over mission-driven non-profits to develop public land.⁸⁶ The City's integrated housing plan should stabilize neighborhoods by creating and preserving 100% permanent affordable housing that is community-focused and working to keep existing residents in their homes. The City can take action in the following ways:



Utilize public land for public good and develop more public sites as affordable

housing. Require publicly-owned sites to be developed as 100% affordable housing, by mission-driven developers, with deep affordability and space for community facilities. Identify underutilized and underbuilt public sites for transfer to HPD, especially in high-opportunity neighborhoods.

The City should **build capacity of non-profit developers**, including paying interest on pre-development loans for non-profit developers and giving preference in requests for proposals to those who have developed large portfolios of low-income housing in order to encourage developers to take on these projects.

Assist struggling homeowners and small landlords. The City should fund foreclosure prevention services, including legal services and counseling, community land trust models,⁸⁷ and expansion of the Homeowner Help Desk,⁸⁸ and also fund programs that help homeowners make repairs, such as HomeFix,⁸⁹ to keep existing homeowners and their tenants in their homes.



#4

Ensure Housing Quality for All New Yorkers

Immigrant New Yorkers are particularly vulnerable to poor housing conditions and other harassment by landlords.⁹⁰ This is especially true given many immigrant New Yorkers' current economic fragility, and it is critical to ensure that no one is displaced due to poor housing conditions or harassment. The City should ensure housing quality for all New Yorkers by taking the following steps:

Hold bad landlords accountable for behavior such as harassment and failure to make adequate repairs. Specifically, the City should create stronger rules to prevent abusive landlords from doing business with the City. Landlords with demonstrated records of tenant harassment and/or deferred maintenance should not be eligible to receive City funding and should not have properties returned to them after going through City programs such as 7A.⁹¹

Strengthen enforcement mechanisms against landlords. The City should recover civil penalties when landlords fail to make repairs, and it should bring harassment claims



against landlords on the tenants' behalf, rather than relying on tenants and third parties to conduct that type of enforcement. To make this initiative effective, the City should also educate judges, court personnel, and City agencies on harassment, including existing law and remedies.

Expand the Alternative Enforcement Program,⁹² a highly effective tool for addressing distressed properties that identifies buildings with high numbers of violations for priority repairs.

Expand the Housing Right to Counsel Program.⁹³ The current Housing Right to Counsel program should be expanded to cover anyone making less than 400% of the federal poverty level to ensure that all low-income tenants in New York City will have representation in housing court.

Expand Funding for and Legalize Accessory Dwelling Units (ADUs). The City should update the regulatory framework for ADUs, including basement and cellar apartments, to provide homeowners with access to grants, subsidies, and abatements, to legalize approximately 200,000 affordable apartments and to ensure the safety of the populations already living in them.



#5

Center Local Knowledge in Planning Decisions

The de Blasio administration initiated rezonings in six low-income communities of color while ignoring community-driven proposals to guide development in neighborhoods elsewhere. The next mayor should prioritize community-centered planning by doing two things:

Create a Citywide Comprehensive Planning Framework that includes city- and community-district-level targets for growth; affordable, supportive, and homeless housing; public facilities; and infrastructure. Create a collaborative process that allows local residents and stakeholders to direct implementation. Ensure that resource allocation is tied to need rather than rezoning.

Mandate a Racial Impact Study for rezonings and proposed development projects, and **require analysis of community-based plans.** Community-initiated plans should be considered as alternatives to City and developer-driven proposals as part of the Uniform Land Use Review Procedure.



**Stability and Protection for
All Workers**



While COVID-19 created unprecedented job losses throughout the nation, the devastating effects were most pronounced for immigrant workers.⁹⁴ This is particularly true in New York City, as immigrant New Yorkers have long sustained the industries hardest hit by the pandemic.⁹⁵ Making matters worse, although immigrants comprised the largest proportion of the City's front-line workers during the COVID crisis,⁹⁶ many immigrants have been denied access to relief programs at all levels of government. For example, undocumented New Yorkers have not only been cut out of federal relief programs, but are also ineligible for critical forms of worker protections, including unemployment insurance and virtually all forms of safety-net assistance.⁹⁷ The consequences of denying these supports during this unprecedented recession have proven economically disastrous for many in New York City's immigrant community. While the City appeared to recognize this when it launched the Immigrant Emergency Relief Program,⁹⁸ that program did not come close to meeting the community's needs: the private funding for the one-time payment program quickly ran out—covering an estimated three percent of the City's undocumented residents—and the single payments did not provide the ongoing, longer-term relief that many families and individuals need, yet distribution still overwhelmed many service providers.⁹⁹

Given the job losses and inability to access relief that have destabilized many of the City's immigrant communities, immigrant workers are now even more vulnerable to abuse by employers. Pre-pandemic, the Center for Popular Democracy estimated that wage theft in New York State may impact 2.1 million workers and account for \$3.2 billion annually in wages and benefits unlawfully withheld;¹⁰⁰ there has been a significant uptick in reports of wage theft in the City amidst the pandemic.¹⁰¹ Undocumented workers are particularly vulnerable to this type of workplace abuse, as they are often targeted by employers who threaten to retaliate by firing or reporting them to immigration authorities if they seek to vindicate their right to full and fair compensation for their work.¹⁰² And, although New York State has adopted a number of laws to protect workplace rights such as \$15 minimum wage, equal pay, and protections against wage theft, it neither adequately enforces these rights nor provides workers with the necessary resources to do so.¹⁰³ The City must take action to support immigrant workers and ensure meaningful protections from wage theft and abuse.



#1

Launch an Unemployment Insurance Equivalent Program and Ensure Access to City-Run Relief Programs for Excluded Immigrants

The City should launch a first-of-its-kind unemployment insurance equivalent program that would pay a flat monthly rate—equivalent to existing unemployment benefits for qualifying individuals—to individuals excluded from state and federal unemployment benefits. This program should provide this type of support to community members who are excluded from other unemployment benefits on the basis of their immigration status and recently incarcerated individuals (in immigration detention, jail, or prison) who lack the work history necessary to qualify for unemployment benefits. In this way, the supplemental city program would provide necessary stability and support for people—many of whom are in essential industries—who have been shut out of basic relief programs. Additionally, to fill the gaps caused more broadly not only by loss of work, but also by reduced hours, lack of access to essential medical care, and the host of other pandemic-related challenges that have thrust immigrant New Yorkers into financial distress, the City must create publicly funded disaster relief programs that provide reliable, adequate, and ongoing financial assistance. Finally, if the City must rely on nonprofits to distribute assistance, as it did with the previous round of relief, it should also scale up and resource its non-profit partners to fully meet the need.



#2

Increase Funding for Legal Services for Workers Subjected to Wage Theft and Abuse in the Workplace

One of the reasons employers perpetrate workplace abuses, such as discrimination and wage theft, against immigrant workers is that, all too often, they can get away with it. Low-wage immigrant workers are typically unable to rely on state agencies for redress and unable to afford private attorneys, and therefore rely upon government-funded civil legal services to help them vindicate their rights. Given the increased vulnerability of immigrant workers now, the City must increase funding for pro bono legal services to ensure that all immigrant workers who have been cheated out of wages, discriminated against in the workplace, or subjected to health and safety violations at work have access to representation to seek redress.¹⁰⁴ In particular, the City should stabilize funding for important legal services programs, including by committing to increase funding for the



Immigrant Opportunities Initiative¹⁰⁵ and committing to baselining \$7.5 million in annual funding to the Low-Wage Worker Initiative.



#3

Leverage Municipal Power as Market Participant to Disincentivize Forced Arbitration Clauses and Other Nefarious Employer Practices

While federal and state preemption limits some of the legislative power of the city to support low-wage workers, the City retains substantial power in this realm as a market participant. The City should use this power to reward fair, transparent, and equitable workplaces with its business. It should also require companies who seek to do business with the city to disclose anti-worker practices such as forced arbitration clauses, non-disclosure policies that silence whistleblowers, or other unfair or abusive labor practices, and the City should consider these practices as negative factors when deciding which companies to reward with its business.



#4

Implement Legal Protections Against Firing Workers Without “Just Cause”

Under the current “at-will” employment scheme, employers enjoy free rein to fire a worker for any reason or no reason at all, so long as the employer’s justification is not otherwise prohibited by an anti-discrimination statute or other law.¹⁰⁶ With few safeguards from arbitrary dismissal, and because under current law workers bear the burden of proving that their dismissal was unlawful, workers are hesitant to speak up about workplace concerns or violations.¹⁰⁷ The pandemic has highlighted the extreme risks that at-will employment poses not only to workers, but also to communities: workers without the confidence to challenge a lack of personal protective equipment, overcrowding, or rising infection rates in their workplaces may feel compelled to continue laboring in unsafe conditions, and risk transmitting the virus to their families, neighbors, and fellow commuters.¹⁰⁸ The City should pass just cause protection legislation to provide New Yorkers with a fair chance at stable employment and greater ability to contest poor conditions or illegal practices.¹⁰⁹



**Adult Literacy, Job Training,
and College Access for All**



Because of the now precarious economic status of many within New York City's immigrant communities, English language proficiency, literacy, and educational achievement—key determinants of social and economic outcomes—have become important mechanisms for confronting the increased stratification and subordination of these communities.¹¹⁰ Higher English language proficiency, literacy levels, and educational attainment are essential for equipping marginalized people with the tools they need to navigate complex systems, overcome disparities and inequities in areas such as health care and housing, become civically engaged, obtain employment, and/or advocate for themselves and their children to attain a better quality of life. Yet, more than 2.2 million adults in New York City lack a high school diploma, English language proficiency, or both.¹¹¹ English language proficiency, literacy, and educational attainment have become all the more urgent now, in the midst of an economic downturn fueled by the global pandemic in which lower-income people and people of color have been disproportionately affected by job losses, and left behind in the shift to remote work and school. Remote work for many people in these groups simply is not an option,¹¹² and studies show that school shutdowns caused by COVID-19 may be worsening already troubling student-achievement gaps.¹¹³

Adult literacy classes and college access programs are especially important for immigrant New Yorkers and children in mixed-status households. Half of immigrants and 63% of undocumented immigrants in New York City are Limited English Proficient and thus speak English less than “very well.”¹¹⁴ This dramatically limits their economic and other opportunities, and is entirely changeable through access to basic education. However, due to woefully inadequate funding for adult literacy education, a tiny fraction—less than 3%—of adult New Yorkers in need can get into adult basic education, high school equivalency, or English as a Second Language classes.¹¹⁵ Similarly many students who are immigrants or children of immigrants and seek higher education face unique barriers in the college admissions process due to, among other things, a lack of family knowledge about navigating college applications and financial aid.¹¹⁶ The City must increase and make permanent funding for these essential programs. To continue with the status quo will only serve to produce entrenched inequity, as immigrants and their children will be shut out of entire job categories and denied any meaningful opportunity to achieve upward mobility.¹¹⁷



#1

Increase Funding for Adult Literacy Programs

To address the unmet need for access to adult literacy classes, the City, alongside the state, must commit to increasing investment in these programs by approximately six times the current funding levels over the next five years to scale to \$500 million in total funding (including \$90 million from the City for community-based literacy programs).¹¹⁸ This increase in funding will expand access by adequately resourcing the key components necessary to sustain stable, high-quality adult literacy programs: staff and personnel costs; student supports; materials and tools; program space; technology; and organizational management systems and support.¹¹⁹ Not only would this additional investment in adult literacy benefit immigrant communities by creating pathways to social and economic mobility, but studies also predict a substantial benefit to the broader community at a time when the City needs it: New York City would likely see a 10% increase in gross domestic product if all adults were brought to at least the minimum level for proficiency in literacy.¹²⁰



#2

Utilize Adult Literacy Programs as Empowerment Hubs for Know-Your-Rights Campaigns and Information

Informational campaigns can play an enormous role in informing and protecting immigrant New Yorkers by equipping them with the tools they need to: receive important public health advice; protect themselves against community harm, including ICE raids and consumer fraud; and to be civically engaged, for example in census outreach. Adult literacy classes offer a better, more accessible way to share this information than do informational campaigns conducted through, for example, employers or health providers alone. Because of this, these classes should be used as community hubs where individuals are not only taught English proficiency and literacy, but are also exposed to information about their rights in general and in the workplace. By incorporating know-your-rights information into the curricula of all City-funded adult literacy classes, the City can maximize the use of these class spaces by providing important community information, allowing it to reach, impact, and empower thousands of immigrants and their families.



#3

Remove Work Authorization Requirement from Job Training Programs

Workforce development programs serve as another key component of city-funded education for adults. Currently, the City offers training programs in the food service, healthcare, industrial & construction, tech, and media and entertainment industries, along with accompanying job training grants.¹²¹ However, individuals interested in these training programs often must have work authorization to be eligible to enroll. This qualification means that immigrants without proof of authorization to work legally are denied access to these important programs—even if they aspire to regularize their status and even if they are merely waiting for their applications for employment authorization to be approved. As a result, many immigrants are prevented from gaining skills that are often critical for providing for themselves and their families. The City should remove this barrier to participation and make these training programs accessible to all New Yorkers, regardless of immigration and work authorization status.



#4

Increase Funding for and Expand Access to College Access Programs and Summer Youth Employment Program (SYEP) to Include Undocumented Youth

The shift to remote schooling during the pandemic has led to substantial drops in immigrant enrollment in schools¹²² and less interaction with and guidance from college counselors, adding to the hurdles holding back immigrant youth from pursuing higher education.¹²³ In addition, implementation of the New York State DREAM Act, which provides undocumented and other students access to New York State-administered grants and scholarships that support their higher education costs, has created challenges,¹²⁴ and complexities in the application process have likely discouraged some otherwise eligible young people from applying.¹²⁵ To address these gaps and ensure that working class immigrant youth are equipped with the resources to get into college, the City must commit to increasing funding levels for Student Success Centers and other college access programs for immigrants, which are proven to successfully improve outcomes for working class immigrant youth. Additionally, the City should expand eligibility for SYEP—an important summer program that employs and provide career-focused opportunities to young people—to undocumented youth and others, who are currently excluded due to its current work authorization requirement.¹²⁶



CONCLUSION

Now is the time for the City to step up and take strong action to support its immigrant residents. New leaders of the City must ensure that immigrant New Yorkers have equal access to the basic rights necessary for them to survive, grow, and prosper, and they should take bold, progressive steps to make the City a leader in the larger effort for immigrants' rights, equity, and justice. *Dignity, Community, & Power: 2021 Vision for NYC's Immigrant Communities* offers these leaders a blueprint for achieving these vital goals.



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10. Press Release, New York State, Governor Cuomo Signs into Law Sweeping Election Reforms (Aug. 20, 2020), <https://cutt.ly/UjoWQLx> [https://perma.cc/TPP3-Q6UJ].
11. *Id.*
12. Ethan Geringer-Sameth, *New York City Sees First-Ever Balance Among Early, Absentee & Election Day Voting*, GOTHAM GAZETTE (Dec. 16, 2020), <https://cutt.ly/LjoWEIM> [https://perma.cc/T2CC-ZG6L] (noting that over three million people in New York City voted in the 2020 general election, up by about 300,000 votes from 2016); Ethan Geringer-Sameth & Ben Max, *Breaking Down Final 2020 Vote Tallies Across New York City*, GOTHAM GAZETTE (Dec. 4, 2020), <https://cutt.ly/ljoWYw8> [https://perma.cc/UW6G-7Q34] (describing New York City's roughly 3.07 million ballots cast as "the greatest increase of any



- election cycle in the last 20 years and edging out the huge turnout leap between 2012 and 2016”).
13. N.Y. Elec. Law § 8-400 (McKinney 2020) (subsection (1)(b) is in effect until Jan. 1, 2022, and subsection (2)(d) was in effect until Dec. 31, 2020).
 14. As used throughout this section, “ICE” refers to ICE and other Department of Homeland Security (DHS) subcomponents.
 15. See, e.g., Immigrant Defense Project, “Story 1509,” ICE Watch Database (Feb. 27, 2020), <https://cutt.ly/nkMjzy8> [https://perma.cc/L37L-65X9] (incident involving NYPD-assisted ICE arrest during a Bronx home raid); Immigrant Defense Project, “Story 1043,” ICE Watch Database (Sept. 10, 2018), <https://cutt.ly/5kMh8ks> [https://perma.cc/6JBN-G54E] (incident involving use of NYPD patrol car to facilitate Bronx ICE home raid); Lydia Hu, *Man Shot in Face During Brooklyn ICE Arrest*, Spectrum News NY1 (Feb. 6, 2020), <https://cutt.ly/KjpxJh9> [https://perma.cc/C4SJ-JCDC]; Emma Whitford, *Immigrant Advocates Criticize NYPD For Facilitating ICE Arrest on Queens Street*, Gothamist (May 31, 2017 2:34 PM), <https://cutt.ly/5jpxKce> [https://perma.cc/4N5L-CR2T].
 16. Amba Guerguerian, *Jaywalking Charge Leaves Bronx Resident on the Brink of Deportation*, INDYPENDENT (Feb. 2, 2021), <https://cutt.ly/OkVU5Hi> [https://perma.cc/223B-E5N9]; Andrew Ramos, *Family Torn Apart: Bronx Man’s Deportation Delayed, but Not for Long*, PIX 11 (Jan. 29, 2021), <https://cutt.ly/zkVIEGK> [https://perma.cc/UKV2-NQQC].
 17. These other agencies include the Department of Correction and Department of Probation.
 18. NEW YORK CITY, N.Y., CODE § 10-178(e) (emphasis added) (“Nothing in this section shall prohibit city officers and employees from performing their duties in accordance with state and local law by, including, but not limited to: (i) participating in cooperative arrangements with city, state, or federal law enforcement agencies that are not primarily intended to further immigration enforcement or utilizing city resources in connection with such cooperative arrangement and (ii) taking actions consistent with sections 9-205, 9-131, and 14-154.”).
 19. See, e.g., NEW YORK CITY, N.Y., CODE § 10-178(b), (c) (prohibiting use of city resources for immigration enforcement and prohibiting agencies from subjecting city employees “to the direction and supervision of the secretary of homeland security primarily in furtherance of immigration enforcement”).
 20. See, e.g., Office of the Mayor, NYC, Press Release: De Blasio Administration Announces Citywide Guidance and NYPD Protocol to Codify Restrictions on Assistance with Federal Immigration Enforcement (Jan. 31, 2018), <https://cutt.ly/4kVM6Jl> [https://perma.cc/KT7T-CKDJ].
 21. See SANTA CRUZ, CAL., ORDINANCE NO. 2017-06 (2017), <https://cutt.ly/wjpxCcb> [https://perma.cc/5JKA-D8A7] (prohibiting the use of City resources to assist with or participate “in any immigration enforcement operation or joint operation,” except “unless such assistance is required by any valid and enforceable federal or state law.”).
 22. See e.g., Liz Robbins, *Activists and ICE Face Off Over Detained Immigrant Leader*, N.Y. TIMES (Jan. 12, 2018), <https://www.nytimes.com/2018/01/12/nyregion/immigration-activist-deportation.html> (reporting that “the New York Police Department provided an escort for federal immigration vehicles” conducting a civil immigration arrest); see also Nick Pinto, *NYPD Says it Wasn’t an “Escort” When Police Accompanied ICE to Deport Activist Ravi Ragbir*, THE INTERCEPT (Feb. 8, 2018, 7:35 AM), <https://cutt.ly/FjpxVwy> [https://perma.cc/TUD6-CKMC] (reporting that NYPD officials and spokespeople for the mayor maintained that “officers were simply responding to the public safety concerns presented by the protest”). MRNY has also received reports from community members regarding similar NYPD support for immigration enforcement actions by ICE.
 23. Ruses are a strategy used by ICE to get access to people they seek to arrest. See ICE Ruses, IMMIGRANT DEFENSE PROJECT, <https://cutt.ly/MkV5Tax> [https://perma.cc/GW8K-HUZL] (last visited Feb. 14, 2021);



- see also Sophia Chang, *ICE Agents Allegedly Called Themselves “Local Police” During Detention Of Inwood Man*, GOTHAMIST (Oct. 10, 2020), <https://cutt.ly/7kV6sRc> [https://perma.cc/FNV5-TUEU].
24. Specifically, NYC should impose this limitation on exemptions on city agency’s invocation of subsections (e)(i), (e)(iv), and (g) of N.Y. Pub. Off. Law § 87(2) (McKinney 2020). This restriction should not affect the application of other exemptions, including those designed to protect the privacy of members of the public.
 25. See N.Y.C. ADMIN. CODE § 14-189(c); N.Y.C. ADMIN. CODE § 14-187(b)(2)-(3); see also Press Release, City of New York, Mayor de Blasio Signs NYPD Accountability Package at Black Lives Matter Mural (Jul. 15, 2020), <https://cutt.ly/6jofNHg> [https://perma.cc/YS69-C8PR].
 26. As used in this white paper, indemnification refers to the practice of a municipality paying what police officers would otherwise owe in police misconduct cases (either as a consequence of a settlement or an adverse judgment). See Joanna C. Schwartz, *Police Indemnification*, 89 N.Y.U. L. REV. 885, 913 (noting that between 2006-2011, New York City Police Department officers were required to contribute to just 0.49% of the civil rights cases in which plaintiffs received payment).
 27. See NYC MAYOR’S OFF. OPERATIONS, MAYOR’S MANAGEMENT REPORT: PRELIMINARY FISCAL 2021 INDICATOR DEFINITIONS 37 (Jan. 2021), <https://cutt.ly/TkxNYKX> [https://perma.cc/3H5F-4JLK] (describing the total citywide payout for judgments and claims as paid by the City from the judgment and claims account in the City’s General Fund); Email from FOIL Officer, to Joanna C. Schwartz, (Dec. 19, 2014, 19:18 PST) in Joanna C. Schwartz, *How Governments Pay: Lawsuits, Budgets, and Police Reform*, UCLA L. REV. 1144, 1239 (2016) (“[S]ettlements/judgments against the New York City Police Department are paid directly out of New York City’s General Fund specifically the Judgment & Claims Account.”).
 28. See N.Y. GEN. MUN. LAW § 50-k (3) (McKinney 2019) (only requiring indemnification where the officer was in compliance with the rules and regulations of their agency at the time the alleged damages arose and explicitly not requiring indemnification “where the injury or damage resulted from intentional wrongdoing or recklessness on the part of the employee”).
 29. Similar budgeting schemes have been endorsed by advocates, scholars and former City Comptrollers alike. See COMMUNITIES UNITED FOR POLICE REFORM, THE PATH FORWARD: HOW TO DEFUND THE NYPD, INVEST IN COMMUNITIES & MAKE NEW YORK SAFER 16 (2020), <https://cutt.ly/Xkva8FR> [https://perma.cc/QK4V-3AJS] (calling for the amount the city pays out in settlements during one fiscal year be removed from the subsequent year’s NYPD budget); Joanna C. Schwartz, *How Governments Pay: Lawsuits, Budgets, and Police Reform*, UCLA L. REV. 1144, 1184 (2016) (recognizing the “tangible financial consequences for law enforcement agencies that pay settlements and judgments from their budgets [and who] do not receive additional money from the government when they go over budget.”). See also CITY OF NEW YORK OFFICE OF THE COMPTROLLER, CLAIMS REPORT FISCAL YEAR 2011, at 8 (2012), <https://cutt.ly/MkxOvFx> [https://perma.cc/ALB4-KSNE] (“[T]he Comptroller’s Office again recommends that the City implement a process whereby agencies bear some financial accountability for claim activity.”).
 30. Shamira Ibrahim, *The NYPD’s Long History of Targeting Black Immigrants*, DOCUMENTED (July 1, 2020), <https://cutt.ly/TkvPlo8> [https://perma.cc/PF6X-EDCB].
 31. SHEYLA A. DELGADO, ET AL., DENORMALIZING VIOLENCE: A SERIES OF REPORTS FROM THE JOHN JAY COLLEGE EVALUATION OF CURE VIOLENCE PROGRAMS IN NEW YORK CITY 9 (2017) (finding that community outreach programs to interrupt violence led to declining gun violence in Flatbush and South Bronx, boroughs with significant immigrant communities); see generally [STATE OF OUR IMMIGRANT CITY, *supra* note 1, at 9], <https://cutt.ly/YigVKOs> [https://perma.cc/E7M7-K6YE] (identifying Brooklyn and the Bronx as having high immigrant populations).
 32. See Harold Stolper, *The MTA’s False Fare Evasion Narrative*, CMTY. SERV. SOC’Y (Jan. 29, 2020), <https://cutt.ly/Qkc36OM> [https://perma.cc/NPR7-G2N4]; Max Rivlin-Nadler, Yes, New Yorkers CAN Be



- Deported for Jumping a Turnstile*, THE VILLAGE VOICE (Feb. 27, 2017), <https://cutt.ly/vkc89kP> [https://perma.cc/6P5D-6R2U]; Samuel Rubinstein, *Fare Evasion Shouldn't Be a Crime; Neither Should Putting Your Feet Up on the Subway*, GOTHAM GAZETTE (Mar. 4, 2020), <https://cutt.ly/Skc4jfb> [https://perma.cc/2JK4-HX3R].
33. See Yoav Gonen & Eileen Grench, *Five Days Without Cops: Could Brooklyn Policing Experiment be a 'Model for the Future'?*, The City (Jan. 3, 2021, 6:00 PM), <https://cutt.ly/YkvlgBd> [https://perma.cc/F4LV-LCLB]; K. Babe Howell, *The Costs of "Broken Windows" Policing: Twenty Years and Counting*, 37 CARDOZO L. REV. 1059, 1061-63 (2016) (noting that "every police encounter that arises out of a minor offense has the potential to end in tragedy" and that "[o]ver-enforcement of minor offenses . . . has the potential to break up families.").
34. See *Drax v. Reno*, 338 F.3d 98, 99 (2d Cir. 2003) (noting the "labyrinthine character of modern immigration law—a maze of hyper-technical statutes and regulations that engender waste, delay, and confusion for the Government and petitioners alike.").
35. Because immigration law is civil and not criminal, courts have not recognized a general constitutional right to counsel in immigration proceedings. Under the Immigration and Nationality Act ("INA") parties in immigration court have the "privilege" of being represented by counsel, but "at no expense to the government." Immigration and Nationality Act § 292, 8 U.S.C. § 1362. While there is no recognized general right to counsel, a few courts have recognized rights in specific circumstances, particularly where an immigrant lacks the mental competency to represent him or herself. See, e.g., *Franco-Gonzales v. Holder*, 767 F. Supp. 2d 1034, 1056-58 (C.D. Cal. 2010) (recognizing that the provision of pro bono counsel is a reasonable accommodation required by the Rehabilitation Act for certain litigants with serious mental disabilities).
36. JENNIFER STAVE ET AL., VERA INST. OF JUST., EVALUATION OF THE NEW YORK IMMIGRANT FAMILY UNITY PROJECT: ASSESSING THE IMPACT OF LEGAL REPRESENTATION ON FAMILY AND COMMUNITY UNITY VERA INST. OF JUST. 25 (2017), <https://cutt.ly/Vja2kxk> [https://perma.cc/W2SN-FFRS].
37. *Id.* at 26.
38. *Bridges v. Wixon*, 326 U.S. 135, 147 (1945) (quoting *Ng Fung Ho v. White*, 259 U.S. 276, 284 (1922)).
39. Yolanda Vázquez, *Constructing Crimmigration: Latino Subordination in a "Post-Racial" World*, 76 OHIO ST. L.J. 599, 655 (2015) (describing deportation as "for many [] a fate worse than death as they will be separated from their family, unable to find work, unable to speak the language, or assimilate into their new country's customs.").
40. Press Release, NYC Mayor's Off. of Immigrant Affs., MOIA & ONA Announce \$1M Investment in Rapid Response Legal Services for Immigrants Facing Imminent Deportation (Sept. 26, 2019), <https://cutt.ly/fjosElh> [https://perma.cc/Q2P6-83UR].
41. Press Release, NYC Mayor's Off. of Immigrant Affs., ActionNYC: Mayor's Office of Immigrant Affairs Announces Funding Awards to Organizations Providing Free and Safe Immigration Legal Services to New Yorkers Citywide (Sept. 30, 2020), <https://cutt.ly/QklnS18> [https://perma.cc/6BAB-CK93].
42. See Michael Herzenberg, *How Fear of Deportation Compounds COVID-19 Infection Rates and Compromises Recovery for Undocumented Immigrants*, SPECTRUM NEWS (updated Aug. 25, 2020, 8:54 PM), <https://cutt.ly/vjmieKn> [https://perma.cc/23FY-B5NV] (reporting instances of undocumented community members afraid to seek treatment for COVID-19 symptoms due to fear of ICE being at hospitals); Amir Khafagy, *Some Immigrants Avoid New York Hospitals Because of the Public Charge Rule*, DOCUMENTED (May 21, 2020), <https://cutt.ly/hjgCZFJ> [https://perma.cc/V2JP-6YNP].
43. See Khafagy, *supra* note 42. MRNY notably has not seen a decline in benefit enrollments due in part to its promotoras program, where peer-to-peer health promoters conduct outreach and education on health access through MRNY's members and their community networks. See generally Press Release, Make the Road NY,



- Promotora Profile: Blanca Palomeque (Oct. 17, 2013), <https://cutt.ly/UkvT6bq> [https://perma.cc/U5B9-R7QR].
44. Press Release, *NYC Health + Hospitals, NYC Health + Hospitals, Immigration and Labor Groups Rally New Yorkers to Fight Public Charge and Continue to Seek Care Without Fear* (Dec. 5, 2020), <https://cutt.ly/bjphNk3> [https://perma.cc/267L-SSPT] (reporting that one major driver of fear and misinformation about how accessing government-subsidized healthcare impacts one's immigration status is the federal government's "public charge rule.") See *Public Charge*, U.S. CITIZENSHIP & IMMIGR. SERVS., (last updated Sept. 22, 2020) (explaining that the public charge rule bars admission or visa approval to anyone who is likely to become a public charge, which under the Trump administration has been broadly interpreted); see also Khafagy, *supra* note 42 (noting that immigrant communities are afraid to access health services because they fear it will negatively impact their immigration status).
 45. SARAH AMANDOLARE ET AL., *CTR. FOR AN URB. FUTURE, UNDER THREAT & LEFT OUT: NYC'S IMMIGRANTS AND THE CORONAVIRUS CRISIS* (June 2020), <https://cutt.ly/6jg1JJC> [https://perma.cc/SR8L-VCFY].
 46. Claudia Irizarry Aponte & Christine Chung, *Half of NYC's Immigrants are Unemployed Because of the Pandemic, Report Finds*, THE CITY (Jun. 21, 2020, 8:36 PM), <https://cutt.ly/UjgCX2F> [https://perma.cc/2KBS-2H8F].
 47. *What Is NYC Care*, NYC HEALTH + HOSPITALS, <https://cutt.ly/jjpiuaP> [https://perma.cc/7WAP-9WDB] (last visited Jan. 2, 2021); Press Release, City of New York, Mayor de Blasio Announces Plan to Guarantee Health Care for All New Yorkers (Jan. 8, 2019), <https://cutt.ly/wjnrzya> [https://perma.cc/GU7M-6GRE].
 48. See Bitta Mostofi, *New Funding Opportunity for Queens Community-Based Organizations: Help New Yorkers Seek Care and Support Without Fear*, QUEENS CHRONICLE (Jul. 16, 2020), <https://cutt.ly/ujQiaMI> [https://perma.cc/3ANB-BVW5] (Immigrant Affairs Commissioner describing the current NYC Care funding structure as a six-month period with no indication of future renewals); see also Press Release, NYC Health + Hospitals, NYC Health + Hospitals Issues Request for Proposals to Partner With Community-Based Organizations in Manhattan, Queens as NYC Care Rolls Out City-Wide in September (July 6, 2020), <https://cutt.ly/MjQIDG3> [https://perma.cc/Y6T7-E269] (press release detailing the extension of CBO partnerships in the Bronx, Brooklyn, and Staten Island at existing funding levels, but without any mention of the timeframe of funding nor the possibility of extended funding once current funding ends).
 49. Amandolare et al., *supra* note 45; see also Eyewitness News, *Coronavirus News: Immigrants Hit Hard by COVID-19 Pandemic*, AM. BROAD. CO. (Apr. 16, 2020), <https://cutt.ly/CklI6I7> [https://perma.cc/4FMU-HZLG].
 50. Access Health NYC, *COAL. FOR ASIAN AM. CHILD. & FAMS.*, <https://cutt.ly/Tjnt6vC> [https://perma.cc/4LAZ-U597] (last visited Feb. 6, 2021); *Health Care Rights & Options*, FED'N OF PROTESTANT WELFARE AGENCIES, <https://cutt.ly/OjnatbQ> [https://perma.cc/JWT6-NRRA] (last visited Feb. 6, 2021).
 51. See Press Release, Health People & Commission on the Public's Health System, *Exclusion of Community Partnerships in Bloomberg and Johns Hopkins-Controlled New York COVID-19 Contact Tracing Plan Decried* (Apr. 27, 2020), <https://cutt.ly/OjngU5m> [https://perma.cc/9J5R-YENU] (describing the value of Access Health NYC, and its ability to engage high-need communities through culturally responsive information, as "clearer than ever as the pandemic disproportionately impacts the communities served . . . across the five boroughs.").
 52. Ahmed Sougueh & Jokho Farah, *Bringing Health Care Into Communities*, STAN. SOC. INNOVATION REV. (Winter 2021) at 8, <https://cutt.ly/BjpidGm> [https://perma.cc/2J54-W2W9].
 53. Marco della Cava et al., *As COVID-19 Vaccine Rolls Out, Undocumented Immigrants Fear Deportation After Seeking Dose*, USA TODAY (Dec. 19, 2020, 5:35 AM), <https://cutt.ly/FjgQCSw> [https://perma.cc/AM5X-KWGF]; *Community Health Workers Keep Patients Connected During COVID-19 Pandemic*, COLUM.



- U. IRVING MED. CTR. (Nov. 4, 2020), <https://cutt.ly/jipigBU> [https://perma.cc/W4QS-GBJV]; Fernando Martínez, *Despite Assurances, Undocumented Immigrants With COVID-19 Avoid Hospitals*, CITY LIMITS (Apr. 10, 2020), <https://cutt.ly/Kjpih7G> [https://perma.cc/3YFB-S6D7]; Patricia J. Peretz et al., *Community Health Workers and Covid-19—Addressing Social Determinants of Health in Times of Crisis and Beyond*, NEW ENG. J. MED., Table 1, (2020), <https://cutt.ly/1jEdM7x> [https://perma.cc/MPD4-EQUQ] (discussing how CHWs have proactively contacted socially isolated patients, including immigrants, during the pandemic and connected them with critical care and support services).
54. Ethan Geringer-Sameth, *Why Didn't New York's Hardest Hit Communities Receive Covid Vaccine Priority*, GOTHAM GAZETTE (Jan.17, 2021), <https://cutt.ly/ZkvVz9c> [https://perma.cc/3EXZ-U8LH] (detailing the vaccine categorization based on whether one is a medical worker or essential worker as opposed to on medical-vulnerability, and how this categorization left out immigrant communities who have experienced high exposure rates).
 55. *More Resources are Needed to Combat Food Insecurity in New York and Across the Country*, CITIZENS' COMM. FOR CHILD. OF N.Y. (Jul. 2, 2020), <https://cutt.ly/mjpiLL> [https://perma.cc/AC4M-NBS6].
 56. See Jordan Salama, *Queens, One of the First COVID-19 Epicenters, Faces a New Crisis: Hunger*, NAT'L GEOGRAPHIC (Dec. 1, 2020), <https://cutt.ly/LkBw29I> [https://perma.cc/NF4T-ND3F]; Amanda Farinacci, *Despite Slowdown in Coronavirus Cases, Food Crisis in NYC Rages On*, SPECTRUM NEWS (Jun. 25, 2020, 6:38 PM), <https://cutt.ly/gjpijRY> [https://perma.cc/BL33-JLM8] (noting that a quarter of City households have reported at least one child going hungry as a result of COVID-19-related food insecurity); Wadzanai Mhute, *As Pandemic Reveals Gaps in Safety Nets, 'You Can't Look Away'*, N.Y. TIMES (Dec. 6, 2020), <https://cutt.ly/ljfgGWp> [https://perma.cc/K95F-DX8Y].
 57. See Zolan Kanno-Youngs, *A Trump Immigration Policy Is Leaving Families Hungry*, N.Y. TIMES (Dec. 4, 2020), <https://cutt.ly/3ipjQSq> [https://perma.cc/5XEN-FD3D]; Aponte & Chung, *supra* note 46.
 58. See Caroline Lewis, *"Thank God We Have This Support": More New Yorkers Lining Up At City's Food Banks This Year*, GOTHAMIST (Nov. 27, 2020, 10:01 AM), <https://cutt.ly/HjfhODB> [https://perma.cc/7NCC-RZYY]; FOOD BANK FOR NEW YORK CITY, *FIGHTING MORE THAN COVID-19: UNMASKING THE STATE OF HUNGER IN NYC DURING A PANDEMIC 9* (2020), <https://cutt.ly/7kBq7qi> [https://perma.cc/RD34-UGZC] (finding that food pantries have seen 59% increase in undocumented immigrants in April 2020 as compared to the months leading up to COVID-19); Kay Dervishi, *Report: NYC Food Pantries and Soup Kitchens See Increasing Demand*, NYN MEDIA (Feb. 18, 2020), <https://cutt.ly/Ljfg1QO> [https://perma.cc/XDT5-J4Y8].
 59. See Shalini Ramachandran, *A Hidden Cost of Covid: Shrinking Mental-Health Services*, WALL ST. J. (Oct. 9, 2020, 1:52 PM), <https://cutt.ly/5jfbETH> [https://perma.cc/E9JF-7UH7]. See also MAX W. HADLER ET AL., N.Y. IMMIG. COAL., *JUST AND EQUITABLE BEHAVIORAL HEALTH FOR IMMIGRANT NEW YORKERS: A POLICY AGENDA 38* (Dec. 2019), <https://cutt.ly/Gjpi9PR> [https://perma.cc/6QDJ-M2DX] (explaining that the Trump administration's anti-immigrant policies have produced "unprecedented levels of fear and anxiety" which has exacerbated the inaccessibility of and barriers to health services).
 60. Press Release, NYC Office of the Mayor, *New York City Announces New Mental Health Teams to Respond to Mental Health Crises* (Nov. 10, 2020), <https://cutt.ly/FjpkMf> [https://perma.cc/XM8P-L9E3] (noting that one in five New Yorkers struggle with a mental health condition, with many experiencing overwhelming stress and anxiety, and that treating mental illness like a crime is both outdated and dangerous).
 61. Annie Correal & Andrew Jacobs, *'A Tragedy is Unfolding': Inside New York's Virus Epicenter*, N.Y. TIMES (updated Aug. 5, 2020), <https://cutt.ly/HjfgzT> [https://perma.cc/DGZ4-53P6] (describing how the virus exposed the City's inequities, devastating working-class immigrant neighborhoods far more rapidly than others).
 62. See Greg B. Smith, *The NYPD's Mental Illness Response Breakdown*, THE CITY (Mar. 21, 2019, 10:10 AM),



- <https://cutt.ly/JipkrVv> [https://perma.cc/24G9-85R8].
63. Jumaane Williams, *Public Advocate for the City of New York, Improving New York City's Responses to Individuals in Mental Health Crisis* (2019), <https://www.pubadvocate.nyc.gov/static/assets/OPA%20EDP%20REPORT%202019.pdf>.
64. See White Bird Clinic, CAHOOTS: CRISIS Assistance Helping Out On The Streets, <https://cutt.ly/9lYcPWm>. New York City had indicated that it intends to create a pilot version of a mental health first responders program in two areas, but that pilot program will not cover the entire city and is still in its earliest phase. See Ryan W. Miller, *Pilot Program Will Replace NYPD for Mental Health 911 Calls in 2 Neighborhoods*, USA TODAY (updated Nov. 11, 2020 6:39 AM), <https://cutt.ly/NjnIYQo> [https://perma.cc/QQF7-WAFX].
65. Language Access, NYC DEP'T OF CITY PLAN., <https://cutt.ly/1ipkiRp> [https://perma.cc/J8RY-GQRZ] (last visited Jan. 4, 2021).
66. Andy Kiersz, *These Maps Show the Most Commonly Spoken Language in Every NYC Neighborhood, Excluding English and Spanish*, BUS. INSIDER (Jan. 7, 2020, 8:59 AM), <https://cutt.ly/qjmkHpp> [https://perma.cc/6YGT-6TUW].
67. See Kevin Quealy, *The Richest Neighborhoods Emptied Out Most as Coronavirus Hit New York City*, N.Y. TIMES (May 15, 2020), <https://cutt.ly/djodrMU> [https://perma.cc/2583-7J8R].
68. Stephon Johnson, *Eviction Victory: Albany Extends Moratorium*, AMSTERDAM NEWS (Dec. 31, 2020), <https://cutt.ly/qjoHjAo> [https://perma.cc/RD54-4BM9]; Yancey Roy, *NY Lawmakers Approve Sweeping Anti-Eviction Bill Amid COVID-19 Spike*, NEWSDAY (Dec. 28, 2020), <https://cutt.ly/KjoGV0a> [https://perma.cc/93ER-9LNH]; Press Release, New York State, Governor Cuomo Signs Executive Order Extending Moratorium On COVID-Related Commercial Evictions Through January 1 (Oct. 20, 2020), <https://cutt.ly/QhwGOvB> [https://perma.cc/DYG2-JMJJ].
69. Dana Rubinstein & Jazmine Hughes, *New York Halted Evictions. But What Happens When the Ban Ends?* N.Y. TIMES (Jan. 1, 2021), <https://cutt.ly/MjodoQq> [https://perma.cc/7R8Z-479K]. See also Samuel Stein et al., *Housing is Health Care: Tenants' Struggle for Affordability Amidst Recession and Pandemic*, COMMUNITY SERVICE SOCIETY (Dec. 23, 2020), <https://cutt.ly/ljodgbU> [https://perma.cc/9KQQ-Y36H]; STOUT, ANALYSIS OF CURRENT AND EXPECTED RENTAL SHORTFALL AND POTENTIAL EVICTIONS IN THE U.S. 36 (Sept. 25, 2020), <https://cutt.ly/ujodk3V> [https://perma.cc/ZZ8R-W9AQ].
70. Rebekah F. Ward, *Landlords Are Threatening Renters, Despite the Eviction Moratoriums*, DOCUMENTED (Nov. 9, 2020), <https://cutt.ly/8jodcgW> [https://perma.cc/WQA8-KYD4]; Jacob Kaye, *'Truly Shocking': Tenants Rally Against Landlord Harassment in Astoria*, QNS (Nov. 19, 2020), <https://cutt.ly/1jodbuY> [https://perma.cc/BE87-HLUD]; Allison Dikanovic et al., *Tapped-Out Tenants Take Charge as Landlords Pursue End Runs Around Eviction Moratorium*, THE CITY (Nov. 12, 2020), <https://cutt.ly/0hwGV5P> [https://perma.cc/Y35P-EZ2S].
71. Amandolare et al., *supra* note 45 (detailing the devastating loss of income and food insecurity among immigrant New Yorkers since the start of the pandemic); Valeria Ricciulli, *NYC Immigrants Fear Losing Their Homes During the Pandemic*, CURBED (May 27, 2020 12:40 PM), <https://cutt.ly/gjodTUG> [https://perma.cc/75YE-L8XR].
72. MAKE THE ROAD NEW YORK, 150 DAYS LATER: UNEMPLOYED & EXCLUDED, *supra* note 5.
73. These recommendations are drawn from and described in greater detail in *Right to a Roof*, a joint publication with Association for Neighborhood & Housing Development, Center for NYC Neighborhoods, Community Service Society, Mutual Housing Association of NY, Make the Road New York, Vocal-NY, New York Communities for Change, RiseBoro Community Partnership, and Community Voices Heard. See RIGHT TO A ROOF, <https://cutt.ly/hkVJs9P> [https://perma.cc/ADL7-XBPS].
74. Such agencies include Housing Preservation & Development, NYCHA, HRA, Buildings, City Planning,



- Economic Development Corporation, Housing Development Corporation, and the Human Rights Commission.
75. Mandatory Inclusionary Housing is a zoning tool developed by the Department of City Planning and the Department of Housing Preservation and Development, which requires developers to include affordable housing in areas that are rezoned to allow for more housing development.
 76. See Eric Kober, *De Blasio's Mandatory Inclusionary Housing Program: What is Wrong, and How It Can Be Made Right*, MANHATTAN INST. (Jan. 16, 2020), <https://cutt.ly/Ejokwb3> [https://perma.cc/Y6JT-5QMZ]. See also Lynn Ellsworth, *It's Time to End Mandatory Inclusionary Housing. Here Are Some Alternatives*, CITY LIMITS (Dec. 23, 2020), <https://cutt.ly/Ujocx99> [https://perma.cc/F3MM-ZLYE].
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 78. NANCY RANKIN & OKSANA MIRONOVA, CMTY. SERV. SOC'Y, MAKING THE RENT TRULY AFFORDABLE: WHY OPERATING SUBSIDIES BELONG IN NEW YORK CITY'S AFFORDABLE HOUSING TOOLKIT (Nov. 2018), <https://cutt.ly/tjodFHq> [https://perma.cc/8RTC-YBMR].
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 83. NYU FURMAN CTR., HOW DO SMALL AREA FMRS AFFECT THE LOCATION AND NUMBER OF UNITS AFFORDABLE TO VOUCHER HOLDERS? (Jan. 5, 2018), <https://cutt.ly/wjod2yo> [https://perma.cc/5KTN-F32R].
 84. Shawntel Williams, *It's Time to Fix the City's Rental Assistance Vouchers*, CITY LIMITS (Oct. 30, 2020), <https://cutt.ly/PkvOOg8> [https://perma.cc/EBX3-7DKT] (noting that, at current payment levels, the CityFHEPS voucher falls close to \$500 below fair market rent).
 85. *Ending Veteran Homelessness*, NYC DEP'T OF VETERANS' SERV., <https://cutt.ly/Zjod95G> [https://perma.cc/XY7U-D5NR] (last visited Jan. 2, 2021) (outlining the City's three-step approach to housing formerly homeless veterans involving direct peer-to-peer assistance, targeted housing supply, and aftercare assistance).
 86. See Anthony Noto, *These are the Real Estate Developers Mayor de Blasio has Called on for Donations*, N.Y. BUS. J. (Apr. 19, 2019), <https://cutt.ly/Zjod434> [https://perma.cc/D6WH-CNFR]; Derek Kravitz, *Bill de Blasio, Friend of Real-Estate Developers?*, NEW YORKER (Sept. 11, 2013), <https://cutt.ly/Gjod6uo> [https://perma.cc/M9L3-BD5E].
 87. Community Land Trusts (CLT) are non-profit organizations that treat land as a public good. The CLT owns the land and works to ensure it is used in ways that benefit the community. See *Frequently Asked Questions, What are Community Land Trusts (CLTs)?*, NYC CMTY. LAND INITIATIVE, <https://cutt.ly/1jofwd2>



- [<https://perma.cc/9GXS-Z4DH>] (last visited Jan. 2, 2021).
88. Launched in 2016, the Homeowner Help Desk assists homeowners at risk of displacement, scams, and other threats to affordability. See *Homeowner Help Desk*, CTR. FOR NYC NEIGHBORHOODS, <https://cutt.ly/jjofyz1> [<https://perma.cc/756V-YP4Z>] (last visited Jan. 2, 2021).
 89. The HomeFix program, administered through the NYC Department of Housing & Preservation Development, provides a comprehensive place-based approach to addressing homeowner repairs and other assistance. HomeFix also provides access to affordable low or no-interest and potentially forgivable loans for home repairs to eligible owners of one to four-family homes in the five boroughs. See *HomeFix*, NYC HOUS. PRES. & DEV., <https://cutt.ly/kjofs8R> [<https://perma.cc/XMJ3-VSXZ>] (last visited Jan. 2, 2021).
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 91. Under the 7A program, the Housing Part of the NYC Civil Court appoints administrators to operate privately-owned buildings that have been abandoned by their owners. In some 7A buildings, HPD offers a limited amount of 7A Financial Assistance to repair or replace major systems or make other repairs. *7A Program*, NYC HOUS. PRES. & DEV., <https://cutt.ly/mjofk5M> [<https://perma.cc/8DSH-86XM>] (last visited Jan. 2, 2021).
 92. *Alternative Enforcement Program (AEP)*, NYC HOUS. PRES. & DEV., <https://cutt.ly/bjofz9G> [<https://perma.cc/8DSH-86XM>] (last visited Jan. 2, 2021).
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 95. See Gary He, *NYC Restaurant Workers Pushed to Food Pantries and Homelessness While Jobs Remain Scarce*, EATER NEW YORK (Aug 14, 2020, 10:05 AM), <https://cutt.ly/CjplPB> [<https://perma.cc/D52S-DSJ8>]; Juliana Kim, *Nail Salons, Lifeline for Immigrants, Have Lost Half Their Business*, N.Y. TIMES (Nov. 23, 2020), <https://cutt.ly/Ujplgxw> [<https://perma.cc/U54V-LEK9>]; Natasha Abellard, *NYC's Struggling Street Vendors Confront Their Worst-Ever Crisis*, BLOOMBERG CITYLAB (Dec. 10, 2020, 11:55 AM), <https://cutt.ly/Ajplbiy> [<https://perma.cc/3A43-TAM5>].
 96. See Resources for Immigrant Communities During COVID-19 Pandemic, NYC MAYOR'S OFF. OF IMMIGRANT AFFS., <https://cutt.ly/sjplQ43> [<https://perma.cc/9ZF5-272K>] (last modified Dec. 14, 2020).
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101. See Bill Miller, *Immigrant Workers Exploited During Pandemic, Group Says*, THE TABLET (Dec. 4, 2020), <https://cutt.ly/Bjpl0BI> [https://perma.cc/8WZQ-VYDD].
102. CTR. FOR POPULAR DEMOCRACY, *supra* note 100 at 4.
103. See Luis Feliz Leon, *Cleaning New York Subways, Immigrant Workers Find Abuse*, THE AM. PROSPECT (Dec. 17, 2020), <https://cutt.ly/djpl77D> [https://perma.cc/YN4K-ML3J]; Jaya Saxena, *Survey Finds That Pandemic Has Exacerbated Sexual Harassment of Tipped Workers*, EATER NEW YORK (Dec. 1, 2020, 1:23 PM), <https://cutt.ly/jjpl6Lp> [https://perma.cc/K5DV-83Z8].
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105. See *Resources for our Immigrant Communities*, N.Y. CITY COUNCIL, <https://cutt.ly/3jpyzmt> [https://perma.cc/ULF9-JCK7] (last visited Jan. 3, 2021).
106. KATE ANDRIAS & ALEXANDER HERTEL-FERNANDEZ, ROOSEVELT INSTITUTE, *ENDING AT-WILL EMPLOYMENT: A GUIDE FOR JUST CAUSE REFORM 4* (Jan. 2021), <https://cutt.ly/akvvuox> [https://perma.cc/MJ4T-KRBH].
107. *Id.* at 5.
108. *Id.*
109. On January 5, 2021, Mayor de Blasio signed into law legislation that will effectively end at-will employment for fast food restaurants in New York City, prohibiting them from discharging or reducing an employee's hours by more than fifteen percent without "just cause," beginning on July 4, 2021. See NEW YORK CITY, N.Y. CODE § 20-1271 et seq.; see also Press Release, City of New York, *Mayor de Blasio Signs "Just Cause" Worker Protection Bills for Fast Food Employees* (Jan. 5, 2021), <https://cutt.ly/QkvMxIP> [https://perma.cc/E2LE-HAQQ]; Jaime DeJesus, *De Blasio Signs Bill Sponsored by Lander to Protect Fast Food Workers*, BROOKLYN REPORTER (Jan. 7, 2021), <https://cutt.ly/Ykvcndu> [https://perma.cc/JS7P-A63T]. The City should adopt similar legislation to cover workers across all industries.
110. The economic value of literacy and educational achievement is clear. See JONATHAN ROTHWELL, BARBARA BUSH FOUND. FOR FAM. LITERACY & GALLUP, *ASSESSING THE ECONOMIC GAINS OF ERADICATING ILLITERACY NATIONALLY AND REGIONALLY IN THE UNITED STATES 3* (Sept. 2020), <https://cutt.ly/ljpbCSy> [https://perma.cc/9S9P-4FFJ] (showing adults with the highest literacy level earn nearly \$40,000 more annually than those at the lowest level); *Learn More, Earn More: Education Leads to Higher Wages, Lower Unemployment*, U.S. BUREAU OF LAB. STAT. (May 2020), <https://cutt.ly/TjpbBic> [https://perma.cc/4WKK-6JUS] (showing median wages for adults with a high school diploma are 26% greater than for those without one); ANTHONY P. CARNEVALE, ET AL., GEORGETOWN U. CTR. ON EDUC. & WORKFORCE, *THE COLLEGE PAYOFF: EDUCATION, OCCUPATIONS, LIFETIME EARNINGS 2* (2014), <https://cutt.ly/CjpbMFy> [https://perma.cc/28PJ-23CN] (showing workers with bachelor's degrees will earn about a million dollars more over the course of their lifetime on average than those with only high school diplomas).
111. *About*, LITERACY ASSISTANCE CTR. <https://cutt.ly/sjpbONn> [https://perma.cc/VJZ8-ATUE] (last visited Jan. 6, 2021).
112. Many, for example, are working on the front lines to prepare and deliver goods; these are tasks that cannot be done from a stationary desk. Elise Gould & Heidi Shierholz, *Not Everybody Can Work From Home*, ECON. POL'Y INST. (Mar. 19, 2020, 1:15 PM), <https://cutt.ly/Xjpb8TN> [https://perma.cc/3Q8L-M948].
113. This may in part be attributed to lower income students having less "access to high-quality remote learning or to a conducive learning environment, such as a quiet space with minimal distractions, devices



- they do not need to share, high-speed internet, and parental academic supervision.” Emma Dorn et al., *COVID-19 and Student Learning in the United States: The Hurt Could Last a Lifetime*, MCKINSEY & CO. (Jun. 1, 2020), <https://cutt.ly/9jpxt9d> [https://perma.cc/RD3T-MAQ7].
114. STATE OF OUR IMMIGRANT CITY, *supra* note 1, at 13, <https://cutt.ly/UjpxaFS> [https://perma.cc/UW4T-A3T9].
115. NYC COAL. FOR ADULT LITERACY, <https://cutt.ly/MjpxdOD> [https://perma.cc/6W2E-7CRN] (last visited Jan. 5, 2021).
116. Miriam Jordan, *Children from Immigrant Families are Increasingly the Face of Higher Education*, N.Y. TIMES (last updated Nov. 2, 2020), <https://cutt.ly/ljpxjwR> [https://perma.cc/N62G-AZ8F].
117. Indeed, as the Supreme Court has explained, “by depriving the children of any disfavored group of an education, we foreclose the means by which that group might raise the level of esteem in which it is held by the majority . . . Illiteracy is an enduring disability. The inability to read and write will handicap the individual deprived of a basic education each and every day of his life. . . . The stigma of illiteracy will mark them for the rest of their lives. By denying these children a basic education, we deny them the ability to live within the structure of our civic institutions, and foreclose any realistic possibility that they will contribute in even the smallest way to the progress of our nation.” *Plyer v. Doe*, 457 U.S. 202, 222–23 (1982).
118. See LITERACY ASSISTANCE CTR., *LITERACY & JUSTICE: OUR CALL FOR INVESTMENT* (Jan. 2021), <https://cutt.ly/FkvXdI9> [https://perma.cc/2PEB-ADX4].
119. See SIERRA STONEMAN-BELL & IRA YANKWITT, LITERACY ASSISTANCE CTR., *INVESTING IN QUALITY: A BLUEPRINT FOR ADULT LITERACY PROGRAMS AND FUNDERS* 28–33 (Dec. 2017), <https://cutt.ly/7jpxxG6> [https://perma.cc/7M9Y-T6G8].
120. JONATHAN ROTHWELL, PHD, GALLUP, *ASSESSING THE ECONOMIC GAINS OF ERADICATING ILLITERACY NATIONALLY AND REGIONALLY IN THE UNITED STATES* 4 (Sept. 8, 2020), <https://cutt.ly/EjpxmVW> [https://perma.cc/9S9P-4FFJ].
121. *Access Training*, NYC SMALL BUS. SERVS., <https://cutt.ly/ZjpxE7K> [https://perma.cc/WJN3-ZHSQ] (last visited Jan. 6, 2021).
122. Reema Amin, *Pandemic’s Toll on NYC Schools Serving New Immigrants: Fewer Students, Less Money, Waning Services*, CHALKBEAT N.Y. (Dec. 17, 2020, 5:23 PM), <https://cutt.ly/OjpxlZa> [https://perma.cc/95SP-NQ7Z].
123. See Reema Amin, *Here’s How One School is Trying to Help New Immigrants Get to College During the Pandemic*, CHALKBEAT N.Y. (Nov. 18, 2020, 1:24 PM), <https://cutt.ly/wjpxP9r> [https://perma.cc/7P7D-7W5E] (highlighting the additional challenges to college access for immigrant youth that have resulted from the pandemic and remote schooling, and providing an example of how one school is addressing these challenges).
124. Josefa Velasquez, *Some Undocumented Students Find Letdown at End of NY DREAM Act Rainbow*, THE CITY (Jan. 14, 2020, 4:05 AM), <https://cutt.ly/WjpxYi2> [https://perma.cc/LXJ5-MHTZ].
125. Madina Touré & Nick Niedzwiadek, *8 Months Later, Success of DREAM Act Hard to Measure*, POLITICO (Dec. 5, 2019, 5:01 AM), <https://cutt.ly/WjpxUcV> [https://perma.cc/H73V-XADH].
126. *Jobs and Internships, SYEP Summer Bridge 2020*, NYC DEP’T OF YOUTH AND CMTY. DEV., <https://cutt.ly/5klk2N8> [https://perma.cc/W827-2JDQ] (last visited Feb. 4, 2021).

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