



IMMIGRATION COUNSELING SERVICE

SINCE 1978. A NON-PROFIT LAW FIRM PROVIDING IMMIGRATION LEGAL SERVICES TO PERSONS FLEEING PERSECUTION, FAMILIES SEPARATED BY BORDERS AND THOSE SEEKING A PATH TO CITIZENSHIP

February 14, 2023

Governor Kotek  
Senate President Rob Wagner  
Speaker of House of Representatives Dan Rayfield  
Members of the Oregon Legislature  
900 Court St. NE  
Salem Oregon 97301

Dear Elected Officials:

RE: SB 606 - Oregon Nonprofit Modernization Act

Immigration Counseling Service (ICS) asks you to pass SB 606, the Oregon Nonprofit Modernization Act. Your support is critical to the health of the nonprofit sector and the communities we serve.

ICS is Oregon's oldest, and only, independent non-profit law firm providing affordable legal services to immigrants and refugees. Our mission is to achieve equity and justice for immigrants and their families by providing accessible services to uphold their legal rights. Through deliberate and direct engagement, ICS brings immigrant voices and experiences to the decision-making table. We honor and respect the contributions made by immigrants to keep our economy strong and our communities vibrant. We serve all 36 counties in Oregon.

ICS's ability to hire and retain qualified legal workers with personal and professional backgrounds in immigration is foundational to our work. The compounding economic impacts of the ongoing pandemic and the current hyper-inflation environment have invalidated ICS's historic finance model, which relied on low-cost service fees supplemented by government contracts. These funds only ever covered a portion of the services we deliver, and hyper-inflation has significantly deepened the gap between fair market compensation and the salaries and benefits we have been able to provide.


To retain staff and mitigate the loss of institutional knowledge, ICS increased salaries and benefits by 21% in 2022. This increase placed experienced attorneys close to the 50th percentile for attorney salaries in the Portland area, though starting salaries are in the lowest 10th percentile. This salary gap has been exacerbated by state government contracting with for-profit organizations that are able to offer more than \$200/hour for legal services. These organizations do not have the same ties to the community and are pricing us out of the services we have delivered for 45 years.

By passing the Oregon Nonprofit Modernization Act, you can help us retain staff and continue providing essential services and promoting all Oregonians' well-being. Requiring a de minimis administrative rate of 10% or higher would make us less likely to lose money on our government contracts. Eliminating reimbursement as a form of payment for state contracts would ensure that we do not go into debt while waiting for payments on services we have already provided. A retention fund would be essential to investing in our team and building a long-term commitment to our clients. Together, these changes will ensure that immigrants and refugees in Oregon are able to access safe, trusted, and reliable legal services for another 45 years.

ICS appreciates your consideration of SB 606. Please don't hesitate to contact us if you have any questions.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Garcia". The signature is fluid and cursive, with a large initial "F" and "G".

**Frank Garcia**  
Executive Director  
[www.ics-law.org](http://www.ics-law.org)