

Oregon Immigration Legal Needs Report



Contents

- 3 Introduction**
- 4 A Message from the ICS Executive Director**
- 5 Executive Summary**
- 7 Overview of the Immigration Process**
- 8 Brief History of Immigrants in Rural Oregon**
- 9 Snapshot of Immigrants in Oregon in 2019**
- 10 Snapshot of Immigrants in Oregon’s Rural Counties**
 - Rural Oregon’s Increasing Numbers of Indigenous/Mesoamerican Immigrants
 - Rural Oregon’s Immigrant Migrant and Seasonal Farm and Forestry Workers
 - Migrant, LEP and Latino Students
- 14 Access to Immigration Legal Services Brings Stability, Prosperity and Opportunity to Oregon’s Immigrants and Their Communities**
 - Legal Status Dramatically Reduces the Risk of Exploitation and Fear
 - Legal Status and Naturalization Bring Financial Stability and Prosperity
 - Naturalized Citizens Enjoy Better Access to Health Care Coverage
 - Immigrants, Especially Those without Legal Status or Without the Means to Access Legal Services to Gain a Pathway to Legalization, Suffer a Disproportionate Rate of Harm from Ancillary Legal and Social Needs
 - Immigrants Already Make Significant Contributions to Oregon’s Economy; Providing a Pathway to Legalization Will Dramatically Increase Those Contributions
- 19 Legal Representation Makes a Dramatic Difference in Ability to Gain Affirmative Legal Status and in Immigration Court Case Outcomes**
- 21 The Most Significant Immigration Legal Needs Facing Oregon’s Low Income Rural Immigrants**
 - Immigrant Community and Stakeholder Perspective
 - Nonprofit Immigration Legal Services Providers Perspective
- 28 Snapshot of Existing Configuration of Legal Services for Immigrants**
 - Oregon’s Private Immigration Legal Services Attorneys
 - Nonprofit Immigration Legal Services Providers
 - Nonprofit Legal Services Providing Limited Direct Immigration Legal Services
 - Immigration Legal Services Providers—Accredited Representatives
 - Deportation Defense Legal Services
 - Crimmigration Legal Services
- 35 Perceived Characteristics of Private and Nonprofit Legal Services in Rural Communities**
- 37 Return on Investment for Funding of Nonprofit Immigration Legal Services**
- 38 Immigrants Access Information About Immigration and Immigration Legal Services Through Trusted Connections**
- 42 Gaps In and Barriers to Legal Services**
- 46 How COVID-19 Has Impacted Immigrants and the Immigration Nonprofit Legal Services Providers**
- 48 Oregon’s Legal Community Shoulders Some Responsibility for the Gaps in Immigration Legal Services**
- 50 Recommendations**
- 55 Appendices**

Introduction

LexTerra Strategies is pleased to provide this Immigration Legal Needs Assessment Report to Immigration Counseling Service. With generous funding from the Oregon Immigrant and Refugee Funders' Collaborative, this report delves deeper into issues brought forth in the 2018 civil legal needs report commissioned by the Oregon State Bar and Oregon Law Foundation, identifying immigration as the most harmful civil legal issue affecting low-income Oregonians—a staggering 70% of Oregonians surveyed reported that an immigration case had a “very negative effect on their lives.”

The 2018 Oregon State Bar study, however, did not focus on immigration legal needs or immigrants specifically. In an effort to gain a clearer understanding of the needs of Oregon's immigrants, Immigration Counseling Service (ICS) commissioned LexTerra Strategies to conduct a more in-depth, though limited, study, based on data and findings from that 2018 study, focused on the immigration legal needs of Oregon's rural immigrants.

This report is a compilation of multiple data sources, including: desk reviews of census and other demographic data sets; a series of interviews with immigrants and rural community members working with immigrants; a statewide online survey of mainly rural immigrants and individuals working with immigrants; and focus groups. This report is not intended to be an exhaustive, comprehensive, or scientific study; but rather endeavors to provide a clearer snapshot of several important aspects of immigrants' lives in Oregon as of 2019, with particular focus on Latino, rural immigrants outside the Portland-metro tri-county area.

The report contains several findings and recommendations that will hopefully contribute to a more informed discussion of the contributions of rural immigrants and their immigration legal needs, and to create a more centralized and systematic approach to providing resources to build capacity for them to fully participate in community life in Oregon.



Lisa LeSage, JD, LLM
Principal

The key objectives of this *Immigration Legal Needs Report* is to build upon the *2018 Oregon Civil Legal Needs Report* to:

- Collect information on existing immigration legal services for immigrants in rural Oregon;
- Identify gaps in current legal services accessibility and delivery;
- Gain insight into characteristics of immigrant communities in rural Oregon and their ancillary needs;
- Obtain stakeholder input on how social and legal services providers can better coordinate to enhance access to immigration legal services; and
- Provide recommendations for funding, collaboration, and allocation of resources to increase access to justice, specifically to legal immigration services, for Oregon immigrants, especially those in rural areas.

This research made possible with support from the Oregon Immigrant & Refugee Funders Collaborative.

ICS
A Non-Profit
Immigration Law Firm

A Message from the Executive Director



It is a long overdue privilege to provide you with this timely Immigration Legal Needs Study focused on rural Oregon. This study is an important intentional step toward increasing awareness and understanding of immigrants' legal needs and clarifying the gaps in access to legal immigration services in rural Oregon.

A note about the use of the term “Latino”—throughout this report, we intentionally use the terms “Latino” and “Indigenous/Mesoamerican.” As an Oregon native a descendant of rural immigrant farmworkers, I recognize that there is ongoing debate about which terms are best in our current environment. This debate is not new and will continue, as some of these terms are still recognized by some immigrants as derogatory. The term “Latino” was created by the Latino community as a rejection of the term “Hispanic,” which was created by the U.S. Government decades ago. In recognition of this history, we have intentionally chosen not to advocate one new term over another. When applying “Latino” in the plural (“they”) form, it becomes gender neutral which is a leading historical practice of inclusivity, equality and equity. We use “Indigenous/Mesoamerican” to recognize a population that has been centered within Oregon’s immigrant population for decades, and we believe their voices should be shared and advanced equitably.

As ICS Executive Director, I have been able to confirm that a “scarcity culture” exists within the public interest law immigration space and the immigrant community we serve. This culture is derived from a scarcity of resources, a scarcity of attention, and a scarcity of leadership addressing a community continuously under attack and forced to live daily in fear in the shadows of our society. The data in this report affirms these assertions of scarcity and makes a compelling argument that we must act now and with intention in identifying statewide polices, programs and affirmative legal services to address this growing societal problem that will not only hurt individuals and communities directly affected by immigration, but entire communities across our state.

The data gathered in this report is intended to inform policy makers, advocates, researchers, foundations and community-based organizations, in order to promote more robust immigrant rights’ centered engagement and policy, legal programming and advocacy, and prosperous outcomes. We invite you to join us. *Adelante!*

A handwritten signature in black ink that reads "Frank Garcia". The signature is written in a cursive, flowing style.

Frank Garcia

Executive Director, Immigration Counseling Service

Executive Summary

Why is access to high quality, low-cost immigration legal services so important?

Immigration status is the fundamental portal through which an immigrant acquires the most basic of human rights—to freedom from violence, access to healthcare and educational opportunities, and the ability to earn a living wage. Without status, immigrants and their families are condemned to living in a society’s shadows, ripe for exploitation and discrimination, and condemned to a life of poverty, sickness, lack of education and unrelenting fear.

Access to high-quality, low-cost proactive immigration legal services is the only key to unlocking this portal. Unlike other civil legal services for low-income individuals—although vitally important—immigration legal services do much more than provide a solution to a particular legal problem. Legal status and naturalization bring financial stability and prosperity not only to individual immigrants and their families but also to the communities to which they contribute, and those with status have better access to health care coverage and higher rates of education. Those without legal status suffer a disproportionate rate of harm from ancillary legal and social needs.

In 2017 the Trump Administration began issuing increasingly harsh immigration policies, thrusting the issue of access to immigration legal services directly into the nation’s consciousness. As legal pathways to immigration and protection for refugees have become blocked, immigrants are inhumanely warehoused in detention centers, and families are torn apart. Access to affirmative, proactive, legal services has become even more important for Oregon’s immigrants and make a substantial difference in administrative and immigration court outcomes.

THE FOCUS OF THIS REPORT

Oregon is a state of immigrants, the majority of whom are from Central America and Mexico. Most arrived here as farm and migrant workers, and many increasingly have settled outside the Portland tri-county metropolitan area.

Oregon’s four nonprofit immigration legal services organizations exclusively devoted to providing a wide range of affirmative and defensive legal services, and most private immigration lawyers, are all located in the Portland metro area. Nearly half of Oregon’s immigrants reside outside Multnomah, Clackamas and Washington Counties, however, and suffer much higher rates of deportation. Therefore, we chose to limit this study to the legal needs of immigrants outside the Portland metro tri-county area.

Oregon’s four nonprofit immigration legal services organizations exclusively devoted to providing a wide range of proactive and defensive immigration legal services:

Catholic Charities Immigration Legal Services

Immigration Counseling Service (ICS)

Lutheran Community Services NW (LCSNW)

**Ecumenical Ministries Sponsors
Organized to Assist Refugees (SOAR)**

Over 10% of Oregonians are immigrants, and 25% of children have one or more foreign-born parent. Oregon’s rural counties are surprisingly diverse, and an increasing number of Indigenous/Mesoamerican immigrants have settled in areas such as Lincoln, Hood River, Umatilla, and Linn-Benton Counties. Although there are many definitions of “rural” this study focuses on counties in six regions in Oregon to offer a better picture of immigrants, their immigration-related legal needs, and barriers to accessing legal services. These six areas are: Northeastern Oregon, the Columbia River Gorge, Central Oregon, Southern Oregon, the Central Willamette Valley, and the Central/North Oregon Coast.

THE FINDINGS IN THIS REPORT RELATED TO IMMIGRATION LEGAL NEEDS ARE NUMEROUS AND SERIOUS

Study participants identified immigration legal issues related to work authorization, immigration status of an individual or family member, deportation proceedings, and DACA as among the most important. Other immigration-related legal needs deemed important were problems related to not having a driver's license, fear of calling police or going to court because of ICE, fear of asking for or receiving government benefits because of ICE, problems related to not having a Social Security number, and fear of complaining to a landlord or employer because of ICE.

Nonprofit immigration legal services providers reported that the most significant problems they are currently facing include: constantly changing law and policies; increased roadblocks created by the current Administration that stymie and slow the visa administrative process; cessation of the practice of prosecutorial discretion; lack of minimal due process in asylum cases and decrease in asylum success rates; increased rejection of crime, trafficking and domestic violence victim visa applications; the imposition of the "public charge" rule; and increased rates of ICE enforcement and disproportionate rates of deportation for rural immigrants.

COST REMAINS THE MOST SIGNIFICANT BARRIER TO ACCESSING LEGAL SERVICES

The Administration has raised visa fees significantly, and this factor, coupled with the economic devastation caused by the COVID-19 health emergency, has made it almost impossible for those immigrants who struggle to pay even the minimal legal fees charged by nonprofits to afford the pathway to legalization. Immigration legal services providers also suffer from a severe lack of public and private resources. Other significant barriers, especially for rural immigrants, include fear of ICE and lack of knowledge about their rights and how to access existing services, many of which are outside of the communities where they live.

TOP RECOMMENDATIONS WITH THE MOST URGENCY INCLUDE

- 1.** Secure a prominent seat at the policymaking table for immigrants in Oregon, so that better data can be collected, coordinated, and disseminated;
- 2.** Facilitate increased collaborations between rural immigrant social services providers and immigration legal services;
- 3.** Meaningfully engage more of the players in Oregon's justice system—courts, bar associations, and legal aid providers—with the nonprofit immigration legal services providers; and
- 4.** Increase funding, especially for outreach and paralegal positions within culturally appropriate and trusted nonprofits in rural communities that are responsive to the needs of immigrants who live there.

A 2018 study commissioned by the Oregon Law Foundation concluded that for every \$1 invested in Oregon's nonprofit legal services providers, the citizens of Oregon receive almost \$5 of immediate and long-term consequential and financial benefits. Now is the time for policymakers, justice sector actors, and funders to seize the opportunity to work together with nonprofit immigration legal services providers in meeting the immigration legal needs of Oregon's immigrants. There is urgency in this call to action since Oregon immigrants are disproportionately impacted by the COVID-19 health crisis, both health-wise and financially, and extending legal services to the most vulnerable may mitigate some of these impacts since we know that through legal status, immigrants are more likely to access healthcare and community services.

Overview of the Immigration Process

In the United States, individuals can obtain non-temporary legal immigration status through one of two routes:

1. Through the affirmative process, which involves submitting a formal application through an administrative agency, or
2. In a “defensive” process, once someone has been summoned to immigration court.

HOW PEOPLE OBTAIN LEGAL STATUS THROUGH AFFIRMATIVE PROCESSES

USCIS (U.S. Citizenship and Immigration Services) is a component of the U.S. Department of Homeland Security and the federal agency that oversees lawful immigration to the United States. USCIS is charged with managing the visa application process, including affirmative applications for citizenship, permanent residency, work permits, petitions for immigrating family members, processing applications for foreign adoptions, and making determinations on applications for humanitarian visas such as asylum. USCIS also administers some humanitarian programs and manages the system employers use to verify employment eligibility of new employees (E-verify). (The terms “affirmative legal services” and “proactive legal services” are used interchangeably in this report.)

“DEFENSIVE” ROUTES TO GAINING LEGAL STATUS

Individuals may be in immigration proceedings for a variety of reasons, including arrest by ICE or by being detained at the U.S. border. The Executive Office for Immigration Review (EOIR) manages the immigration courts. Created in 1983, the EOIR is an arm of the U.S. Department of Justice under the direction of the Attorney General and charged with adjudicating immigration cases. It contains three components: 1) the Office of the Chief Immigration Judge, which manages immigration courts throughout the United States; 2) the Board of Immigration Appeals (BIA), which considers appeals from individual immigration court rulings; and 3) the Office of the Chief Administration Hearing Officer, responsible for adjudicating immigration employment-related cases. The EOIR is independent of the enforcement mechanisms of the Department of Homeland Security.

Judges in immigration court proceedings are not part of the judicial branch of the United States government and are not independent decision-makers, but rather are attorney employees of the U.S. Justice Department who work for the Attorney General of the United States. They are empowered to make final determinations about an individual’s eligibility to enter or be removed from the United States. If judges determine a person is inadmissible or deportable, they do have the power to grant specific types of relief, such as asylum, cancellation of removal, adjustment of status or voluntary departure.

Because immigration court proceedings are civil rather than criminal, individuals are entitled to have an attorney present, but are not entitled to have a court-appointed attorney and must pay for representation. Even children in deportation proceedings are not entitled to court-appointed attorneys.

IMMIGRATION ENFORCEMENT

U.S. Immigration and Customs Enforcement (ICE) is a division of the Department of Homeland Security responsible for enforcing U.S. Immigration law. ICE is responsible for managing all aspects of immigration investigations and removal operations. With a budget of \$8 billion, it currently employs over 20,000 law enforcement personnel in over 400 offices.

Brief History of Immigrants in Rural Oregon

Immigrants from all over the world, especially Central America and Mexico, have come to Oregon over the past several hundred years, to work in the railroads, shipyards, farms and forests. Approximately 70 years ago, due to the bracero programs and other factors after World War II, the number of immigrants coming to Oregon from Central America and Mexico increased dramatically, primarily due to available work in the state's agricultural and forestry industries. These immigrants settled in communities throughout Oregon, where they and the next generations have contributed to the vibrancy of rural and urban life. Latinos now make up the largest demographic of immigrants in Oregon.

This migration from Mexico and Central America has continued, contributing to an ongoing rise in the number of mixed-status families (meaning families with at least one member who is undocumented). Over the past 25 years, immigrants have been moving to rural Oregon communities in greater numbers, as they have found access to more affordable housing and work in agriculture and forestry, construction, and the hospitality/recreation industries that support these communities. Within the past 15 years, there also has been a significant increase in the number of Indigenous/Mesoamerican immigrants arriving from areas with distinctive cultural and language differences from other primarily Spanish-speaking Mexican and Central American communities.



Snapshot of Immigrants in Oregon in 2019

Immigrants have played a major role in building Oregon's communities. The most recent census estimates from 2018 reveal that at least 10.3% of Oregon's population is foreign-born. "Foreign born" refers to people residing in the United States at the time of the population survey who were not U.S. citizens at birth. The foreign-born population includes naturalized U.S. citizens, lawful permanent residents ("green-card" holders), refugees, asylees, certain legal non-immigrants (including those on student, work, or other temporary visa), and persons residing in the country without formal legal authorization.

Today, over 25% of Oregon children under the age of 18 have one or more foreign-born parents. At least 13,000 DACA recipients reside in Oregon, and one in seven Oregon workers is an immigrant. Furthermore, the majority of Oregon's immigrants are long-term residents. Nearly 85% have been in the United States for 8 years, and of those, almost 60% have been in the U.S. over 18 years.

STATEWIDE SNAPSHOTS

Mixed Status Families. In 2018, an estimated 432,000 foreign-born persons live in Oregon. Approximately 45% are naturalized citizens; 29% have some type of legal status, and an estimated 113,000, or 26%, are undocumented—meaning that a large number of Oregon families have at least one or more member who is undocumented.

Area of Birth. The largest percentage of foreign-born persons in Oregon were born in Mexico, Central and South America. Forty-two percent of Oregon's foreign-born population is Latino. Immigrants from other areas include 33% born in Asia, 14% born in Europe, 3% born in Northern America, 4% who were born in Africa, and 2% in Oceania.

Age. The vast majority of Oregon's immigrants (81%) are between the ages of 18 and 64.

Children. One-quarter of all children in Oregon under 18 have at least one foreign-born parent, and 33% of children in Oregon under the age of 18 who are living in poverty (under 200% of the Federal Poverty Income Guidelines) have one or more foreign born parent.

Language. There are hundreds of languages spoken in Oregon. Over 15% of Oregonians speak a language other than English at home, and the most frequently spoken language other than English is Spanish. Thirty-five percent of foreign-born Oregon residents over the age of 5 years old report speaking English very well, and 42% speak English "less than very well". Of naturalized citizens, 27% report speaking only English, 39% report speaking English very well, and 34% speak English less than very well. Fifty-five percent of noncitizens report speaking English less than very well, 13% speak only English, and 32% speak English very well.

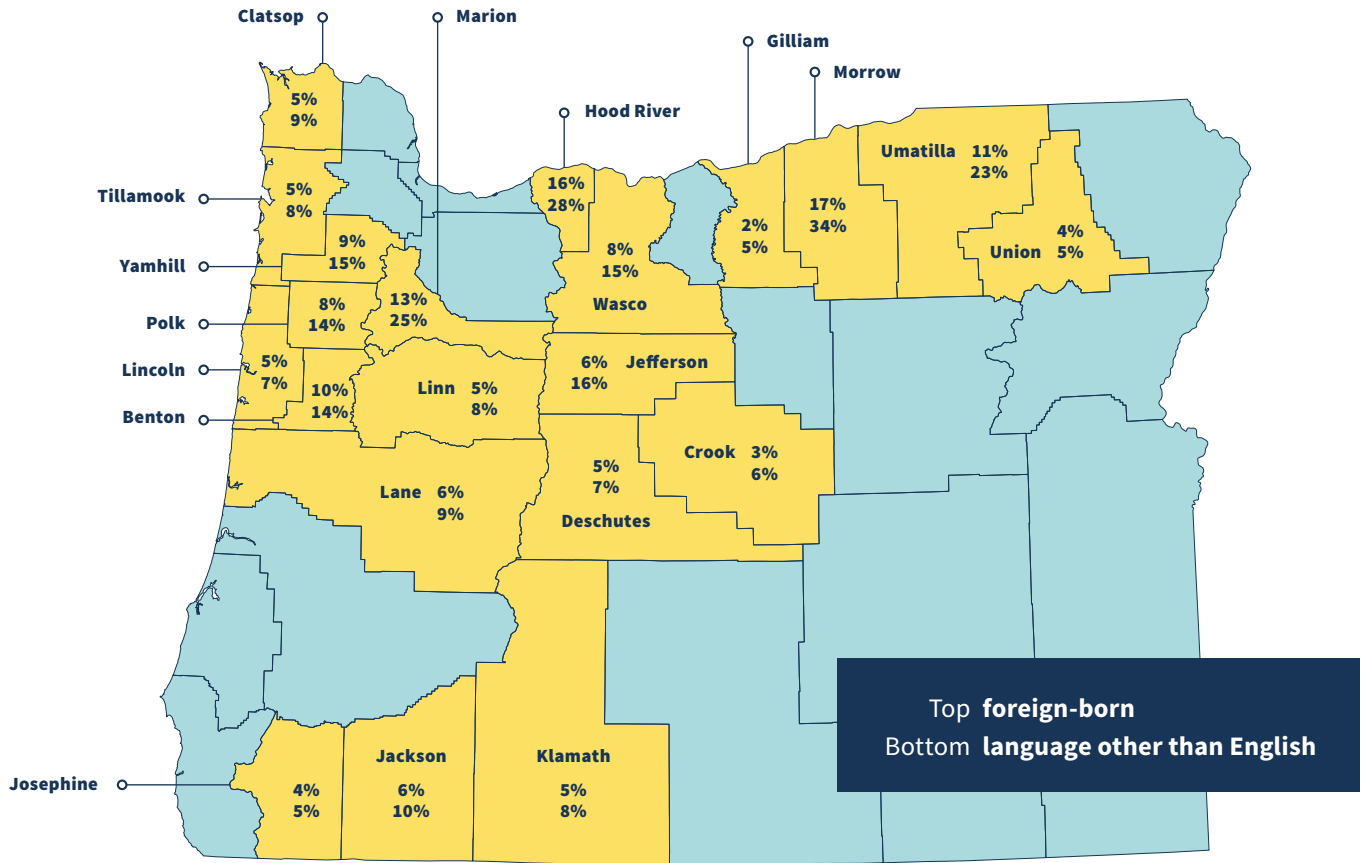
Education. 41% of noncitizens have less than a high school diploma; 19% have a high school diploma or GED, 16% have some college or associate's degree, and 24% have a bachelor's degree or higher. Naturalized citizens have higher levels of education: 19% have a high school diploma or GED; 25% have some college or associate's degree, and 35% have a bachelor's degree or higher.

Labor Force. In 2018, approximately 68% of foreign-born Oregonians over the age of 16 were in the civilian labor force, compared with 62% of U.S. born Oregonians. Within the immigrant population, 70% of noncitizens, and 66% of naturalized citizens, were in the civilian labor force. Most immigrants in the labor force have been in Oregon a long time. Fully 77% of those employed arrived in 2007 or earlier, and only 23% percent arrived in Oregon between 2008 and 2018. Fifty percent of those immigrant workers were born in Latin America, 30% in Asia, 12% in Europe, 4% were born in Africa, 3% in Northern America, and 1% in Oceania.

Foreign-born civilian workers over the age of 25 tend to have lower educations than those of U.S. born workers. For example, 30% of foreign-born workers did not have a high school diploma compared to 5% of all U.S. born workers. Additionally, a significant number of foreign-born workers are less than English-proficient (LEP) than U.S. born, with 45% reporting LEP, compared to less than 1% of all U.S. born workers.

Employment by Industry. More immigrants work in lower-paid, physically demanding jobs than U.S. born individuals. Over 50% of Oregon immigrants in the labor force are employed in just two industries: agricultural-related and manufacturing. An additional 28% are employed in food, recreation, entertainment, and other services; and 16% in construction.

Map 1. Percentage of population that is foreign-born, and speaks a language other than English at home



Snapshot of Immigrants in Oregon’s Rural Counties

Oregon’s counties are surprisingly diverse: Nearly half (over 42%) of Oregon’s foreign born population lives outside the Portland metro tri-county area. Despite this diversity and the richness immigrant populations bring to rural communities, there are significant drawbacks to their rural experience. Those living in rural areas continue to experience challenges to a much greater degree than their urban counterparts, including higher rates of poverty, poorer health outcomes, and a striking lack of access to affordable immigration (and other) legal services.

Poverty is an underlying issue that connects all others. More people are in poverty in rural areas than urban, and this is no different for immigrants living in rural areas. Those who are poor and unable to afford immigration legal services—should they be able to access them—are also much more likely to

suffer from lack of access to health insurance, food and housing stability; and to experience legal issues such as consumer fraud, discrimination and job-related problems. These issues are especially acute for the most marginalized immigrants, including migrant and seasonal farmworkers, Indigenous/Mesoamerican communities, and undocumented immigrants.

Although census figures do not break down household income and poverty by foreign-born and U.S. populations, the percentages of persons and children living in poverty in rural counties shines a light on the extreme challenges immigrants face, as they tend to work in much lower-paying jobs, and have lower salaries, than their U.S. born community members.

See Appendix C, Tables 6-12 for detailed regional statistics.

Rural Oregon’s Increasing Numbers of Indigenous/Mesoamerican Immigrants

The majority of immigrants in all rural counties in Oregon are native Spanish speakers. However, the number of those whose primary language is a Central American or Mexican Indigenous/Mesoamerican language has grown exponentially in recent years, especially in rural areas. One reliable statistic demonstrating these increases is the requests for interpreters through the Oregon Judicial Department Language Access Program. During 2017, requests for Indigenous/Mesoamerican Latin American languages increased by 22.4% from 2016. In 2018, the latest year these statistics were available, the number of requests for Indigenous/Mesoamerican language interpreters increased by 6% to 479.

Requests for Indigenous/Mesoamerican interpreters in outlying rural counties far outnumbered those for the Portland metro tri-county area. Umatilla County logged the most, at 117 requests, followed by Marion with 116. Fully 40% of the requests were for interpreters in the Guatemalan language Mam, and those requests increased 31% over the past year primarily in Umatilla, Marion and Lincoln Counties. Rural school districts are also grappling with changes in language demographics. For example, the Hermiston School District has experienced an influx of students speaking Indigenous/Mesoamerican languages in the last few years, especially the Guatemalan languages Mam, Q’anjob’al and K’iche.

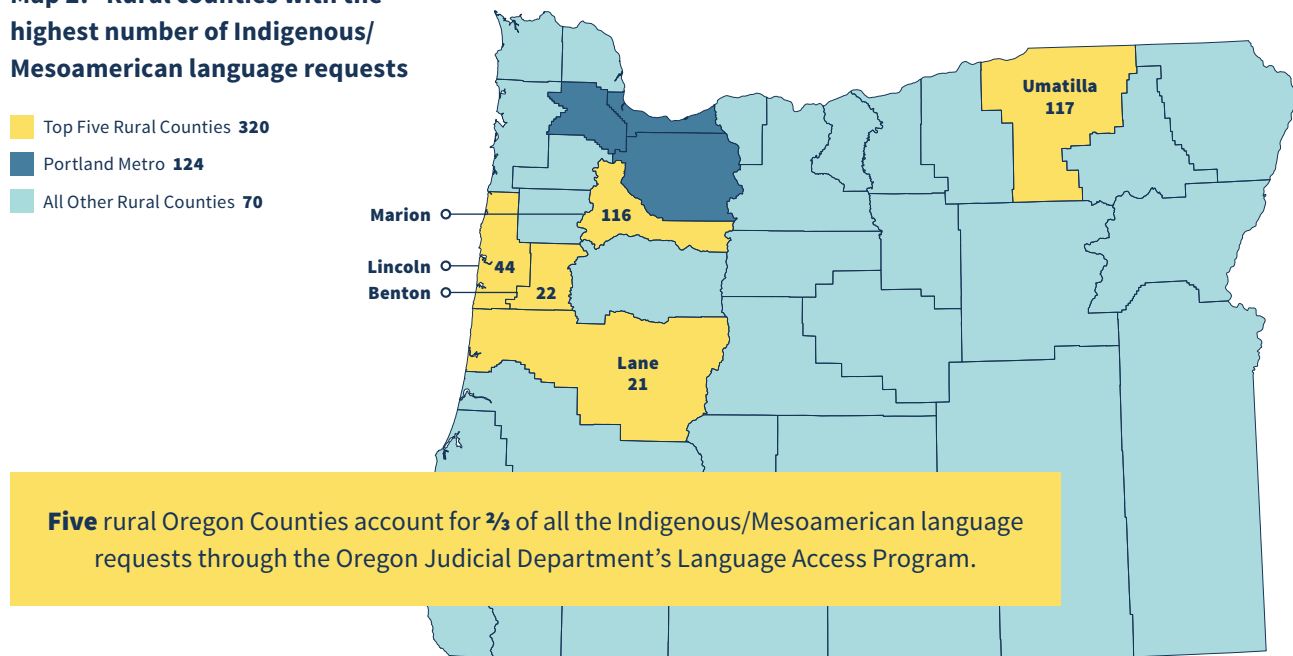
Community members and interpreters alike note that lack of literacy and multiplicity of languages (there are at least 36 Indigenous/Mesoamerican Guatemalan languages alone) create serious challenges, especially in rural areas. Not only are few recently arrived adults older than 35 fully literate, but often interpreters are ill-trained or do not speak the appropriate dialect. Several complained that judges often do not ask immigrants and interpreters to communicate and ensure they understand one another. Further complicating matters is inaccurate translation even of more commonly spoken languages such as Arabic, especially on websites and written notices. Interpreters also reported that many agencies do not use appropriate software to ensure that the translated words actually have meaning once they are on the web. For example, a Washington County campaign encouraging people to wear masks translated into Arabic was “simply unreadable,” according to one interpreter/translator.

Those five rural counties with the highest number of Indigenous/Mesoamerican language requests are shown in Map 2. In Comparison, the Portland metro tri-county area and other rural areas had far fewer requests.

“Now you might think the growth in foreign language speakers would be concentrated in metropolitan areas like Portland, Seattle and Boise. But no. Certain rural places, including Hood River County, Ore...are more likely to have foreign language speaking households than many urban areas.”

—Census Report Reveals Language Trends in Northwest Homes, Oregon Public Broadcasting, Northwest News Network, August 8, 2013

Map 2. Rural counties with the highest number of Indigenous/Mesoamerican language requests



See Appendix C, Table 14 for more information

Rural Oregon’s Immigrant Migrant and Seasonal Farm and Forestry Workers (MSFWs)

For decades, immigrants, especially those from Mexico and Central America, have supplied nearly all of Oregon’s farm (including nursery) and forest labor. Today, although the number of growers applying for foreign-worker H2A permits is rising, year-round Latino MSFWs living in Oregon continue to represent the highest percentage of MSFWs. (The H2A program allows agricultural employers to hire non-immigrant foreign workers on a temporary basis.)

The U.S. Department of Labor ranks Oregon **6th in the nation** as a “Significant MSFW State.”

The U.S. Department of Labor ranks Oregon 6th in the nation as a “Significant MSFW State.” There are no accurate counts of MSFWs in Oregon, nor the percentages living in each county.

According to the latest reports through program year 2017, Oregon has an estimated 85,000 MSFWs; although those figures are believed to be low, and by some estimates may be as high as double that amount. That same year, the Oregon Employment Division MSFW Advocate’s office reported 27,502 separate outreach contacts with MSFWs in Oregon.

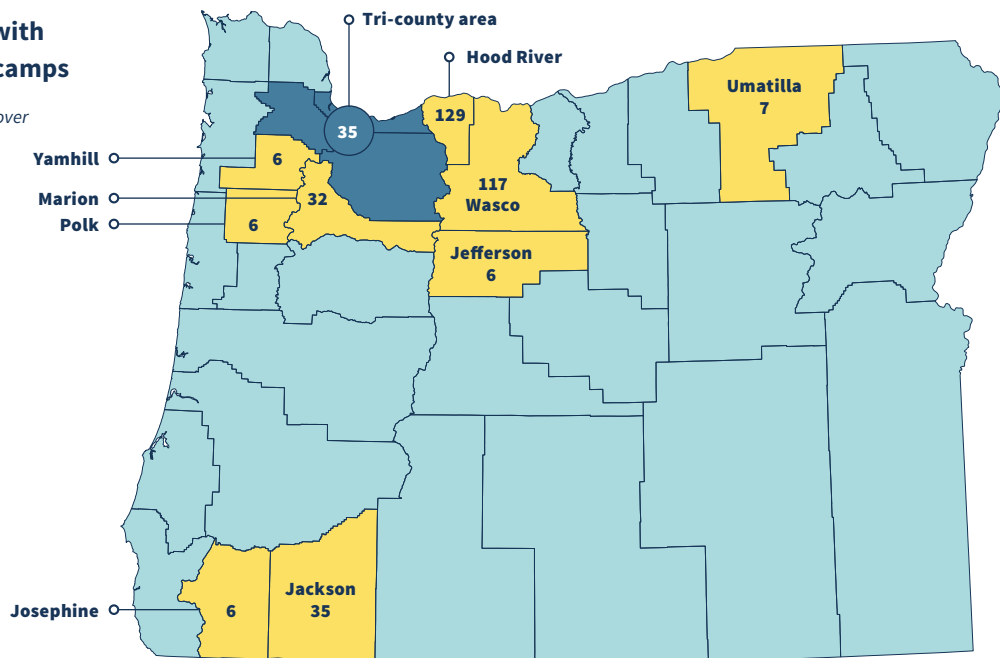
Although it is impossible to provide an accurate count of MSFWs in Oregon with current data, the sheer number of licensed farm labor contractors and farm labor camps and their capacities and locations in Oregon provide some eye-opening figures.

As of 2019, the Oregon Bureau of Labor and Industries, which is responsible for licensing farm and forest labor contractors (FLCs), listed 480 active FLC licenses. Of these, 387 are licensed to employ at least 20 workers each, and several employ hundreds. By even a conservative estimate of 20 workers per FLC, these contractors are eligible to employ a minimum of 8,600 individuals in field and forestry work. Although licensed to contract anywhere in the state, at least 256 of these 387 contractors are located in the Mid-Willamette Valley, followed by 66 in Southern Oregon, and 37 in Northeast Oregon. Fewer than 30 FLCs list primary offices in Washington, Clackamas and Multnomah counties.

In 2019, there were at least **397 registered farm labor camps** in Oregon, with 91% located outside the Portland Metro tri-county area. Collectively, the camps located outside the tri-county area have the capacity to house over **11,000 people**.

Map 3. Rural counties with registered farmworker camps

Note: Map only shows counties with over five registered farm labor camps.





Migrant, LEP, and Latino Students

The majority of immigrant children, or children with at least one foreign-born parent, are Latino. Many are from migrant families that have limited English proficiency (LEP). Although Oregon public school statistics do not break down immigrant student enrollment within the Latino population, the latest statistics indicate that Latino student enrollment is growing. In the 2018-2019 school year, 38% of children enrolled in Oregon's public K-12 schools were non-white, and 23% of those were Latino.

In 2015-2016, the latest year for which figures are available, 576,407 children in Oregon were enrolled in grades K-12. Latino and migrant students are over-represented in the number of children eligible for services under Title 1 Part A (migrant and special education services for children under 21 entitled to a free public education, not yet at grade level). Thirty-seven percent of all children, or 215,605, were eligible for these services. Of these, 11% received migrant education services, including 1,650 identified as migrant students with disabilities. Another 17% were LEP, of which 30% were Latino, 56% white, and the remaining 14% were of other races.

More than one-third of the approximately 19,500 migrant education students received "priority services" in 2018-2109, meaning that they were failing or most at risk of failing to meet the State's academic content. 170 migrant students dropped out during this period—the vast majority during their last two years of high school. Nearly 50% of all migrant education students received support services during this period, which include, but are not limited to: health, nutrition, counseling, social services, necessary educational supplies, and transportation. One-time acts of providing instructional or informational packets to a child or family does not constitute a "support service."

Many FLCs, as well as agricultural producers, also provide housing in labor camps for their workers, which by law must be registered with Oregon's Bureau of Labor and Industry. In 2019, there were 377 registered camps in Oregon, with 94% located outside the Portland Metro tri-county area. Collectively, the 356 camps located outside the tri-county area have the capacity to house over 11,000 people. Although all are not at capacity at the same time or year round, they still house a large number of MSFWs and their families in rural Oregon counties.

Sixty-five percent of the state's farm labor camps are located in the Columbia River Gorge, and just two counties—Hood River and Wasco—have 245 camps with a total housing capacity for 7,191 MSFWs. Southern Oregon counties have a total of 43 camps with a housing capacity of at least 1,425. The Mid-Willamette Valley has a total of at least 53 camps with capacity for 1,189. Northeastern Oregon has at least 15 camps, with a capacity for at least 291 persons. These camps do not include other types of housing where a significant number of MSFWs live, such as large apartment complexes close to where workers commute out to local fields; they also do not include unregistered camps, such as those often found in isolated areas, especially in remote forestry work locations.

Access to Immigration Legal Services Brings Stability, Prosperity and Opportunity to Oregon's Immigrants and their Communities

Changed Lives, Intact Families, Stronger Communities

Immigration legal services provide access to justice and lead to economic and physical security, allowing individuals, families, and their communities to thrive. Many undocumented immigrants and their family members are eligible for some type of legal status, providing individuals and their families with benefits most Americans take for granted: access to education, health care, bank and retirement accounts, drivers' licenses, and freedom to move throughout the community without fear.

Proactive legal services are the **most cost-effective least traumatic way** to provide a path to stability.

Proactive, or affirmative, legal services entail legal representation to help individuals navigate the process of applying for immigration status for themselves or their family members, and applying for visas for crime, trafficking and domestic violence victims before individuals are put into immigration proceedings. Proactive legal services are the most cost-effective least traumatic way to provide a path to economic, social, and educational stability for immigrants, their families, and their communities. Such services help people *stay out of immigration court* and prevent the trauma and tremendous expense of deportation proceedings, which include the costs of legal services and associated impacts on health outcomes, housing instability, food insecurity, and educational attainment. Rural immigrants are especially in peril of arrest and being placed in removal proceedings, where a single broken taillight can result in catastrophic consequences.

Most importantly, proactive legal services that allow individuals to affirmatively acquire legal status provide stability, prosperity, and greater security for *all* Oregonians by reducing fear, exploitation, and poverty rates; and increasing income, tax bases, levels of education, and civic engagement.

Legal Status Dramatically Reduces the Risk of Exploitation and Fear

Countless national studies continue to demonstrate that those who do not have legal status suffer exploitation at rates much higher than those with some type of documentation, and exponentially higher rates than U.S. born individuals. Wage theft, human labor and sex trafficking, uninhabitable housing, inhumane working conditions, denial of workers' compensation and access to health care, and other egregious acts are committed against undocumented immigrants who feel they are trapped without recourse.

Added to rampant exploitation is fear. Immigrants frequently refuse to access health care, education, housing, police protection, and other services to which they are entitled out of fear of being reported to ICE, or fear that accessing such services will have a negative impact on an immigration application. The Trump administration has fueled this fear by making good on its threats to incarcerate and separate families; virtually halt applications for asylum, family reunification, and status for DACA recipients; deny medical and other public benefits to immigrants; creating roadblocks to family visa applications; and making it almost impossible for victims of crime, domestic violence, and trafficking to apply for visas they are entitled to under law.

This fear inhibits immigrants from participating in their communities and accessing the services, protections, and amenities of community life to which they contribute and are entitled. In addition to causing human anguish, this fear and exploitation breaks down all Oregon communities. Criminals and non-compliant employers and housing providers are allowed to profit unjustly from nonpayment of wages and abhorrent living and working conditions. Community members are deprived of residents who bring vibrancy and full participation to their shops, organizations, educational, and civic life; and criminals go free because crime and trafficking victims are reluctant to report to law enforcement.

Legal Status and Naturalization Bring Financial Stability and Prosperity

“Because the labor market experiences of immigrants are powerfully influenced by their legal status, our research affirms the importance of legislation that would provide them with a pathway to citizenship or some form of legal status.”

—*Understanding the Immigrant Experience in Oregon, Research, Analysis and Recommendations from University of Oregon Scholars, 2008. Edited by Robert Busse.*

In addition to enjoying a life with reduced fear and exploitation, immigrants who are able to obtain legal status and move on to citizenship enjoy greater financial stability and are able to lift their families out of poverty. Right now in Oregon, 58% of children of immigrant parents live in low-income households, versus only 39% of children of U.S. born parents, and 67% of Latino children live in poverty—an amount higher than children in U.S. born Black and Native American families. Multnomah and Washington Counties have the highest percentages of homeless students, followed closely by four rural counties: Lane, Jackson, Marion, and Linn.

In Oregon, 74% of naturalized citizens live at or above 200% of the federal poverty income guidelines, while only 56% of noncitizens do. (The term “non-citizens refers to immigrants with some type of legal status as well as those who are undocumented).

Although foreign-born Oregon residents earn substantially less than those born in the United States, most recent census data indicates that median earnings for naturalized citizens over the age of 16 are much higher than that for noncitizens (Figure 1).

Likewise, annual median household incomes of naturalized citizens are nearly \$15,000 more than those of noncitizens (Figure 2).

One DACA recipient reported narrowly escaping an ICE raid as an undocumented teenager several years ago and now, thanks to DACA, is gainfully employed and is a community activist helping bridge gaps between the government, social services, and the immigrant community.

Figure 1. Median earnings in the U.S.

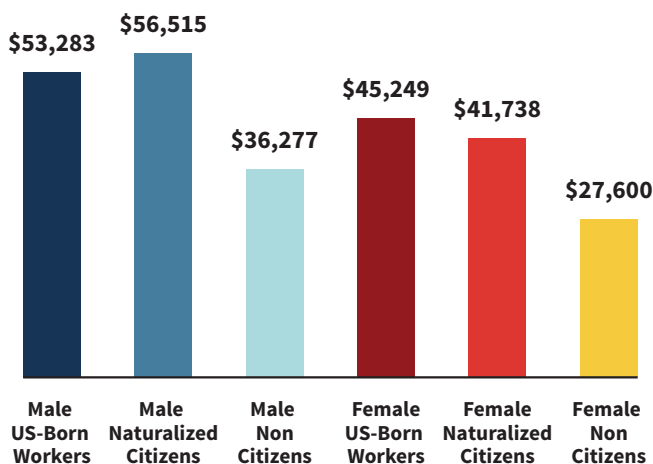
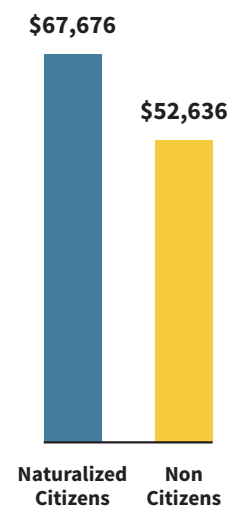


Figure 2. Median household income of naturalized citizens vs. noncitizens



The Impact of DACA

Recent studies “support the view that even temporary authorization programs, such as the expansion of DACA and DAPA...confer important benefits to participants, their families and, in turn, their communities.” Studies also have concluded that **DACA recipients experience an approximate 38% reduction in poverty rates**, higher incomes for the poorest who qualify, and higher levels of employment.

DACA recipient estimated

Federal tax contributions: **\$20.6 million**;

State tax contributions: **\$15.4 million**;

Purchasing power: **\$222.6 million**



Naturalized Citizens Enjoy Better Access to Health Care Coverage

Many fewer immigrants have access to health insurance than U.S. born individuals, but statistics demonstrate that having legal status with a route to citizenship creates an opportunity for many more Oregon residents to obtain health insurance.

Figure 3. Access to health insurance

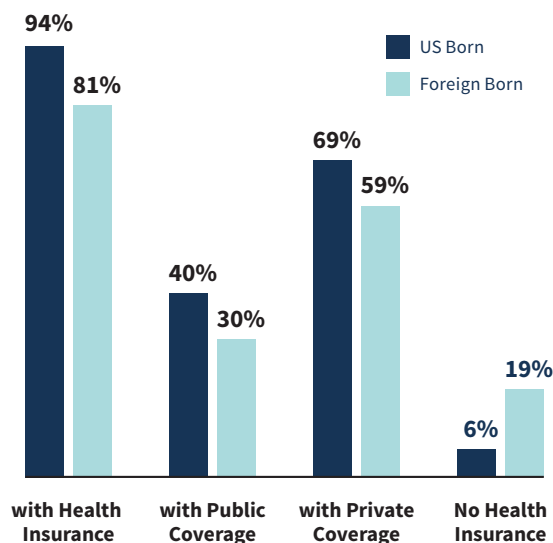
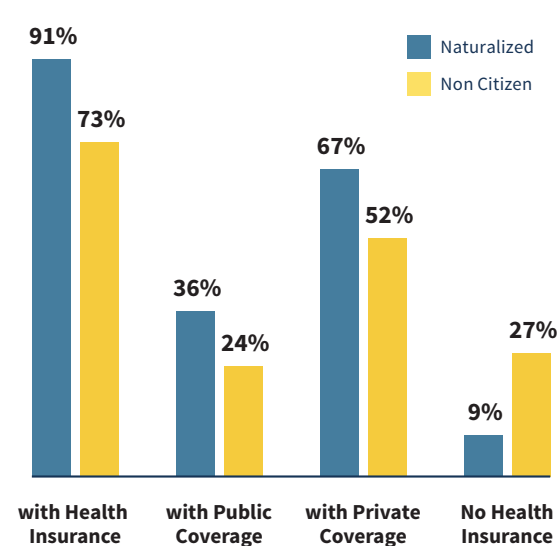


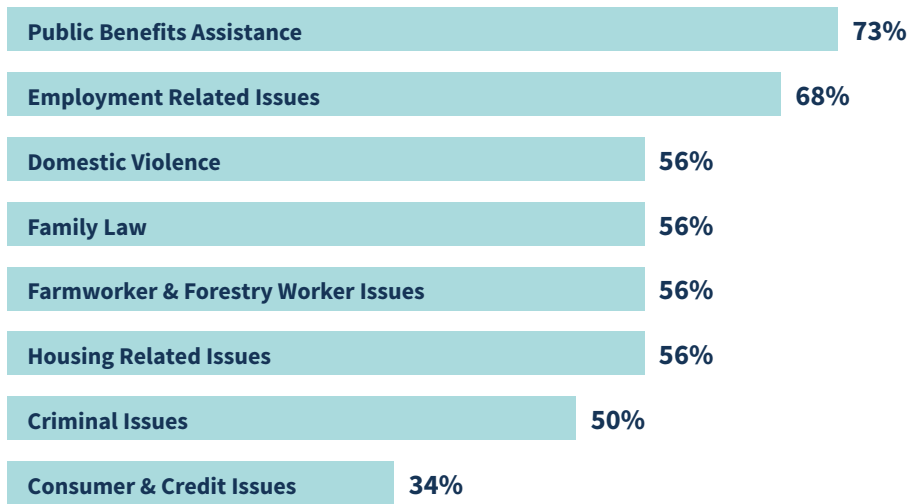
Figure 4. Access to health insurance



Immigrants, Especially Those Without Legal Status or Without the Means to Access Legal Services to Gain a Pathway to Legalization, Suffer a Disproportionate Rate of Harm from Ancillary Legal and Social Needs

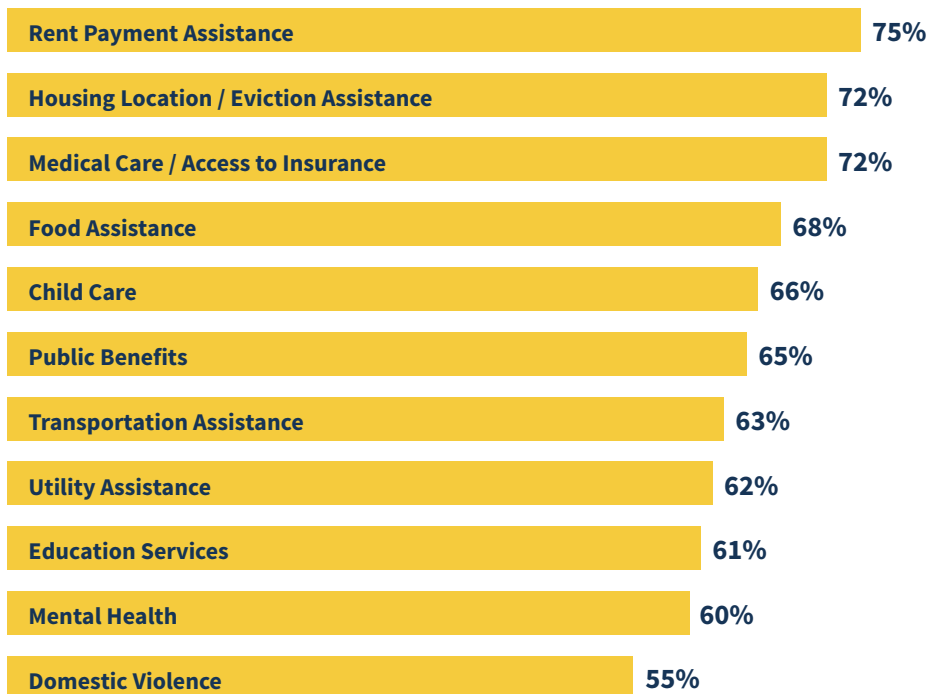
Immigration legal status is tied directly to a host of other legal and social problems suffered disproportionately by Oregon’s low-income immigrants, especially issues exacerbated by poverty and disenfranchisement. In a survey conducted as part of this study, respondents report that immigrants have a high rate of other legal needs that add to their worries:

Figure 5. Respondents reporting most important legal issues



Social (non-legal) services needed by immigrants in 2019 that help provide individuals and households with support, reported as most important or very important by survey respondents:

Figure 6. Respondents reporting most important services needed



Numerous studies demonstrate that immigrants—even those who are low-income—who have some type of legal status that allows them to access jobs, health care, education, and decent housing have fewer ancillary legal and social needs. Naturalized citizens not only earn more but have much higher levels of education: only 21% of naturalized citizens in Oregon have less than a high school diploma versus 41% of noncitizens.

Immigrants Already Make Significant Contributions to Oregon's Economy; Providing a Pathway to Legalization Will Dramatically Increase Those Contributions

Beyond the crippling human cost, the new immigration policies have profound direct adverse impacts on Oregon's economy, especially in rural areas. Immigrants make up a large percentage of the state's civilian workforce, especially in natural resources, manufacturing, and the services industries.

The latest figures available show that immigrant-led households in the state paid \$1.7 *billion* in federal taxes and \$736.6 million in state and local taxes in 2014. As of 2015, there were an estimated 116,000 undocumented immigrants in the state, 65% of whom have resided in the state for more than 10 years. Nearly 15% are married to a U.S. citizen or legal permanent resident, 40% reside with at least one U.S. citizen child under the age of 18, and 30% are homeowners. In Oregon alone, undocumented workers' estimated current contribution to state and local taxes is approximately \$80,775,000. If these immigrants were granted legal status, their tax contributions would increase by 68%, bringing in almost \$39M additional funds to the state's coffers.

Increased wages and contributions to community tax bases, especially in Oregon's rural communities, lead to stronger support for schools, which support an educated populace, which in turn supports business and civic life.

In Oregon alone, undocumented workers' estimated current contribution to state and local taxes is approximately **\$80,775,000**. If these immigrants were granted legal status, their tax contributions would **increase by 68%**, bringing in almost **\$39M** additional funds to the state's coffers.

Legal Representation Makes a Dramatic Difference in Ability to Gain Affirmative Legal Status and in Immigration Court Case Outcomes

“If I could raise my voice to people in power I would say that having an advocate to represent you in exercising your right to immigrate, and your right to keep your family together should be considered a fundamental human right; people should have the opportunity to keep their families safe and economies healthy and reduce fear. Everyone should be pushing for immigration reform; not only will it help the economy, it will stop the abuse of immigrants.”

—John Herrera, Legal Director, Catholic Charities Immigration Legal Services

Oregon’s nonprofit legal services providers estimate that at least one-quarter to one-third of clients who come through their doors for a consultation may be eligible for some type of legal status, but because of numerous barriers, these clients often are unable to follow through. For those immigrant clients they do represent in family-based and other affirmative (proactive) legal cases through USCIS, all the nonprofits report that they have almost a 100% success rate.

The USCIS and Homeland Security case statistics and numerous studies bear this anecdotal evidence out, providing stark proof that immigrants with legal representation have a much higher rate of success in completing visa applications and in court proceedings:

ASYLUM

Recent Department of Homeland Security statistics show an alarming downward trend in the proportion of immigrants seeking asylum who are able to obtain legal representation. Legal representation is significant, since these same statistics demonstrate that asylum seekers who are represented by lawyers are five times more likely to gain asylum. For example, as of 2019, an average of 60% of asylum cases are being denied by the Portland immigration court, with individual judges denying between 45% and 75% of cases.

DEPORTATION PROCEEDINGS

Currently, fully one-third of immigrants in Oregon immigration court facing deportation are unrepresented. Recent Department of Homeland Security statistics show that immigrants represented by lawyers are much more successful in obtaining legal status in almost all types of cases. For example, immigrants who had been released from detention and were able to access lawyers had a nearly 50% success rate, compared with detained refugees without representation where only 8% were successful in winning their cases.

Historical immigration court statistics in Oregon bear this out. In cases from January 2002 through May of 2020, of 7,817 individuals for whom the immigration court issued deportation orders, **only 19%** were represented. In contrast, **89% of those granted some type of immigration relief** were represented by lawyers.

Asylum seekers who are represented by lawyers are **five times** more likely to gain asylum.



UNACCOMPANIED CHILDREN UNDER 18 IN DEPORTATION PROCEEDINGS

The number of children under 18 in Portland immigration court has exploded in the last two years. In federal FY 2017, only 346 cases were filed that included unaccompanied minors, and 69% of those children were represented. In FY 2018, the government initiated 1,825 cases against children under 18, and the number represented decreased to 63%. In FY 2019, the government nearly doubled the number of cases brought against children to 3,012, and only 38% of those children were represented by lawyers. Statistics on unaccompanied minors in immigration court reveal that those without lawyers have only a 10% chance of winning their cases, versus nearly 60% for those who are represented.

FAMILIES IN DEPORTATION PROCEEDINGS

Current U.S. immigration law does not require the government to provide timely notice to immigrants of their hearing dates and times, resulting in tragic consequences for immigrants, especially those who are unrepresented. According to a 2019 study that tracked over 46,000 removal hearings flagged as family cases by the court for over 60,000 parents and children seeking asylum, **fully 99.9% of families showed up to their hearings when represented by lawyers.**

CUTOFF OF REFUGEES RESETTLED IN OREGON

Since 1975, approximately 67,743 refugees granted refugee status before arriving in the United States have been resettled in Oregon. People fleeing violence and persecution in their own countries are interviewed by the United Nations High Commissioner for Refugees (UNHCR). If they meet the definition of a refugee under international law, they are allowed to resettle in other countries, including the United States. Between 2013 and 2017, an average of 1,365 refugees per year were resettled in Oregon; that number dropped dramatically in 2018 to only 589. From October 2019 through April 2020, that number was only 156. In federal FY 2017, the most common refugee groups resettling in Oregon were from Ukraine, Somalia, Cuba, Iraq, and Afghanistan.

The Most Significant Immigration Legal Needs Facing Oregon's Low-Income Rural Immigrants

Over the past 15 years, U.S. immigration policy has grown increasingly harsh and reached its apex under the current Administration, with its draconian rollback of existing policies and implementation of restrictive ones—including the unprecedented attacks on unaccompanied children, families seeking to legally reunify, and asylum seekers.

The stakes for Oregon are particularly high. The majority of Oregon's immigrants live in mixed-status families, meaning that at all times a large percentage lives with the threat and unrelenting fear of their families being torn apart by removal proceedings. Many people lack the resources to secure legal representation to file for family reunification, apply for a visa, or to defend them in an immigration court hearing. Securing a private immigration attorney costs thousands of dollars; and even if immigrants can access nonprofit legal services, the USCIS visa fees are beyond the reach of many.

Immigrant Community and Stakeholder Perspective

Survey respondents were asked to report the importance of the following immigration legal needs they were aware of in their community or that immigrants had reported to them in 2019. Work authorization, deportation proceedings, status of family members, DACA, and ICE all ranked important or very important (Figure 7).

When asked about other most or very important immigration-related legal needs that they are aware of, survey respondents indicated problems related to not having a driver's license, fear of calling the police or going to court, fear of asking for public benefits, problems related to not having a Social Security Number, and fear of someone calling ICE if they complain about poor working or living conditions (Figure 8).

The questions regarding immigration and immigration-related legal needs were designed to track those asked in the 2018 *Oregon Legal Needs Report* for consistency. The responses to these survey questions also support the findings in the 2018 report.



Figure 7. Most important immigration legal needs, according to respondents

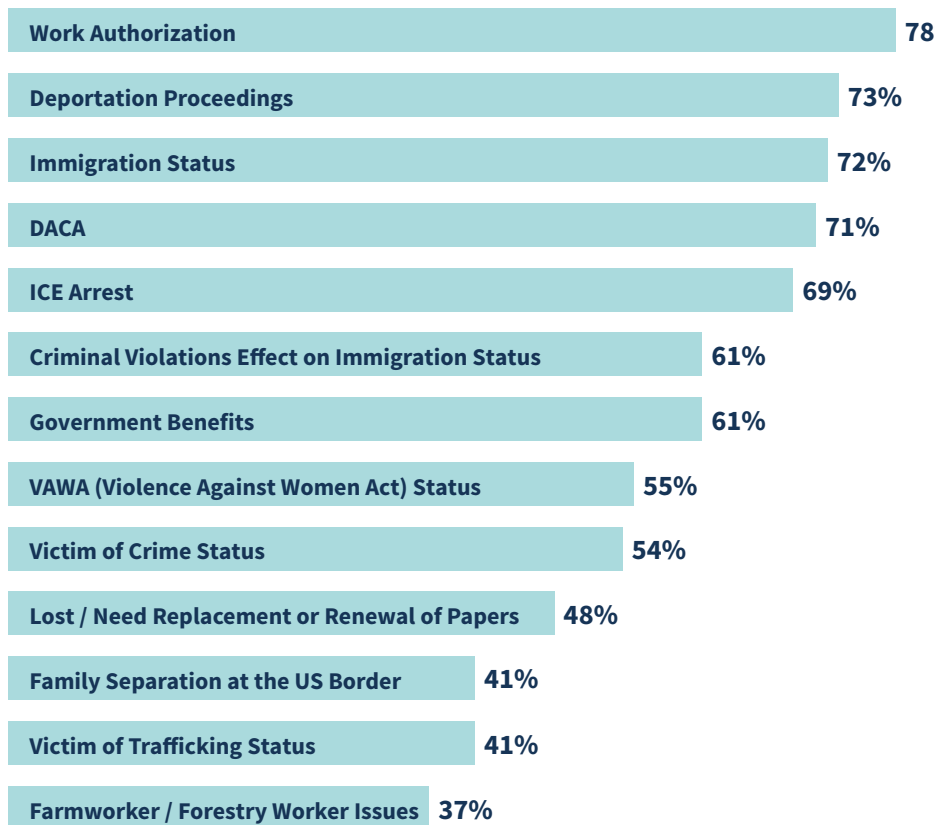
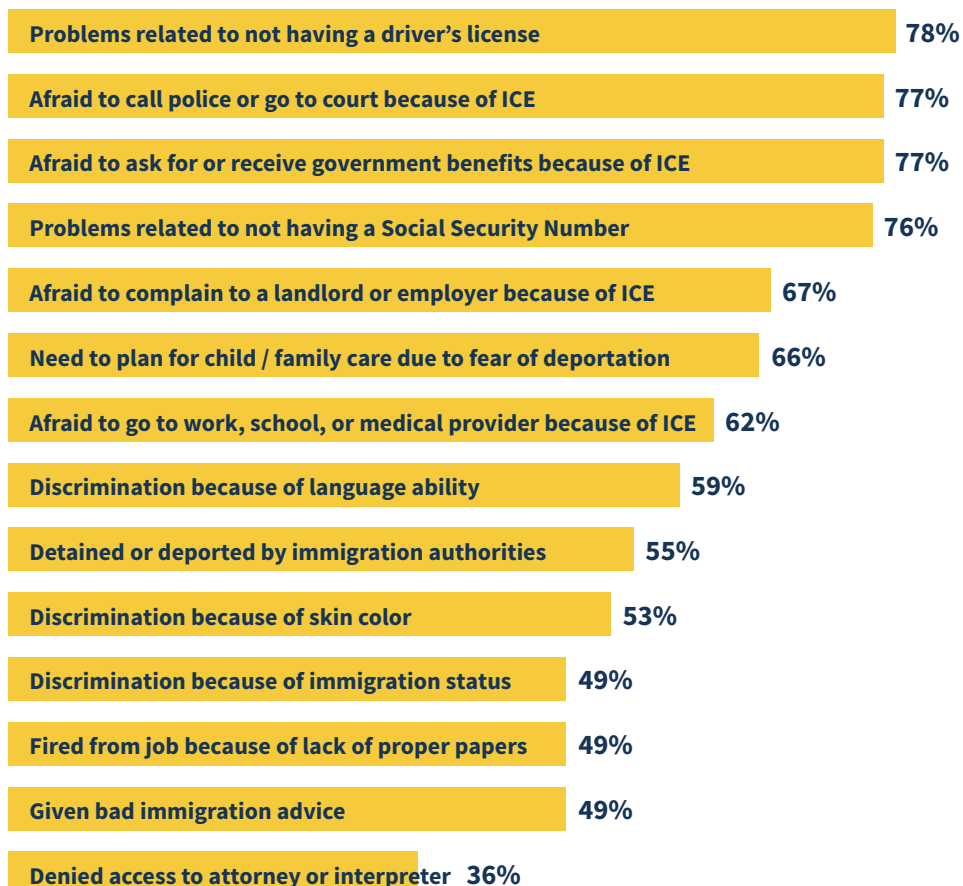


Figure 8. Other important immigration legal needs, according to respondents



Nonprofit Immigration Legal Services Providers Perspective

Several Trump administration policy directives and actions during 2019 and into 2020 continue to have unprecedented negative impacts not only on immigrants, but on immigration lawyers trying to help them—especially nonprofit immigration legal services providers—unlike in any other area of law. Taken together, these policies and actions have exponentially driven up the workload and corresponding costs of representing clients, while reducing or eliminating the nonprofits’ ability to conduct meaningful outreach into communities because all personnel are now focused on responding to these unprecedented policies. The most serious of these ongoing negative impacts include:

“Constantly changing law and policies make this work super challenging.”

—Caroline Van der Harten, Legal Director,
SOAR Immigration Legal Services

LAW AND POLICY IS SHIFTING ON A DAILY BASIS

Since early 2017, immigration advocates have faced an almost daily onslaught of new regulations, policies, and practices—from the rescission of DACA to the implementation of new public charge rules. Additionally, most of these newly implemented policies are being challenged in federal courts across the country, resulting in a patchwork of court decisions that wind their way through appeals courts, casting further confusion on the status of the law. These changes have permeated nearly every aspect of an immigrant advocate’s work. For example, until the Trump administration, the government had a uniform policy on Cubans entering the country: they could apply for parole and receive a limited status. SOAR, which has dealt with a number of these cases, reports that these uniform policies are no longer in place. Nearly every client is treated differently, and almost all are receiving Notices to Appear (NTAS). In addition to the tremendous amount of extra resources that must be devoted to each of these cases, this policy change has created tremendous anxiety in Oregon’s Cuban community, and has left advocates unsure of which legal routes the government will pursue.

“USCIS has become an Enforcement Agency”

—Isaac Alley, Managing Attorney, ICS

ADMINISTRATION-CREATED ROADBLOCKS STYMIE THE ADMINISTRATIVE PROCESS

The U.S. Customs and Immigration Services (USCIS) is the government administrative agency that processes visa applications. Until 2017, most administrative processes, while not overly immigrant-friendly or simple, were at least fairly straightforward and uniformly applied. Since then, however, the Administration has thrown up numerous roadblocks intended to slow down, or halt, even the simplest of processes. For example:

→ **Requests for Evidence (RFE) in the Most Simple, Straightforward Cases.** USCIS has been sending out RFEs on a regular basis, so much so that one advocate described it as being “a philosophy of denial” that makes it much more difficult to successfully apply for any kind of immigration status. USCIS has dramatically increased the number of RFEs and now uses them in almost every case, including simple requests for work permits. This tactic results in substantial delay and increased cost, since each RFE must have a carefully drafted response, and requires both attorney and client to engage in often-extensive gathering of additional information.

→ **Blanket Denials in Family Based, Asylum and Crime Victim Cases.** In the past, USCIS rarely denied cases and referred them to immigration court only in extreme cases. Until two years ago, most of these cases were approved. However, all of the large nonprofit immigration legal services providers report that USCIS has quickly evolved into an enforcement agency, now referring cases with small scrivener’s errors to immigration court. In many cases—including family-based petitions, U visas (for crime victims) and asylum cases—if an attorney leaves a blank space in an application form for an answer to a question that does not apply to the client, versus putting an “N/A” for not applicable, the application will be automatically rejected. This has become a huge barrier for clients, as denied applications can have serious consequences.

NO MORE PROSECUTORIAL DISCRETION

Historically, the judges and Chief Counsel’s Office of the Executive Office for Immigration Review (immigration courts) in Portland were very collegial. But in the past two years, the situation has completely changed. Nonprofit attorneys report that the Chief Counsel’s Office lawyers are still professionally cordial, but they have ceased exercising prosecutorial discretion.

“The Remain in Mexico program (requiring asylum seekers to wait in Mexico while their applications for asylum are processed) has become a real problem. The families are waiting many months in refugee camps and are sitting ducks for predators. The tent courts set up by the Trump administration lack even the pretense of due process, denying immigration attorneys access to these courts. The stories we are hearing are absolutely atrocious. It is a crime against humanity.”

—Isaac Alley, Managing Attorney, ICS

VIOLATION OF U.S. LAW, HUMAN RIGHTS, AND LACK OF MINIMAL DUE PROCESS IN ASYLUM CASES

In the last few months since COVID-19 restrictions have been implemented, the asylum process has been shut down completely at the U.S. Mexico border, and immigrants seeking protection from violence and death are returned to the places they are fleeing, in violation of international law and due process. The U.S. government is now “flying kids right back without a credible fear interview. Even more troublesome, when they land back in El Salvador, many are attacked and/or killed because people think they are carrying the plague. These children are not even given a credible fear hearing before being put on a plane,” says Isaac Alley, ICS Managing Attorney.

“It’s completely different now, the success rate for asylum isn’t very good after Matter of AB and Matter of LEA. Also, I have four affirmative asylum cases that have been waiting for a decision for over a year. All are from the Middle East. Three of them are single moms with children and one LGBTQ client...and it’s becoming a lot harder...”

—Alma Jean, Lutheran Community Services NW

INCREASED NUMBERS OF IMMIGRANTS SEEKING ASYLUM BUT DECREASING SUCCESS RATES

All nonprofit immigration legal services providers report experiencing increased clientele from Central America—mostly women and children from Guatemala and El Salvador fleeing violence, who are still making their way to the U.S. border despite the Administration’s harsh policies, simply because they have nowhere else to go. At the same time, they report that asylum cases they are able to bring are almost uniformly being held up, with case delays increasing from months to years, leaving vulnerable and traumatized clients to exist in limbo, without resources.

NEW “PUBLIC CHARGE” RULE

Congress established a rule in 1982 allowing immigration officials to deny visas to immigrants “likely” at any time to become a public charge. However, the term “public charge” was never defined, and the rule was interpreted fairly narrowly to mean that an individual was likely to become “primarily” dependent upon the government for subsistence. In February 2020, however, a new Administration rule took effect that greatly expands the ambit of “public charge” to anyone it deems may be “more likely than not” to depend on government benefits and applies to persons applying for green cards, adjustment of status, and other visas from within the United States as well as those going through consular processing outside the U.S.

This rule change has serious implications for immigrant and their advocates. Where prior to the rule’s implementation a one-step family member petition may have been straightforward, now these I-130s (petitions for relatives) have to be very carefully analyzed. It makes the process much harder for many of the nonprofits to accept cases since they need to spend a great deal of precious resources gathering information to determine whether or not it’s too risky for a client to apply.

CRIME, TRAFFICKING, AND DOMESTIC VIOLENCE VICTIM VISAS (T, U, VAWA) REJECTION RATES INCREASE

Nonprofits report experiencing a surge in asylum-seekers, U (crime victim), T (trafficking victim) and VAWA (Violence Against Women Act) cases—especially for new arrivals—while simultaneously experiencing troubling trends in these cases being more frequently denied. All report an increase in the number of U visa clients whose applications have been rejected and referred directly to immigration court, especially those coming from the Vermont Service Center. Prior to 2017, they report the government did not deny these cases and refer them to immigration court unless there were serious criminal issues.

INCREASED AND AGGRESSIVE ICE ENFORCEMENT AND DEPORTATION IN RURAL OREGON

Deportation proceedings are time-consuming, complex, and very expensive. Even formerly “simple” defensive asylum cases (those brought in immigration court versus raised affirmatively with USCIS) have become overwhelmingly complex. It is not at all unusual for immigrants placed in deportation proceedings to pay a private lawyer well over \$20,000 for deportation defense services. The dramatic rise of enforcement means an increasing number of low-income Oregon immigrants are less likely to be able to afford legal services, and fewer nonprofit legal services providers have the resources to defend them.

Ice Arrests. Residents of rural counties in Oregon are disproportionately adversely affected by ICE arrests. In a three-and-a-half-year period between October 2014 through May 2018, ICE arrested a total of 4,027 Oregon residents—nearly 1,000 persons a year. During that period, 50% of the arrests took place in Multnomah County. However, nearly 40% of the total number of ICE arrests took place in just six rural Oregon counties: Marion had the second highest number of arrests in the state after Multnomah, followed by Lane, Yamhill, Jackson, Wasco, and Umatilla. The other urban counties—Washington and Clackamas—were well behind these rural counties, with arrests in both totaling just one-tenth of one percent of the state’s total ICE arrests.

Just **three** rural communities east of the Cascades—Pendleton, Hermiston and Boardman—account for nearly **10%** of *all* Oregon deportation cases.

Nearly **40%** of the total number of ICE arrests took place in just **six** rural Oregon counties.

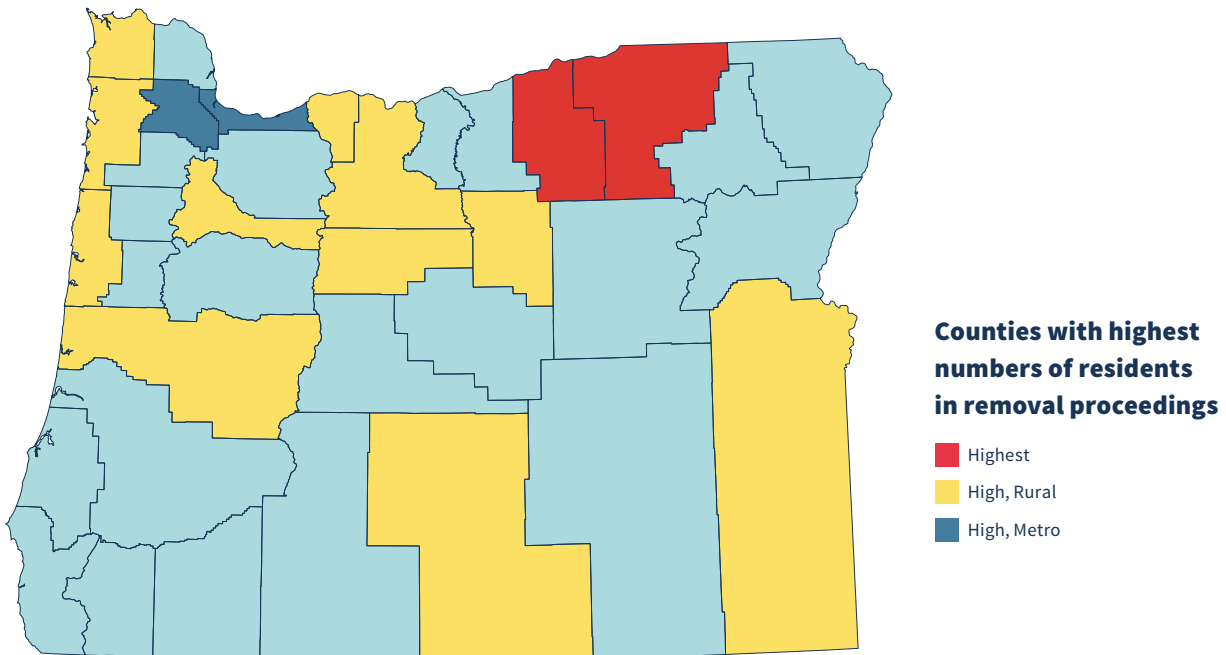
Rates Of Deportation. Deportation orders on immigration charges in Oregon have increased dramatically in the past two years. In the Federal FY 2016, DHS records show 432 individuals were ordered deported. In FY 2019 that number had jumped to 1,154, an increase of nearly 300%, and those numbers are expected to surge again by at least another 9% in FY 2020. Correspondingly, immigration court orders granting some type of immigration relief have declined dramatically. In FY 2016, 797 people in Oregon were granted some type of relief, termination of deportation proceedings or closure. That number fell to just 452 in 2019 and is expected to further decrease by at least one-third to just 279 in 2020.

→ **Rural Areas Have Higher Deportation Rates:** Recent data shows that when adjusted for population, rural communities throughout the United States, including in Oregon, have higher rates of residents in removal proceedings than residents in urban areas, and these residents often find themselves less able to access legal assistance. Umatilla and Morrow Counties have the highest number of residents in pending removal proceedings in Oregon. Eleven other rural counties (Clatsop, Tillamook, Lincoln, Lane, Marion, Hood River, Wasco, Jefferson Wheeler, Lake and Malheur) all tied with Washington and Multnomah Counties.

→ **Immigrants in Just a Few Rural Counties Suffer the Most:** The latest DHS figures from February 2019 indicate that Oregon had over 5,100 pending deportation cases in immigration court as of that time. Only 52% of those cases were from the Portland metro tri-county area. The other 48% were in rural counties. Disturbingly, just three rural communities east of the Cascades—Pendleton, Hermiston and Boardman—account for nearly 10% of *all* Oregon deportation cases. This is more than all of the cases in Marion County, and well over half of the number in Portland. Just two more towns, Bend and Redmond, add up to another 93 cases.

→ **More Immigrants Ordered Deported to Countries with High Rates of Persecution and Violence:** Over 61% of immigrants ordered deported are from countries experiencing extreme violence. As of March 2020, Oregon had a total of 855 individuals ordered deported on immigration charges alone. The top countries were Guatemala (417), Mexico (279), Honduras (65), and El Salvador (43). Another 179 immigrants from other countries had been granted a “stay” (relief, proceedings were terminated, or the case was closed).

Map 4. Those who put food on Oregonian's tables are the most targeted



Immigrants Determined Inadmissible. In the Department of Homeland Security Portland Field Office, the number of immigrants deemed inadmissible increased by 33% between 2016 and 2018: from 1,548 to 4,754.

Increasing Immigration Court Backlogs and Caseloads. Due to the government's aggressive filing of deportation cases since the Trump administration took office, the wait times for hearings, and judges' caseloads, have grown dramatically. In federal FY 2017, the backlog grew by 16%, in FY 2018 it grew by an additional 22%, and in FY 2019 it increased by an additional 33%. Average wait times in some jurisdictions are as high as four years. As of 2019, government data shows that the active immigration case backlog grew to over 1 million cases, with an estimated average caseload of over 2,000 cases per immigration judge.

In Oregon, immigration court judicial caseloads and average wait times reflect the national average. As of 2019, there were 6,815 pending active cases, with a projected average wait time of 1,015 days, or nearly 3 years, per case. DHS issued 37% more Notices to Appear (NTA) in 2018 than in 2017, with increases across all DHS Components.

OTHER IMMIGRATION-RELATED LEGAL ISSUES

Human Trafficking. A 2018 Report of the Oregon Advisory Committee to the U.S. Commission on Civil Rights on Human Trafficking in February indicates that Oregon immigrants, especially those in more remote rural areas, remain in great danger of human sex and labor trafficking. Highlights of the report's findings include:

- Human trafficking is largely present in the sex and entertainment industry, which is legalized in Oregon, and in industries where foreign-born workers tend to find work: agriculture, construction, sweat shops, restaurants, and domestic work.
- Foreign-born communities of individuals from Mexico, Central America, and Southeast Asia, and especially those with limited-English proficiency, are disproportionately affected by human trafficking.
- A large number of labor trafficking victims are male, non-English speaking Indigenous/Mesoamerican immigrants from Mexico and Central America, who suffer myriad ancillary legal problems including: wage theft, intimidation, poor working and living conditions, health and safety violations, and discrimination.
- The H2A program is "characterized by rampant exploitation of foreign-born workers."



“A common issue that is encountered is the refusal of AG employers using the H2A program to hire domestic MSFWs. The (Advocate) spends a high percentage of his time mediating with AG employers on educating AG employers on the legal protections of MSFWs and their rights to H2A jobs. During the (program year 2017-2018) Oregon had 114 H2A job orders, approx. 1000 plus workers. Appropriate referrals (of domestic MSFWs) to H2A job orders continues to be an issue...”

—Oregon Farmworker Advocate Office 2017-2018
FY Year Report to U.S. Department of Labor

The H2A and H2B Visa (“Guest Worker”) Programs Have Numerous Negative Implications for Immigrant Workers. The H2A and H2B visa programs provide agricultural and forestry producers, as well as non-agricultural employers such as hospitality and construction, with a method for hiring seasonal foreign workers on temporary visas. Such employers must prove to the U.S. Department of Labor that there are insufficient numbers of U.S. authorized workers to fill such jobs and they will provide minimum levels of health, safety and wage conditions.

Oregon’s growers and forestry employers increasingly turn to the H2A temporary visa program to meet seasonal needs. As of June 1, 2020, agricultural and forestry employers posted 93 H2A job orders for a total of over 2,100 workers and at least 1,300 of those workers, or 62%, would be placed in the following five areas: Southern OR (356), NE (154), Gorge (345), Central Valley (426), Central OR (19). These numbers are up substantially from the year before.

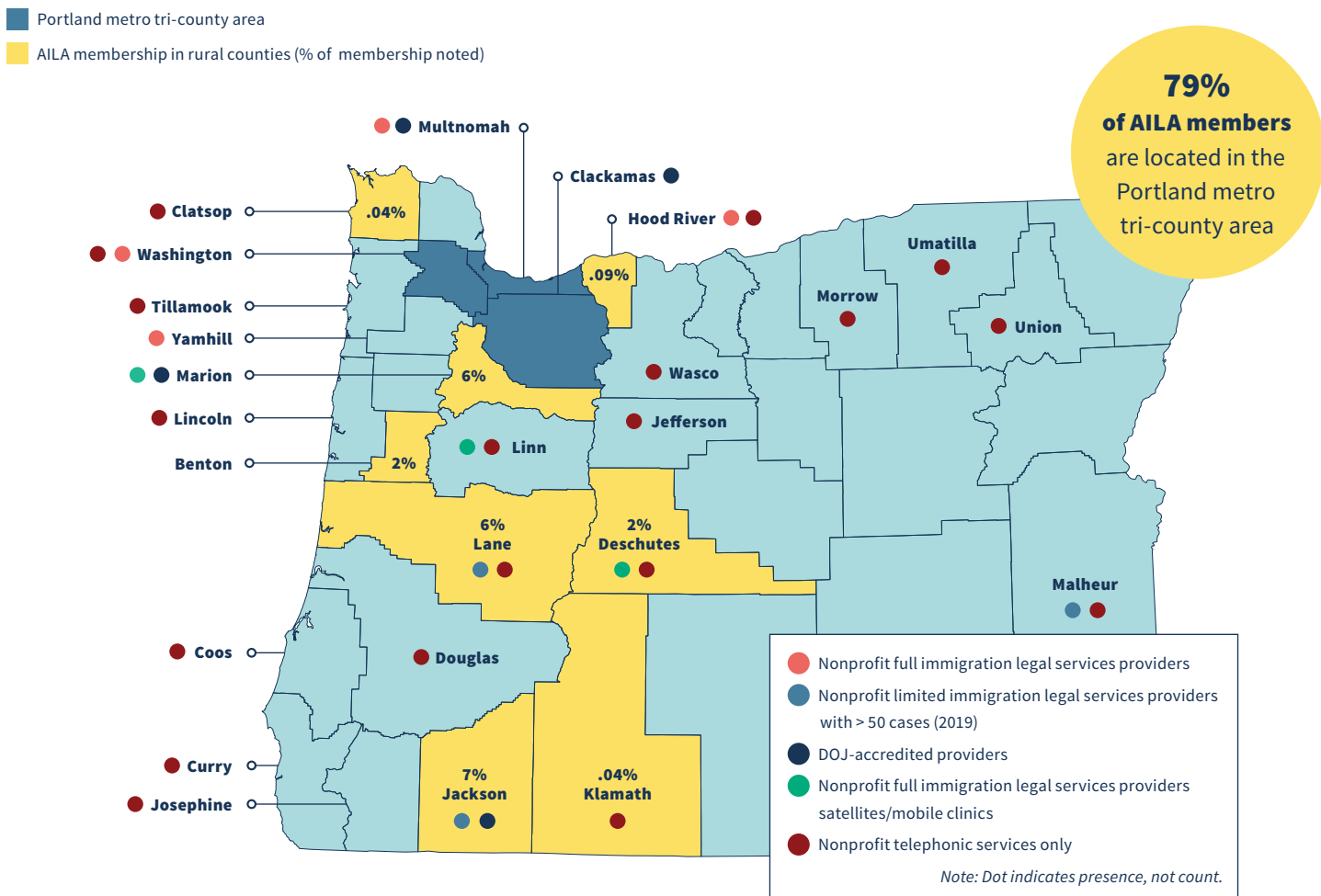
Unfortunately, this program has suffered from serious lack of oversight and led to numerous abuses. Not only does this have a direct impact on the guest workers themselves—who often are left with no legal recourse to address abuses such as wage theft, human trafficking, and deplorable working conditions—but it has serious implications for domestic immigrant workers as well, the most important being that many employers ignore their obligation to first offer these jobs to documented immigrant workers, rather than temporary foreign workers who are much more easily exploitable.

Snapshot of Existing Configuration of Legal Services for Immigrants

Despite these incredible legal needs, large swaths of rural Oregon with substantial immigrant populations remain “legal deserts”, i.e., areas where there is little to no access to affordable legal services. Although private lawyers and full-service nonprofit immigration legal services located in the Portland metro tri-county area (and other urban centers) can, and often do, provide services outside their geographic locations, clients living in more remote areas, or far from urban centers, do not make up a large percentage of their caseloads.

This has serious implications not only for individual immigrants, but for communities and state policy makers as well. Without access to culturally-competent advocates who can navigate the byzantine U.S. immigration laws on behalf of clients who are eligible for relief, and who can provide advice and resources for keeping undocumented individuals and family members safe, immigrants in rural areas are completely without the protection to which they are entitled under immigration laws and the federal and state constitutions. Likewise, a dearth of culturally competent immigration advocates intimately familiar with the rural communities in which they work and live who can effectively advocate for their community members means that policy makers will continue operating in the dark with regard to critical substantive legal issues that impact rural Oregonians.

Map 5. Immigration Legal Services Providers in Oregon



Oregon's Private Immigration Legal Services Attorneys

Most practicing immigration lawyers in Oregon, though not all, are members of the Oregon Chapter of the American Immigration Lawyers Association (AILA). AILA membership has increased over the years and many members provide countless hours of free immigration legal services, as well as conducting critical community education and outreach.

Most of these AILA members belong to the Oregon AILA email list serve. As of April 2020, that list serve includes 279 total members, 212 of whom have offices located in Oregon. **Of those, 79% are listed as having offices only in the Portland metro tri-county area (Multnomah, Clackamas and Washington Counties) and only 46 Oregon AILA members are listed as having offices located outside those three counties—this means that only eight out of Oregon's 33 rural counties had registered AILA members in 2019** (Map 4).

Many rural counties do not have a single AILA member listed, including Umatilla and Morrow Counties, which have some of the highest rates of deportation. Although some rural residents in those Northeastern Oregon counties may be able to access immigration legal services in the Tri-Cities area of Washington, that journey across the Columbia River is at least 40 minutes one-way for residents of Umatilla and Hermiston, and over an hour one-way for Pendleton residents.

Between October 2018 and March 2020, Oregon immigration nonprofits provided over **760 Oregon immigrants** with legal assistance in deportation cases.

Nonprofit Immigration Legal Services Providers

Nonprofit immigration legal services organizations are vital to ensuring access to justice for low-income immigrants in Oregon. In 2019, all of the state's immigration legal nonprofits provided direct legal services to over **11,000 low-income immigrants throughout the state** on a wide range of proactive and deportation defense matters.*

NONPROFITS EXCLUSIVELY DEVOTED TO PROVIDING A WIDE RANGE OF PROACTIVE AND DEFENSIVE IMMIGRATION LEGAL SERVICES

Oregon has four "full service" nonprofit law firms that are exclusively dedicated to providing a wide range* of direct, low-cost proactive (affirmative) and defensive immigration legal services to low-income immigrants: Immigration Counseling Service (ICS); Catholic Charities Immigration Legal Services; Lutheran Family Services NW (LFSNW), and Ecumenical Ministries Sponsors Organized to Assist Refugees (SOAR). All of them are headquartered in the Portland tri-county metropolitan area and serve mostly immigrant populations in those three counties. Only one, ICS, is "free standing," e.g., not part of a larger multi-service nonprofit engaged in other types of social services work.

The four "full service" legal nonprofits serve individuals with household incomes at or below 200% of the federal poverty income guidelines (which for Oregon in 2020 are \$25,520 for a household of one and \$52,400 for a family of four). They charge \$50 for a legal consultation (vs. the average Portland-area private attorney rate of \$150-\$250) and offer sliding fee scale charges that are substantially less than what private firms in the tri-county area charge.

**This number does not count additional free or low-cost services provided by private immigration lawyers, nor lawsuits challenging the Trump Administration's immigration policies brought in federal court on behalf of individual immigrants.*

**The phrase "wide range" excludes student visas, temporary work and business visas, and certain other types of visas, such as for entertainers, etc.*

CATHOLIC CHARITIES IMMIGRATION LEGAL SERVICES

The vast majority of Catholic Charities cases are family-based involving relatives petitioning for family in other countries to join them. They also handle a large number of permanent residency, work permit and naturalization cases, and other cases such as asylum, and crime, trafficking and domestic violence visa (U, T and VAWA) cases. The majority of clients they represent are Spanish-speaking and come from Central America or Mexico, but the office also represents individuals from a wide range of countries around the world. The majority of clients they represent are Spanish-speaking and come from Central America or Mexico, but the office also represents individuals from a wide range of countries around the world. Although the majority of their clients are concentrated in the Portland metro tri-county area, approximately 20% of their clients reside in other rural areas of the state.

Rural Component

Catholic Charities rural immigration legal services program provides connections in nine counties for residents to make phone appointments with lawyers in the Portland office and focuses primarily on U visas, VAWA, and Employment Authorization initial application and/or renewals. This telephonic program covers: Clatsop, Coos, Crook, Curry, *Deschutes, Douglas, Hood River, Jefferson, Josephine, Klamath, *Lane, Lincoln, Linn, Malheur, Morrow, Tillamook, Umatilla, Union, Wasco, *Washington. Catholic Charities also has a .8FTE attorney in Eugene focused on providing deportation defense services under an Equity Corps contract, beginning in March 2020.

**Not a fully rural county, but these services were within the rural zip code.*

IMMIGRATION COUNSELING SERVICE (ICS)

ICS has two primary program units: one that provides a wide range of proactive and defensive immigration legal services, and another that provides services exclusively to unaccompanied children (UC Program). Through a grant from the Vera Institute of Justice, ICS has long been Oregon's only provider of legal services to unaccompanied immigrant children under the age of 18 detained in Oregon. Outside of its UC program, like the other nonprofit legal services providers, the majority of cases ICS handles are family-based petitions, work permits, permanent residency, and naturalization petitions. ICS also represents immigrants on a wide variety of other cases, including asylum, U visas, T visas, and VAWA. The majority of ICS's clients are Spanish-speaking and come from Mexico and Central America (as do the majority of their asylum-seeking and UC clients), but they also serve clients from numerous other countries.

Rural Component

Nearly one-third of ICS's clients are from outside the Portland metro tri-county area. In addition to its Portland Office, ICS has had a bricks and mortar office in Hood River since 2016, serving clients in adjacent counties along both sides of the Columbia River all the way east to the Idaho border. ICS also has operated a twice monthly mobile immigration legal clinic in Deschutes County in partnership with the Central Oregon Latino Community Association since January 2018, serving approximately 120 clients in Deschutes, Crook and Jefferson Counties per year. In late 2019 ICS launched a monthly mobile immigration legal clinic in Albany in partnership with several nonprofit organizations serving Linn, Benton, and Lincoln Counties. In addition to the cases handled by the legal team at the Hood River office, ICS also provides pro se legal services to immigrants detained in Wasco County's NORCOR immigration detention facility, in collaboration with attorneys from the Oregon ACLU.

In 2019, Oregon's **four** "full-service" immigration legal nonprofits handled **approximately 89%** of all nonprofit immigration legal work in the state, providing assistance in over **10,399 cases**, including consultations and advice. They also reached many thousands more through community education and *Know Your Rights* programs they conducted throughout the state and in collaboration with the Mexican Consulate. The majority (over 50%) of their clients are from Central America or Mexico, and are employed as MSFWs, in service, hospitality, or construction industries. Approximately 30% live outside the Portland metro tri-county area.

LUTHERAN COMMUNITY SERVICES NORTHWEST (LCSNW)

The majority of LCSNW's cases are family-based, but like the other nonprofits, they also handle asylum, work permit, permanent residency, U-visa, and naturalization cases. The majority of clients come from Mexico and Central America, but they also have a large number of Vietnamese and Russian-speaking clients and have staff that are DOJ-accredited representatives from Russia and Vietnam to assist these clients. Most clients they represent in immigration court with asylum claims are from Central America. Between 20-30% of their clients come from outside the Portland metro tri-county area, not including the clients represented through their Vancouver, Washington office.

Rural Component

LCSNW has a brick and mortar office in Yamhill County, staffed by two full-time DOJ-accredited representative and full-time legal assistant, and a satellite office in Salem. LCSNW also has a large office in Vancouver serving Washington and some Portland and Washington county-based immigrants.

ECUMENICAL MINISTRIES OF OREGON SPONSORS ORGANIZED TO ASSIST REFUGEES (SOAR)

The majority of SOAR's cases are also family-based, permanent residency, work permit, and naturalization petitions; but they also handle a large amount of asylum cases and Cuban-related issues. Most of their clients are also Spanish-speaking and come from Mexico and Central America, but like the other nonprofits, they also serve clients from all over the world, including several from Venezuela, Iraq, Iran and Afghanistan. Approximately 20% of their clients come from outside the Portland metro tri-county area.

Rural Component

SOAR opened a brick and mortar office in Hillsboro in Washington County in 2018, staffed by a full-time attorney and a paralegal. This office primarily serves migrant and farmworker populations in Washington County; however, between 20-30% of the cases come from coastal communities, Yamhill County, and Salem. SOAR also holds naturalization classes in Hood River County and Salem.

All of these nonprofits, plus IRCO, participate in the Mexican Consulate "Mobile Consulate" days. Approximately six times a year, the Consulate "goes on the road" and provides a day of consular services to immigrants in outlying areas. Most of these mobile consulate days also feature "Know Your Rights" seminars and free legal consultations for immigrants provided by the nonprofits and AILA members.

Nonprofit Legal Services Providing Limited Direct Immigration Legal Services

In addition to the four "full service" nonprofit legal services providers that focus exclusively on providing a wide range of direct, proactive immigration legal services and deportation defense in the Portland Metro and select rural areas, there are other nonprofit legal services organizations that provide limited immigration legal services to Oregonians, some in rural areas. These include: the Lane County and Ontario offices of the Oregon Law Center (OLC) and Center for Nonprofit Legal Services in Medford, which offer proactive services on several types of visas; and some offices of Legal Aid Services of Oregon (LASO) that handle crime victim and VAWA cases. In the Portland metro tri-county area, IRCO launched an immigration legal services program in 2018 with one general staff attorney, covering a limited number of case types, and one removal defense attorney (under the Equity Corps program). Also, the Crime Victim Law Center (CLVC) in Multnomah County provides limited immigration legal services including in VAWA, crime, and trafficking victim cases.

The nonprofit and DOJ-accredited representative offices providing limited immigration legal services handled at least **1,186 cases** in 2019, including consultations and advice. Cumulatively, these programs represent about **11%** of the volume of cases managed by the four "full service" immigration legal services providers.

Immigration Legal Services Providers—Accredited Representatives

The U.S. Department of Justice Office of Legal Access Programs keeps an updated roster of organizations it has accredited to provide limited immigration legal services. (Recognized Organizations and Accredited Representatives) These accredited programs do not necessarily have immigration lawyers on staff, nor are the certified representatives required to have a law degree. In fact, most do not; although they are required to receive special training to become certified. In addition to the stand-alone DOJ-accredited representative offices, Catholic Charities, ICS, LCSNW and SOAR also have DOJ-accredited offices and representatives that work alongside attorneys and legal support staff.

As of June 2020, there were 11 organizations, with 16 offices, recognized by the U.S. Justice Department as competent to provide immigration legal services to immigrants in Oregon. Many of the offices not affiliated with the full-service immigration legal services nonprofits did not respond to multiple attempts to gather immigration case data.

Deportation Defense Legal Services

LEGAL REPRESENTATION LAGGING

In the federal FY 2019, there were 3,356 new deportation cases initiated in Oregon, up from 2,227 in FY 2018. Of those cases, only 42% (down from 44% in FY 2018) had legal representation, and 58% were not represented. The number of pending cases is even greater, however, and the rate of representation is not much better.

LEGAL REPRESENTATION RATES ARE LOWER FOR RURAL OREGON RESIDENTS

As can be expected, the further areas are from populated metro areas, the lower the odds of representation. U.S. government data demonstrates that in Pendleton, Hermiston and Boardman—an area that has the 4th highest number of pending cases in the state—clients have only a 50% chance of being represented by a lawyer, and in the first 90 days—the most critical phase—just a 2% chance. In Southern Oregon, including Medford, which ranks 8th in pending cases, the odds of finding legal representation are just 58%. However, in Marion County, which has close access to the Portland metro area, the odds of representation in deportation cases are closer to 70%.

RURAL DOJ-ACCREDITED OFFICES

Only seven of those offices are located outside the Portland metro tri-county area: four offices are in Marion County and one office each in Hood River, Jackson, and Yamhill Counties:

- ICS Hood River satellite office
- LCSNW McMinnville satellite office and Salem extension office
- New Life Church of the Nazarene, Medford (pending renewal Jan 2020)
- Causa Oregon, Salem (pending renewal Jan 2020)
- Somos Hispanas Unidas, Silverton
- Centro de Servicios Para Campesinos (PCUN), Woodburn

PORTLAND METRO TRI-COUNTY AREA DOJ-ACCREDITED OFFICES

- United Services for Counseling (pending renewal January 2020), Clackamas and Portland headquarters offices, (both Pending renewal January 2020)
- SOAR Portland and Hillsboro Offices
- Catholic Charities Portland Office
- ICS Portland Office
- Immigration Connection PDX, Portland
- Innovation Law Lab, Portland
- LCSNW, Portland Office

EQUITY CORPS: THE NONPROFIT COLLABORATION TO EXPAND LEGAL SERVICES FOR DEPORTATION PROCEEDINGS

Deportation cases are incredibly complex, making them expensive, time-consuming, and resource intensive. In the past three years, with the Administration’s introduction of stringent new regulations, policies and procedures, a single case can easily take 75-100 hours of an attorney’s time. It is not unusual for private attorneys to charge upwards of \$20,000 to defend a deportation case. And these cases quickly become even more expensive for immigrants who are detained in the Tacoma Northwest Detention Center. Among other things, most cannot afford the expensive bail or the cost of an Oregon attorney to travel to Tacoma. Impacted families are often left without the primary wage earner.

In an effort to mitigate some of these damaging effects, in 2018 the Innovation Law Lab, ICS, Catholic Charities, SOAR, Metropolitan Public Defender, and IRCO—together with other non-legal community partners—created “Equity Corps,” a collaborative effort to provide free deportation defense services to immigrants in proceedings.

From October 2018 through March 2020, the City of Portland provided \$500,000 and Multnomah County \$250,000, to fund five .8 FTE deportation defense attorney positions at ICS, SOAR, MPD, Catholic Charities, and IRCO, plus case management and coordination services provided by Innovation Law Lab (ILL). Multnomah County provided additional funds for “navigators.” The Equity Corps nonprofits provided legal services to immigrants in deportation proceedings who were

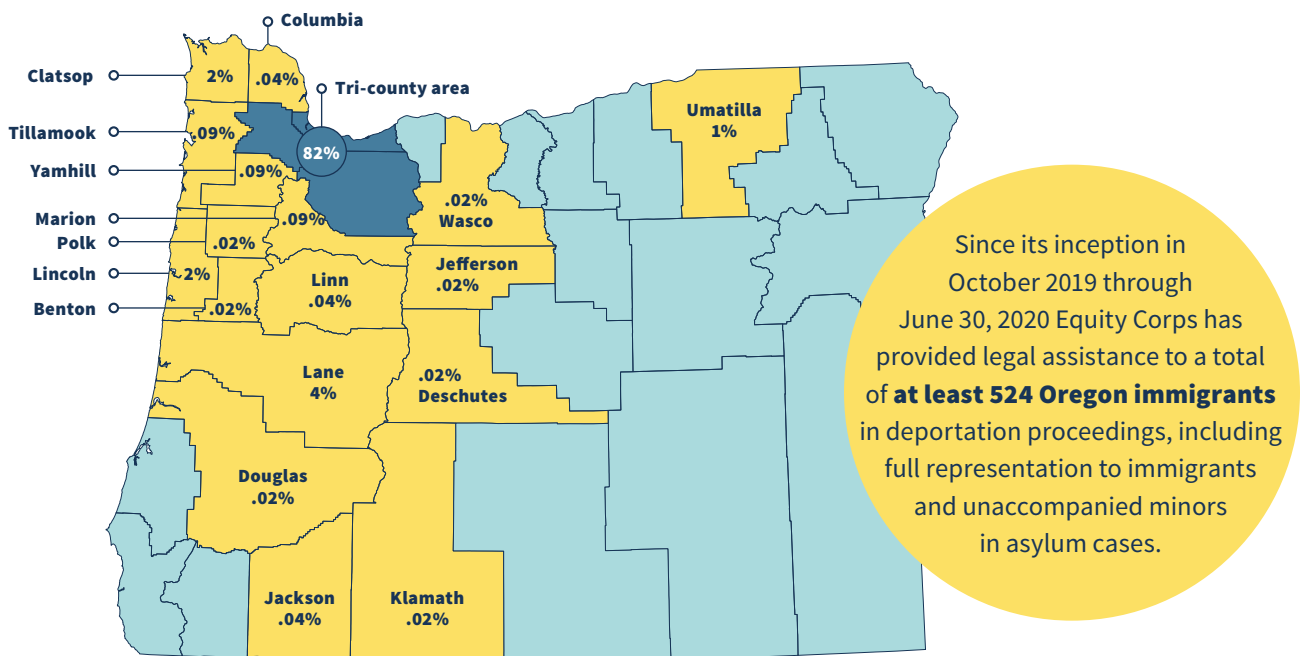
residing in, or with some connection to, the City of Portland and Multnomah County. These five direct services attorneys provide both limited term representation (help with preparing and filing applications for relief in immigration court, including asylum) and direct removal defense. Direct removal defense services under this program begin only six months prior to a client’s immigration court hearing.

EQUITY CORPS FUNDING FOR 2020

In October 2019 the State of Oregon agreed to provide \$2M in funding over two years to expand these deportation defense services statewide. However, the City of Portland funding was reduced to \$250,000 for FY 2021 and Multnomah County funding for attorney positions was eliminated in March 2020. These reductions in funding by the City of Portland and Multnomah County could lower the overall amount of funds available for Equity Corps services from public sources by nearly \$500,000 after October 2020. Currently, seven .8 FTE attorney positions are funded through the end of the two-year state funding cycle, and given that all but one of these attorneys are located in Portland, rural clients may still face considerable barriers to obtaining legal representation.

In 2019 alone, Equity Corps assisted 453 immigrants in deportation proceedings who otherwise may not have received legal help.

Map 6. Equity Corps Matters



Since its inception in October 2019 through June 30, 2020 Equity Corps has provided legal assistance to a total of **at least 524 Oregon immigrants** in deportation proceedings, including full representation to immigrants and unaccompanied minors in asylum cases.

THE VAST MAJORITY SERVED ARE IN THE PORTLAND METRO TRI-COUNTY AREA

In 2019, Equity Corps providers handled 363 “pro se” cases (where lawyers provide advice and assistance with specific deportation matters but do not take on full representation in a deportation case), and provided “full representation” in 89 pending asylum and unaccompanied minors cases. 82% of those pro se and full representation matters were for individuals located in the Portland metro tri-county area (see Map 5).

Because of the extensive backlog pending in Portland’s immigration court, most of these pro se and asylum cases will not be ready for hearing until at least 2021 and beyond—raising the question of what will happen with remaining pending cases once the funding sunsets.

82% of those pro se and full representation matters were for individuals located in the Portland metro tri-county area.

“Crimmigration” Legal Services

Until the 1980s, non-citizens did not suffer immigration consequences for most non-serious crimes. However, in the mid-1980s, that began to change. Increasingly, immigrants (and now, even permanent residents and naturalized citizens) have faced serious immigration consequences for even minor infractions that may be decades old, or even juvenile or other crimes that have been expunged. This trend has only accelerated under the Trump administration.

“Crimmigration” refers to the merging of criminal and immigration law and most immigration practitioners have become extraordinarily careful about exploring their clients’ backgrounds. In 2010, the United States Supreme Court recognized the seriousness of these immigration consequences in its decision *Padilla v. Kentucky*, 130 S. Ct. 1473 (2010). In this decision, now widely known as “Padilla”, the Court ruled

that criminal defense lawyers are required to advise their non-citizen clients facing a guilty plea that they could likely be deported as a consequence.

In 2019, two nonprofits provided “crimmigration” legal advice in over 800 matters.

OREGON JUSTICE RESOURCE CENTER AND THE PADILLA PROJECT

As a result of the Court’s *Padilla* ruling, several years ago the Oregon Public Defense Services (OPDS) established the “Padilla Project” to provide advice and counsel to public defenders it contracts with throughout Oregon on how criminal charges will affect their clients’ immigration status. The Oregon Justice Resource Center (OJRC) has held the statewide “Padilla Project” contract since 2018, working directly with criminal defense lawyers by providing immigration legal advice and research. In 2019, OJRC fielded services to attorneys in a total of 451 matters.

The OJRC reports experiencing a “definite increase” in the number of intakes it has processed between 2018 and 2019, and again into the first months of 2020. In 2018, OJRC had a total of 366 requests for assistance, and in 2019, that total increased by over 20% to 451 requests. In just the first two months of 2020, OJRC has seen almost twice the number of intakes as they did during the same period in 2019. OJRC does not yet have a clear picture as to the reasons for these annual increases. Although no case analyses have been performed as of the date of this report, staff is fairly certain that most of these intakes deal with relatively “low level” types of criminal charges.

METROPOLITAN PUBLIC DEFENDER (MPD)

MPD contracts with OPDS to provide public defender legal services in Washington and Multnomah Counties, and runs its own internal Padilla project for its in-house lawyers. In addition, MPD also has a grant-funded staff team (two attorneys and a paralegal) that handle “crimmigration” cases, and deportation defense cases under contract with Innovation Law Lab through Equity Corps.

In 2019, MPD reported 472 open immigration cases. Only about 3% of those cases were for individuals living or working outside the Portland tri-county area. Of those cases, approximately 40% were deportation defense, 31% were asylum cases, 27% were “crimmigration” cases, and 2% covered other types of immigration issues. MPD’s client profiles mirror those of the other immigration legal services nonprofits. The vast majority of their clients had occupations in the service industry, farming, construction, and landscaping. Most were from Central America or Mexico and spoke Spanish. The second and third most-spoken languages include K’iche’ and Chuj. 100% had household incomes below \$45,000 a year.

Perceived Characteristics of Private and Nonprofit Legal Services in Rural Communities

Most of the private and nonprofit legal services providers are well-regarded by the immigrant communities they serve in Oregon. Seventy-three percent of survey respondents reported that there was at least one private immigration lawyer within 25 miles of the largest city in their area. They reported these private lawyers provided services to low-income clients as well as language and culturally competent services for immigrants (Figure 11).

Only 61% of respondents reported that there was access to free or low-cost immigration legal services for members of the immigrant community within 25 miles of the largest city in their county. Although 85% of respondents who reported no access to free or low-cost nonprofit immigration legal services within 25 miles of their community, they reported that they were able to obtain some access, although the type of access was not identified, nor information about whether those agencies could actually provide assistance with cases.

Of the four nonprofit immigration legal services providers in Oregon that provide full direct and defensive immigration legal services to low income immigrants, respondents reported (Figure 9).

Figure 9. Awareness of primary nonprofit immigration legal service providers



Those who were aware of nonprofits in Oregon providing some limited direct immigration legal services to low income immigrants anywhere in the state, not just limited to rural areas (Figure 10).

Figure 10. Awareness of other nonprofit immigration legal service providers

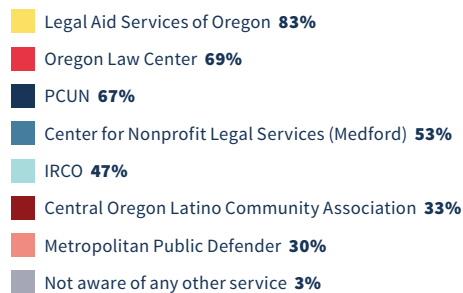


Figure 11. Respondents' perception of private providers that provide low-cost legal services

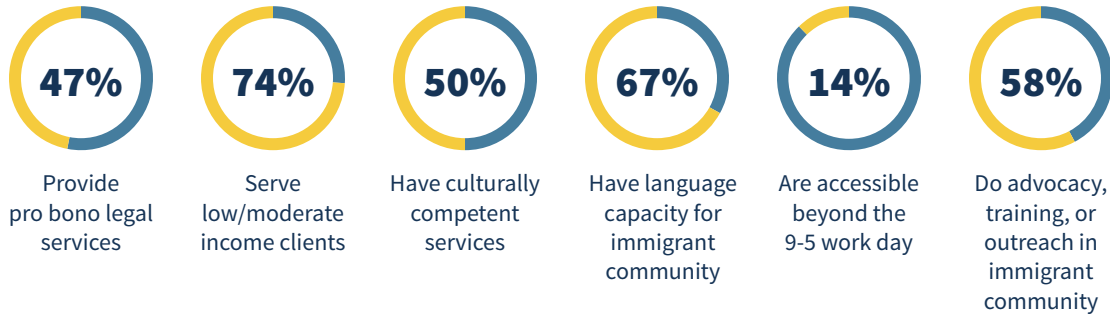


Figure 12. Respondents' perception of nonprofit providers that provide low-cost legal services within 25 miles of the largest city in their county

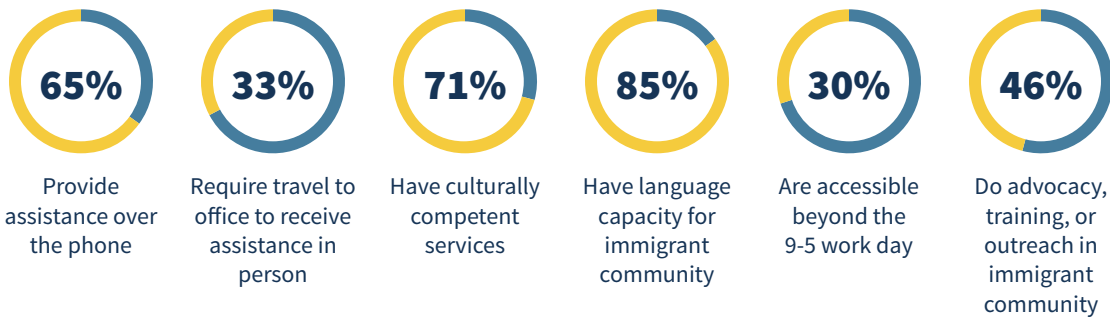
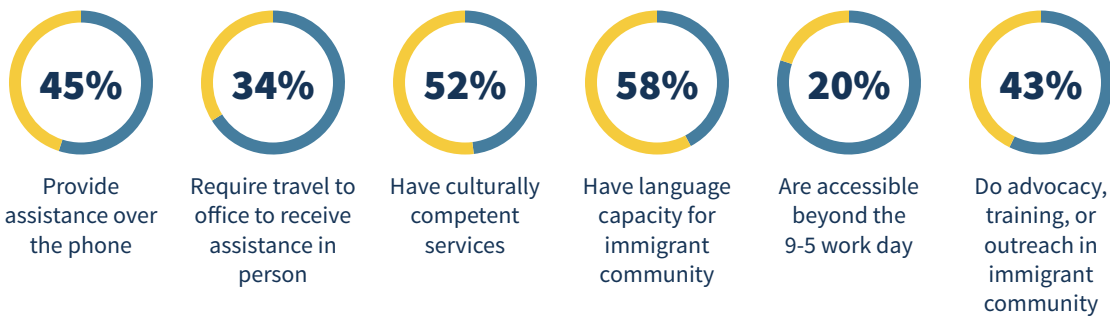


Figure 13. Respondents' perception of nonprofit providers that provide low-cost legal services further than 25 miles of the largest city in their county



■ Yes
■ No / Don't Know

Return on Investment for Funding of Nonprofit Immigration Legal Services

“The actual benefits—primarily from employment—will continue for a potential additional 20 years beyond this matching time frame and would result in significantly higher positive economic benefit and return on funding investment results.”

—CSACO Report to the OLF, “Oregon’s Legal Immigration Services Social Economic Impact and Return of Funding Investment Analysis for the Year 2018”

Social return on investment (SROI) is a concept that has been developed and refined for the last 60 years to measure the impact of nonprofit organizations’ work, which cannot be easily measured in solely financial terms. A 2018 study commissioned by the Oregon Law Foundation, which provides significant funding to several of Oregon’s nonprofit immigration legal services providers, concluded that the social impact return on initial funding investment was **27,006%**.

The report also concluded that the immediate gross value of the legal services provided in 2018 by ICS, SOAR, Catholic Charities, and LCSNW was **\$5,292,000**. The immediate gross value is defined as the fair market replacement cost value of those services, e.g., what it would cost members of the community to replace these services if these immigration legal providers did not exist. It also found that the long-term consequential financial impacts to the community of these services are **\$1,288,904,000**.

The **value** of the legal services provided in 2018 by the four “full service” nonprofit legal services was **\$5,292,000**

A 2018 study commissioned by the Oregon Law Foundation, which provides significant funding to several of Oregon’s nonprofit immigration legal services providers concluded that **for every \$1 invested** in Oregon’s nonprofit immigration legal services during the year, the **citizens of Oregon receive almost \$5** of immediate and long term consequential and financial benefits.

Immigrants Access Information About Immigration and Immigration Legal Services Through Trusted Connections

Establishing trust within immigrant communities is a fundamental prerequisite to effectively reaching immigrant communities, and providing immigration legal services and education about their rights. This is especially difficult in rural areas, not only because of distance, but because any immigrant communities—especially Indigenous/Mesoamerican—have suffered horrific violence and exclusion in their own countries and continue to suffer discrimination, fear, and exploitation in Oregon. Most nonprofit legal services providers understand that building trust takes time, and a key to breaking down barriers is establishing strong, continuing relationships with individuals and organizations most trusted by those immigrant communities.

Not surprisingly, all community members uniformly report that those most trusted in immigrant communities are family members, culturally specific individuals, and culturally specific social service nonprofits. Those not at all trusted include law enforcement, court staff, and government agency employees.

Survey respondents concluded that family members, culturally specific individuals in the community, and culturally specific organizations are the most trusted in immigrant communities (Figure 14).

The most important routes to accessing information to answer immigration or legal questions are **family members**, **nonprofit immigrant/culturally specific social services providers**, and **culturally specific individual community members**.

Figure 14. Most trusted individuals and organizations, according to respondents

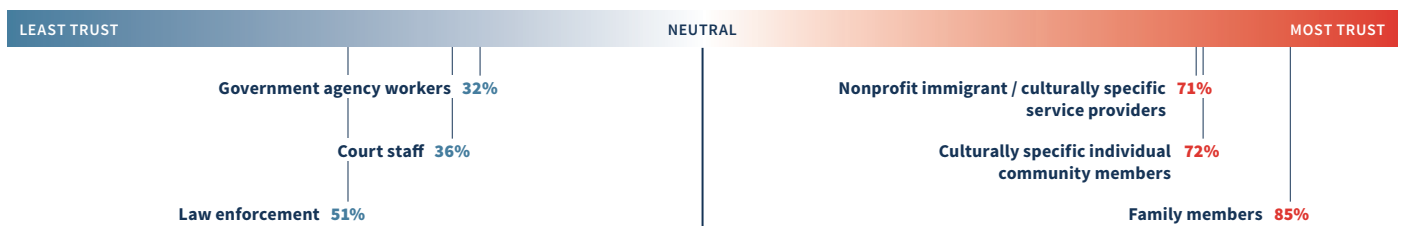
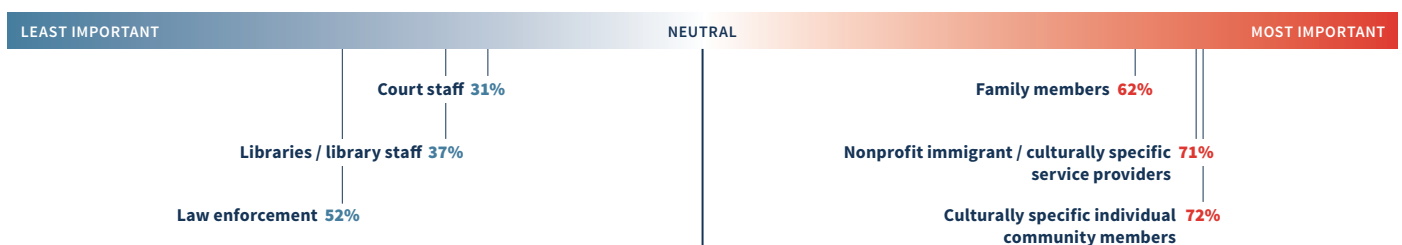


Figure 15. Most important routes to accessing information, according to respondents



THE MOST EFFECTIVE METHODS TO REACH RURAL IMMIGRANTS TO ADVISE THEM OF THEIR RIGHTS, AND/OR HOW TO ACCESS FREE AND LOW-COST LEGAL SERVICES IS THROUGH *KNOW YOUR RIGHTS* SEMINARS AND COMMUNAL ACTIVITIES

Rural immigrant communities, like their urban counterparts, are surprisingly diverse. Hundreds of different Central American and Mexican Indigenous/Mesoamerican immigrants live in areas like Newport, Umatilla, Cottage Grove, and many other communities, and have their own languages, customs, and trusted individuals and organizations. For example, Mam immigrants in Newport have several “comites”—groups of trusted individuals—who meet regularly and attend to numerous needs within the larger Mam community, whose members work primarily in the fishing, hospitality and agricultural industries. Often these Indigenous/Mesoamerican communities are discriminated against by non-Indigenous/Mesoamerican Spanish-speaking immigrants who bring enduring biases with them from their home countries.

Not only do these individual communities differ, but also individual immigrants within these communities have substantially different methods of learning, language and literacy abilities, and different understanding and comfort with technology. Despite these differences, nonprofit legal services providers have few resources to provide a diverse and robust array of outreach and educational methodologies to successfully engage these “communities within communities.”

Study participants, including survey respondents, uniformly reported that in-person *Know Your Rights* seminars are by far the most successful at reaching a broad range of immigrant populations. With the COVID-19 health emergency, however, some rural immigrant communities have become accustomed to attending church services and other cultural events through media such as Facebook Live—as long as they have Internet access and a device—and immigrant-specific social services have had some success in holding online seminars on Facebook. Many have also become familiar with various types of social media and are becoming more comfortable with these communication channels, especially if they have children or young adults in the household. Several community members report that other media, such as WhatsApp and Instagram, are familiar to immigrants, including those from Indigenous/Mesoamerican communities.

Several immigrant community members stressed the importance of creating different types of simple messages for communicating concepts that may seem simple or familiar to a U.S. citizen or long-time immigrant permanent resident, but which are completely foreign to many. For example, short YouTube videos and simple graphics to explain the concept of what to expect in a USCIS interview, even things like what the room may look like, where the agent sits, etc.; or how to prepare for a visit to a lawyer, can go a long way to relieving anxiety (Figure 17).

Study participants, including survey respondents, uniformly reported that in-person *Know Your Rights* seminars are by far the most successful at reaching a broad range of immigrant populations.

In addition to considering different methods of communication, nonprofit legal services providers need to engage individuals and organizations that are viewed by the community as effective communicators to help organize educational outreach and messaging. Survey respondents reported that nonprofit immigrant and culturally specific social services providers, culturally specific community members, and family members were the most effective as trusted messengers and organizers; and that law enforcement, court staff, employers, and government agency workers were among the least effective (and least trusted) (Figure 18).

Figure 16. *Know Your Rights* seminars have been most helpful for immigrants

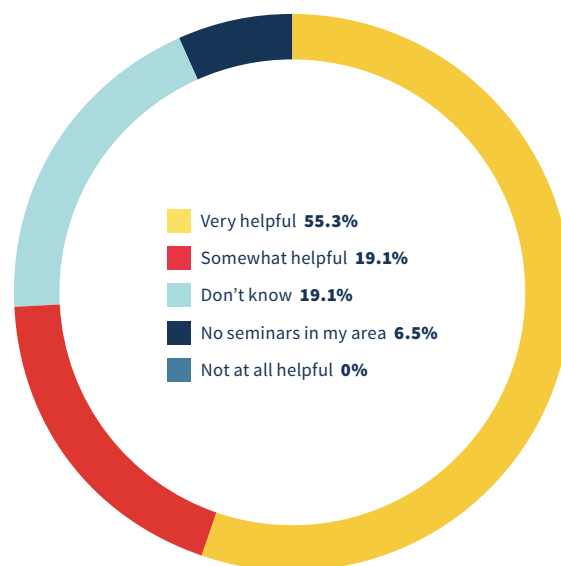


Figure 17. Most effective communication methods, according to respondents

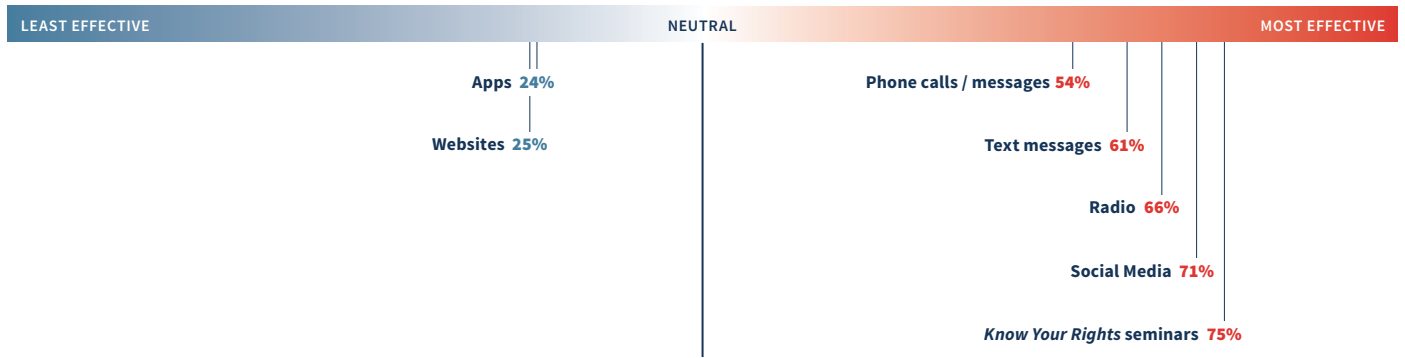
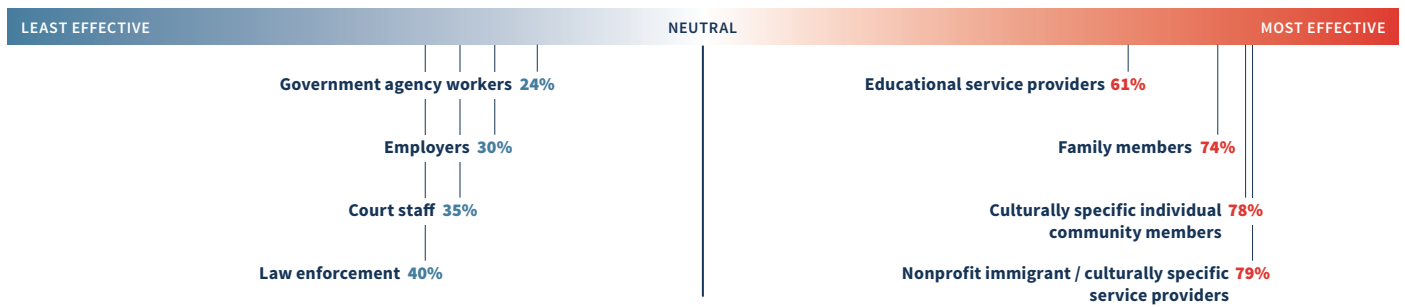


Figure 18. Most effective communicators, according to respondents



SPOTLIGHT

Focus on Developing Effective Outreach Methods for Meeting Rural Immigrant Communities Where They Are



“People carry the potential of knowledge, especially when they are allowed to participate. They come out as actors in their own lives, with more confidence, which facilitates breaking the fear.”

—Emiliana Aguilar Reynoso

Emiliana Aguilar Reynoso knows of what she speaks. As a Guatemalan immigrant from an Indigenous/Mesoamerican community who speaks K’iche, Spanish, and English, Emiliana experienced extreme persecution at the hands of the Guatemalan government, and for decades has worked tirelessly with communities who have experienced torture and death. She explains:

“Most of us come from a situation of repression, of kidnapping, racism, discrimination, and violence. This history that we bring in our lives many times closes us in our own world. In addition, the undocumented among us have experienced these anti-immigrant laws. People just assume that if they don’t have documents they are illegal and have no rights. Finding ways to break this fear is hard.”

Know Your Rights seminars should be better attuned to each audience. Education is also an opportunity for cultural expression. “Community education events should be cultural and reaffirm and recognize the identity of the people attending. People should be able to feel comfortable and identify with something that connects with their culture—perhaps Guatemalan music, food, a small dance performance, and flyers in Maya language so people know that they are included and their needs are understood.”

Several decades ago Brazilian educator Paulo Freire pioneered “educación popular” a participatory approach to education that empowers people to use life experiences to develop their learning. Many immigrants, especially those from Indigenous/Mesoamerican cultures, have deep respect for this communal approach that values incorporating personal experience over a hierarchical teacher-student methodology that tends to silence voices. Emiliana encourages nonprofits to adopt more participatory methods, such as arranging chairs in a circle rather than rows, conduct short lectures interspersed with small group activities featuring hypothetical situations, interactive questioning, and use of simple language geared toward the particular audience.

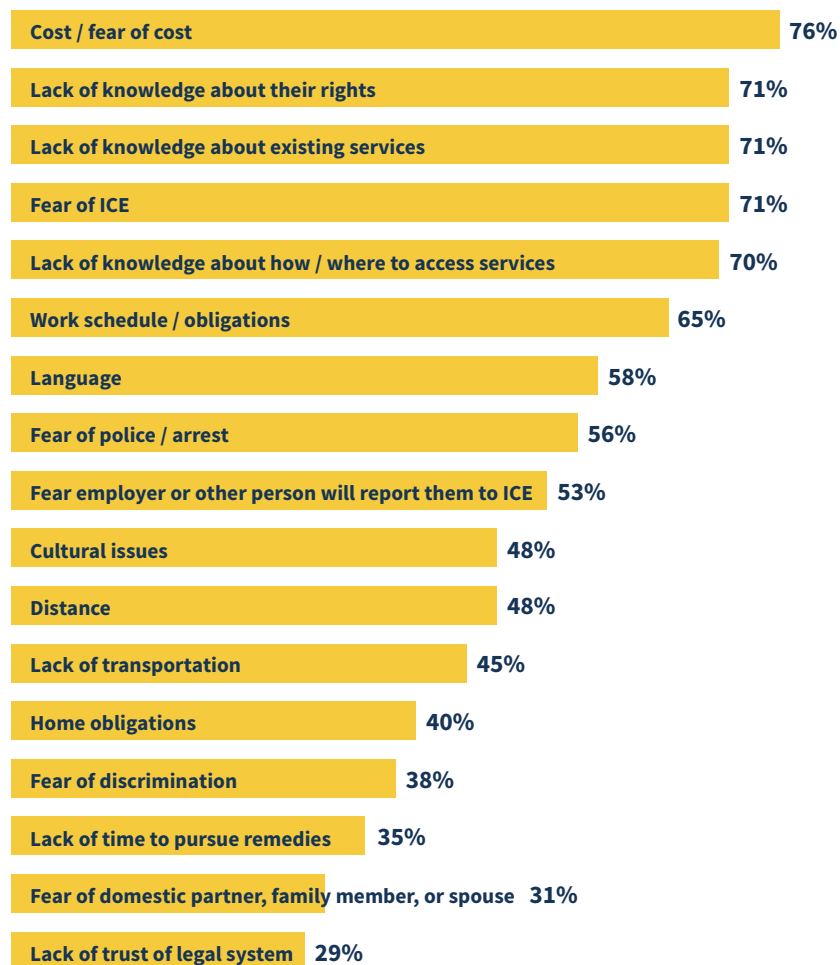
She also encourages the use of evaluations at every seminar. People should have the opportunity to provide feedback about what they learned, and whether the methodologies worked for them. By giving them an opportunity to evaluate the learning experience, “people feel valued, like they own the material.” It is also important for legal services providers to assess whether materials and methods work effectively for their audiences.

Gaps In and Barriers to Legal Services

Community Members Say Cost is the Most Significant Barrier

Across the board, study participants report that the cost of even nominal nonprofit attorney fees remains significant for the majority of rural immigrants, but by far the biggest barrier is the increasing cost of visa application fees. The problem of cost is followed closely by ongoing problems in communication, immigrants' lack of knowledge about their rights and about existing services or how to access them, fear of police and of ICE, language barriers, and demanding work schedules that don't permit access to legal offices' limited office hours.

Figure 19. Problems ranked important by survey respondents



Legal Services Immigration Nonprofits Agree Cost Is an Insurmountable Barrier

Financial issues are a barrier both for nonprofit legal services providers and their rural clients. Providers report that the biggest issue they face is the inability of their clients to afford the cost of applying for a visa. Most immigrants living in rural areas work low-wage jobs, such as those in hospitality and service industries, construction, and agriculture; and although they may be able to scrape together \$50 for a nonprofit legal consultation fee, they often cannot afford the USCIS filing fees for family members, visas, permanent residency, work permits or naturalization.

“Fees are a barrier to justice for our clients. Even if families have very limited income, they try and find legal assistance, but the USCIS fees are too big of a barrier.”

—Alma Jean, LCSNW Attorney

“The biggest barrier is money. Even if we could provide free consultations to everyone, it wouldn’t go very far with the clients we serve. We are seeing people that even if we give them a free service, they have to choose between rent or food or paying for a green card. The Administration has imposed policies that favor wealthy immigrants and they have taken measures to effectively exclude low-income immigrants. USCIS has implemented incremental fee hikes and another is coming soon, and some application fees are going up by as much as 83%. The government is now denying a lot of fee waivers for families that cannot pay—more than we have seen in the past.”

—Caroline Van der Harten, SOAR Legal Director

In addition to their clients’ inability to access services because of cost, the legal nonprofits report that the biggest barrier to their ability to reach rural immigrants also is a financial one. It takes tremendous resources to build relationships and conduct effective culturally and linguistically appropriate outreach in immigrant communities, especially in isolated rural areas.



Isaac Alley
ICS Managing Attorney

“Building trust takes a lot of time and financial resources, and we are all understaffed. Bringing justice to legal deserts is always more expensive because the social infrastructure has never been developed before. And while deportation defense is really expensive, a more affirmative approach lends itself to reaching more victims—such as victims of trafficking and crime—who remain hidden away by predators or intimidated into silence. To the extent we possibly can we must help them, and get these predators out of our communities.”

—Isaac Alley, ICS Managing Attorney

“Our biggest barrier is resources. We have the expertise but staffing up an office in a rural area is difficult. One of the issues in doing outreach outside the tri-county area is building up the trust. Building relationships with parishes and others is difficult, we need more resources.”

—John Herrera, Catholic Charities Legal Director

Geography—Rural Oregon is a Patchwork of Legal Deserts

Numerous articles and studies report, and Oregon’s nonprofit and AILA member legal advocates confirm, that proactive legal services are the most effective—and cost-effective—way to reduce fear, trauma, and the danger of deportation. Deportation legal defense services are much more expensive, resource-intensive, risky, and trauma inducing than proactive legal services. However, immigrants who are fearful of coming forward, who lack Internet or consistent telephone coverage or a computer, who work odd or inconsistent hours, or who do not have sufficient transportation, often have no way to access immigration legal services. These factors are magnified exponentially in rural areas where there are no low-cost legal services.

Fear of ICE, police, discrimination, and courts, as well as cultural and language barriers, also keep many rural immigrants from traveling distances to access services that might provide them a pathway to legalization. Community members report that perhaps one of the most effective ways of reaching immigrant communities is through trusted leaders, such as faith healers and clergy, and respected elders. However, the nonprofit legal services providers currently do not have the capacity or substantial resources to build these trusted relationships over great distances.

As immigration legal services providers consistently report, undocumented immigrants, especially those in rural areas, are fearful of seeking not only immigration legal assistance but for legal issues that are exacerbated by their lack of status, such as wage theft, intimidation and discrimination, unsanitary and unsafe work and living conditions, and human trafficking.



Community members report that perhaps one of the most effective ways of reaching immigrant communities is through trusted leaders, such as faith healers and clergy, and respected elders. However, the nonprofit legal services providers currently do not have the capacity or substantial resources to build these trusted relationships over great distances.

IMMIGRANTS LIVING IN ISOLATED AREAS SIMPLY CAN'T ACCESS LEGAL SERVICES

“Accessing legal services for rural clients is more difficult because there are not advocates in rural areas; in the Portland metro tri-county area, accessing services for immigrants is just an issue of capacity of the providers, not their location. We have a good number of nonprofits and AILA attorneys readily available.”

—John Herrera, Catholic Charities Legal Director

GREAT DISTANCES EXACERBATE OTHER BARRIERS AND ABUSES

“The distance is a real obstacle. Even for clients coming to our Hood River office we often hear of drives in excess of 3–4 hours. People have to rely on black market taxis to comply with the immigration process. For example, there is one service that operates between east of Hood River to Portland immigration court, and people are paying about \$400.”

—Isaac Alley, Managing Attorney, ICS



Caroline Van der Harten
SOAR Legal Director

“Building trust is most vital. Whenever we go into a new place, or something new comes up, our biggest challenge is building trust. Frequently we encounter notarios or someone’s friend who has been helping people unlawfully complete immigration applications. We have to gain trust in the community without discrediting well-meaning people who have been helping. We try and find trusted organizations, community and faith leaders that people go to for help. It is difficult to educate people about not using notarios and to help them understand why they need an attorney.”

—Caroline Van der Harten, SOAR Legal Director

DISTANCES EXACERBATE EXISTING INEQUALITIES AND LINGUISTIC AND CULTURAL BARRIERS

Even with coordination, it’s difficult to find culturally appropriate and linguistically competent translation and interpretation services, as well as other social services, especially in rural Oregon, and especially for Indigenous/Mesoamerican languages.



Alma Jean
Attorney, LCSNW

“There are a lot of trust issues, especially for Indigenous/Mesoamerican clients, like those from Guatemala, living in rural and in coastal areas. Some may come to Portland because they can find an attorney and then will refer family members. But I think there are a lot more people from Indigenous/Mesoamerican communities who don’t know who to trust.”

—Alma Jean, Attorney, LCSNW

How the COVID-19 Crisis Has Impacted Immigrants and the Immigration Nonprofit Legal Services Providers

What Government Data Says

As of May 2020, immigration courts nationally had a backlog of over a million cases. In March, the Executive Office for Immigration Review (EOIR) began to cancel removal hearings, putting many of these cases on hold, potentially for several years. At the end of April 2020, EOIR data reported canceling over 200,000 immigration court hearings and experts project that it may be years before these cases can be rescheduled and resolved. Estimates based on government data available as of July 1, 2020 are that approximately 385,000 immigrants with pending hearings, or nearly one-third of the total awaiting hearings, have been adversely affected. It is projected that more than 850,000, or two-thirds, may be adversely affected by the court's shutdown once the rest of the court's backlog is accounted for.

“Filing fees suddenly even more unaffordable—for many clients it is now a question of, do I eat or do I apply for DACA?”

—Isaac Alley, ICS Managing Attorney

What the Nonprofit Immigration Legal Services Providers and Community Members Say

IMMIGRANT'S FINANCIAL AND HEALTH ISSUES ARE INTERTWINED AND THE MOST URGENT ▶

→ **Low-Wage Workers.** The COVID-19 crisis has probably done the most damage to clients that are field workers, truck drivers, those who work in processing plants, and those who work in the hospitality industry. One in seven essential workers in Oregon are immigrants. Put another way, Oregon's immigrants are 54% more likely be essential workers than other Oregonians. There have been several COVID-19 outbreaks in places staffed primarily by immigrants, especially in counties that rely heavily on immigrant labor, such as in Umatilla, Hood River and Lincoln Counties. Most of these workers are not paid for time off work when sick. Many of those who are most affected are Indigenous/Mesoamerican immigrants. In addition to working conditions that are conducive to the spread of coronavirus, many migrant workers live in crowded farm worker housing, thus increasing their risk of exposure even further.

→ **Children of Low-Wage Workers.** The pandemic has been devastating for immigrant children, many of whom struggle with traditional schooling and language issues. Not only have they been deprived of education for months on end, but many also lack reliable connections to the Internet. Even worse, many have been left home alone for hours while their parents are working at low-wage jobs to keep a roof over their heads and food on the table.

→ **DACA Recipients.** Nonprofit immigration legal services providers say that at least one-third of DACA recipients are in financial distress because of job layoffs or a medical emergency or both. They are not able to pay the nonprofits' low consultation fees nor USCIS visa application fees, many of which have doubled in the last two years. In addition to concerns about their immigration situation, they are saddled with overwhelming concerns about not being able to go to the doctor if they are sick because they have no insurance, as well as fears that seeking healthcare or finding employment will increase their chances of being detained by ICE or stopped by police.

→ **Increased Strain on Immigration Legal Nonprofits' Resources and Client Lack of Access to Technology.**

All of the legal services providers have had to make sudden, unplanned, significant investments in technology since they have been unable to work with clients in-person since mid-March. Connections with clients have also become much more difficult. Most clients have difficulty using sophisticated technology for a variety of reasons, even through their smartphones. It now takes up to three times longer for legal workers to connect with clients through technology. A common refrain, especially among older clients and those with cognitive issues, is that they want to wait for an in-person appointment where they feel more comfortable communicating and can bring along a family member if necessary. ICS's Hood River Office is experimenting with a "Zoom Room" concept, where clients can come into the "trusted" office, and sit in an isolated room where the attorney can talk to clients over Zoom from the next room. This is also an effective method for domestic violence victims whose phones and computers may be heavily monitored by abusers to have a safe space to "meet" with a lawyer.

→ **Extreme Anxiety in Immigrant Communities and ICE Enforcement.**

In addition to mounting anxiety about keeping a roof over their heads and food on the table, and working in unsafe environments, immigrants report "nightmares" with ICE, especially for immigrants who are required to regularly "check in" with ICE while awaiting court proceedings. For example, the ICE office in Eugene never provided notice to any immigrants, but just pasted a sign in English and Spanish that the office was closed and people were to "call in." Many traveled from as far as the coast and Douglas County, only to find a sign on the door they couldn't read. Those who called in reached only busy signals, causing panic for many people who could not get through. When ICE finally sent out letters about the resumption of in-person appointments, they did not reach many people. ICE also sent out a letter about re-opening the Eugene Office, which turned out to be false—community members had to contact the Portland field office to get the correct information. Although community members have reached out to the state's two U.S. senators, who they say have been sympathetic, they have been stumped as to how to make any impact to date.



Oregon's Legal Community Shoulders Some Responsibility for the Gaps in Immigration Legal Services

Oregon has for a very long time had only four nonprofits providing a wide range of affirmative and defensive immigration legal services to low-income immigrants. Immigration Counseling Service (ICS) was Oregon's first nonprofit immigration legal services provider, founded in 1978 by Margaret Godfrey. ICS was followed shortly by Lutheran Community Services NW Immigration Legal Services, in the mid-1980s by Catholic Charities, and a few years later by SOAR—all projects that are part of larger multi-service organizations.

For over 40 years, these immigration nonprofit legal services providers have served over 10,000 immigrants a year, and successfully represented hundreds of thousands of Oregon's rural and urban immigrants. Thanks to their work, countless Oregon families and communities enjoy stability and vibrancy. However, these providers and the other smaller immigration nonprofits have operated almost completely separately from, and rarely interface with, the Oregon State Bar, the courts, and traditional civil legal services providers in the state. There are many reasons for this, perhaps the most important being that immigration law is a federal agency administrative process, not a state one.

Furthermore, immigration judges are not part of the independent judicial branch of federal or state government, but rather are employees of the Executive branch via the Department of Justice subject to the President's and Attorney General's political mandates. Additionally, although lawyers who practice immigration law are required to be members of a state bar, they are not required to be members of the Oregon State Bar. Also, federal immigration law allows qualified non-lawyers (DOJ-accredited representatives) to represent immigrants in administrative and immigration court proceedings. For these and several other reasons, these nonprofits have largely operated alongside, but separately, from the Oregon legal system. This lack of interaction has had some unfortunate consequences, including, but not limited to:

SEVERE UNDERFUNDING

For their entire existence, all of these nonprofits have had to rely primarily on philanthropic donations and grant funding from a wide range of sources to survive. Although they each receive support from the Oregon Law Foundation, which administers the Interest on Lawyers Trust Account (IOLTA) program, they have never been included in the Oregon legal community's Campaign for Equal Justice, which has raised millions of dollars—several hundreds of thousands of dollars annually—from the legal community for Legal Aid Services of Oregon and the Oregon Law Center, the two agencies that serve immigrant clients in other civil legal matters. The immigration legal services nonprofits also do not receive any funding from the national Legal Services Corporation, which funds Legal Aid Services of Oregon (and LSC does not allow representation in immigration cases except in very limited circumstances).

LACK OF COORDINATION AND COLLABORATION

Since 2016 there has been more robust collaboration across these different legal service delivery systems, especially with regards to outreach efforts between the immigration legal services providers and Legal Aid and Oregon Law Center. However, beyond joint outreach events and some regular meetings and small initiatives, there have been no serious discussions about designing collaborative and coordinated service delivery initiatives. Nor have there been any serious efforts made by the Bar, LASO, OLC, the Campaign for Equal Justice, or the state courts to formally bring the immigration legal services providers into seats at the justice system’s policymaking, programmatic, or fundraising tables.

Given that the 2018 Oregon Civil Legal Needs Study cited immigration concerns as the most damaging to low-income Oregonians, and that immigration legal status can bring stability to so many impoverished Oregonians and diminish the effects of other civil legal needs—such as wage theft, consumer issues, and evictions—it is surprising that the broader legal community has yet to make a meaningful effort to reach out to embrace these immigration legal providers and invite them to the justice table. The failure to seek out and include the voices of immigration nonprofit legal services providers has had damaging consequences, not the least of which has been the ongoing and severe underfunding of immigration legal services for some of the most marginalized members of Oregon communities.



Underfunding has led to overburdened and underpaid legal workers, high rates of burnout and staff turnover, and underinvestment in the capacity and infrastructure needed to adequately serve rural immigrants. We can hardly claim to be a Sanctuary State if we do not adequately provide resources to make it a reality.

Additional negative effects include the continued siloing of civil legal services to immigrant communities and missed opportunities to build trust between immigrant communities and the courts, which survey respondents ranked among the least trusted institutions by immigrant community members.

How Do We Move Forward? Recommendations for Immediate Action

“The Oregon Advocacy Commissions (OACs) bring the voice and Equity Lens of underrepresented communities statewide to the policy table. The OACs achieve this by researching issues, informing, providing advice for state policy makers and decision makers, including the Governor, legislators, and departmental leadership, on ways to improve the success of all Oregonians, and growing diverse leadership into state government.”

—Oregon Advocacy Commissions Office Website

It’s Time for Oregon’s Policymakers to Give Immigrants a Place at the Advocacy Table

Oregon has four Advocacy Commissions focused on specific underrepresented populations: Commission on Black Affairs, Commission on Hispanic Affairs, Commission on Asian and Pacific Islander Affairs, and the Oregon Commission for Women.

Oregon should establish a commission that recognizes, and will represent, over 10% of Oregon’s population, and one-quarter of its children. For over a century, Oregon has welcomed immigrants to its fields, forests, fisheries, and nurseries; to contribute to its tax base; and now to serve as essential workers during the COVID-19 health emergency—it is time to give them a seat at the policymaking table. By creating such a commission, Oregon policy makers, funders, community organizations, businesses, and nonprofits will be empowered to make more informed, accurate decisions affecting the lives of all Oregonians.

This Commission should immediately begin work on collecting accurate data that will inform a robust, coherent study on the demographics, contributions, and needs of Oregon’s immigrants, especially in rural areas.

Accurate and Centralized Data Collection, Reporting, and Advocacy

Currently, there is no centralized data collection or data sharing about Oregon immigrants. Myriad data is collected by social services and legal services providers, funders, and state agencies such as health, education, court language access, migrant and seasonal farm labor, farm labor contractors and agricultural housing, employment, workers compensation, and more. However, all of this data is siloed, often hard to find, and sometimes internally inconsistent. Given the numbers of immigrants in Oregon and their profound contributions to the state’s economy and culture, it is imperative that policy makers have access to accurate, up-to-date, and actionable data.

Conduct a Study of Immigrants in Oregon

A robust study should be commissioned that addresses the cultural, social, economic, educational and linguistic demographics of Oregon’s immigrants, as well as their legal and social needs. This study should be conducted by highly trained sociologists who examine existing data sets, identify gaps in data sets, and conduct culturally and linguistically appropriate surveys using trusted community partners. Qualitative data will be critical to understanding the quantitative data—the way questions are framed, how they are asked, and who is doing the asking will greatly affect the outcomes. This study must not focus on a single issue but rather aim to better understand how immigrants interact with their com-

munities and perceive discrimination; the role that fear plays in decision-making about participating in community life and accessing legal services; and how poverty, discrimination, and lack of status affect how people access legal services. The study should also provide a comprehensive overview of the myriad ways immigrants contribute to community life and the state's economy. To do this, academics must interact not only with legal services providers but develop relationships with trusted immigrant community members and culturally specific organizations.

Now is an Opportunity to Re-Imagine Legal Services Delivery Models

Immigration legal issues don't exist in a vacuum. They are intricately bound together with other social and civil legal needs; and influenced by political, social, economic, educational, linguistic, and cultural dynamics. Immigration legal services providers, as well as legal aid organizations, must start breaking down barriers created by old brick and mortar siloed delivery models and explore new staffing models, cross-agency collaborations, co-located services, and innovative technology to provide services that are more responsive to the needs of their clients.

Oregon's four large full service immigration legal nonprofits have an incredible depth of experience and reach into immigrant communities. And despite impressive annual case numbers, they continue to primarily rely on the traditional 50-year old "legal aid" model that calls for locating the bricks and mortar "home office" in a major metropolitan area and establishing stand-alone field offices in more rural communities, while using limited funding to primarily add legal staff. Immigration legal services providers should use this COVID-19 crisis as an opportunity to intentionally pivot toward a model that up until the current crisis they have been slowly and incrementally moving toward, with limited results because of lack of capacity to effectively scale. This model can include:

COLLABORATIVE, CO-LOCATED SERVICES

Building capacity for collaborative, community-driven initiatives, such as co-located, culturally-appropriate legal services where immigrants can also access needed healthcare, family supports, education resources, citizenship classes, court accompaniment, translation services, government benefit assistance, housing assistance, and nonprofit civil legal services like those offered by OLC and LASO—in already-existing trusted, safe locations. This includes exploring relationships with social services providers and libraries to provide confidential office space on a weekly or monthly basis, with a designated computer and technology for clients to have access to legal help.

RE-STRUCTURE STAFFING MODELS

Nonprofit immigration legal services providers should consider:

- Investing in culturally and linguistically appropriate paraprofessional positions such as DOJ-accredited representatives, paralegals, outreach and community educator, and community liaison positions embedded with other nonprofits in un-served and under-served rural communities that provide other key services accessed by immigrants.
- Build capacity for outreach workers and community educators in immigrant communities to deliver more culturally and linguistically appropriate methods of delivering information to immigrant populations marginalized by distance, culture, language, income status, poor health, discrimination, fear, and lack of internet connectivity.

BUILD CAPACITY FOR RELIABLE DATA COLLECTION, REPORTING AND ASSESSMENT

Immigration legal nonprofits are woefully underfunded and lack resources to invest in coherent, robust systems for collecting, managing, and sharing case and demographic data that is critical for assessing outcomes, engaging in policy-making, and conducting successful fundraising. Such systems would ideally interface with electronic staff timecards to track times on cases, outreach, educational, and fundraising activities. Now is the time to investigate potential collaborative funding for a single data system that could be used by all providers that would not only provide for client confidentiality and the functionality discussed above, but also allow for the sharing of aggregated data to enhance cross-program collaboration.

This is an Opportunity for Oregon's Justice Actors to Invite the Immigration Legal Services Providers to the Table, and Engage in Collaborative Justice Initiatives

LASO, OLC, THE OREGON BAR, OREGON COURTS, AND CAMPAIGN FOR EQUAL JUSTICE SHOULD COMMIT TO ENGAGING WITH THE NONPROFIT IMMIGRATION LEGAL SERVICES PROVIDERS

Oregon's justice actors should explore opportunities to collaborate across the spectrum with the four large nonprofit immigration legal services providers. Although they serve many of the same immigrant populations as LASO and OLC and collaborate on some limited outreach initiatives, there is not sufficient collaboration with regard to most community outreach, client intake, or service delivery. Now is the time for LASO, OLC, and the nonprofit legal services providers to explore some bold ideas, such as opportunities for co-locating some of their legal services, especially in harder to reach rural areas like Northeastern Oregon, the Gorge, Central Oregon, Southern Oregon, and the coast. Co-locating in strategic areas with one another, as well as immigrant-related social services providers, will not only save money, but duplication of effort and make all of these services accessible to clients.

The Oregon courts, Oregon State Bar, and the Oregon Department of Justice have an opportunity to explore improved outreach and services to immigrant communities. Inviting the immigration legal services providers into discussions on policy and program initiatives focused on improving access to justice for low-income and marginalized Oregonians can provide more effective, culturally and linguistically appropriate services to these communities. Given the pressures on all the justice institutions because of the COVID-19 health crisis and the Administration's anti-immigrant policies, now is the perfect opportunity to bring Oregon's nonprofit immigration legal experts into the brain trust to ensure that policy and program measures are responsive to the needs of all Oregonians.

INVEST IN BUILDING CAPACITY FOR WELL-TRAINED COMMUNITY INTERPRETERS IN A VARIETY OF LANGUAGES

Many Indigenous/Mesoamerican communities have been in Oregon for a long time, and many of these children are tri-lingual, and now entering community colleges and universities here in the state. Courts should consider investing in initiatives that will train more Indigenous/Mesoamerican

interpreters and providing regular trainings and skill-building opportunities. For example, two years ago a two-day workshop was held in Portland for people interested in becoming Indigenous/Mesoamerican interpreters, and out of that workshop, several were trained. These kinds of initiatives, especially in rural areas, can begin to build a pool of well-trained, certified Indigenous/Mesoamerican interpreters.

Opportunities for Funders to Participate in Creating Innovative, Effective Models for Providing Legal Services to Low-Income, Rural and Indigenous/Mesoamerican Immigrants

BETTER UNDERSTANDING THE ROLE IMMIGRATION STATUS PLAYS IN ACCESS TO JUSTICE WILL PLACE MORE EMPHASIS ON APPROPRIATE FUNDING FOR LEGAL SERVICES

Simply put, immigration status is the only door through which individuals and their families can go that will lead them out of lives of unrelenting low wages, exploitation, and fear. *Other civil legal services and social services, while temporarily helpful in resolving a particular crisis or immediate problem, can never lift an immigrant out of a life in the shadows and potentially eliminate the need for those other services altogether.*

Funders, **including and especially the State of Oregon**, should consider creating a hierarchy of philanthropic investments in immigration nonprofits as a whole (e.g., affirmative, proactive legal services are given the highest priority for funding), but also consider restructuring how they make these investments.

Oregon is fortunate to have four well-established nonprofit immigration legal services providers that *each* have over 30 years of experience providing a wide range of high level, sophisticated, affirmative and defensive legal services to Oregon immigrants. These four organizations alone, with over 150 years of collective experience, provide over 10,000 Oregon immigrants annually with culturally and linguistically appropriate legal services, and provide outreach and education to tens of thousands more. It is now more important than ever for funders reach out to these and other nonprofit immigration legal services providers, through a Zoom call if circumstances require it, to tap into that collective expertise and dig deep for an understanding of the challenges, drivers, data, and metrics in providing these services.

THE NEW IMMIGRATION POLICIES UNDER THE TRUMP ADMINISTRATION MAKE IT MORE IMPERATIVE THAN EVER TO FOCUS ON OPERATING SUPPORT

As this report demonstrates, in just the past three years, the practice of immigration law has been turned on its head, demanding an exponential increase in staff time for a single, formerly simple, visa case. Coupled with increased ICE enforcement, growing numbers of Indigenous/Mesoamerican immigrants with language and cultural differences, and the challenges of serving rural communities, nonprofit legal services providers—stretched in the best of times—now more than ever need essential operating support to serve their clients. Rather than forcing legal services providers to spend precious resources chasing new ways to provide services and programs, by focusing on the following, funders can dramatically increase the capacity of nonprofit legal services' providers to serve their marginalized clients:



Funders, **including and especially the State of Oregon**, should consider creating a hierarchy of philanthropic investments in immigration nonprofits as a whole, but also consider restructuring how they make these investments.

- **Staff Positions.** Building trust with marginalized, non-English speaking communities in rural immigrant communities is labor and time intensive and is not accomplished through traditional Western methods; nor can it be assessed using standard performance-driven tools. Study participants unanimously reported that they could greatly increase their effectiveness in reaching these communities if they had designated staff positions focused on building relationships with these communities. Funding for community outreach liaison and education positions, paralegal, and DOJ-accredited representatives—especially those located in rural areas staffed by culturally and linguistically competent individuals—can build long lasting infrastructure for bringing *Know Your Rights* education and legal services to immigrants. Likewise, funding for additional attorney positions to supervise paralegals and DOJ representatives can free up costly attorney time to focus on more complex legal matters.
- **Salaries** in these nonprofits are already at rock bottom, and they try to provide basic medical and dental benefits. In addition to those costs, professional liability insurance, bar dues, and required professional education training easily runs an additional \$20,000 per year for each of the nonprofits.
- **Ancillary Costs—Transportation, Outreach Materials, Technology, Document Translation, Interpreter Services.** Immigration legal services come with tremendous additional costs. In addition to staff time, a single straightforward-seeming affirmative case may require document retrieval and collection from a foreign country (with mailing, search, and copying costs); translation of all documents, including birth, death, marriage and others; reliance on “snail mail” to get documents to USCIS, with attendant postage costs; and the use of interpreters, which are required for interviews and developing affidavits and other documents for most Indigenous/Mesoamerican-language speaking clients. There are also service fees, travel, and parking costs for immigration court appearances. Additional costs include printing and translation costs for educational materials; thousands of dollars for equipment and IT upgrades that allow them to maintain communications with clients who cannot travel great distances; and room, equipment, and copying costs payable to third-party collaborative community partners that provide safe spaces for clients to meet either in person or virtually with a nonprofit lawyer.

- **Funding for Visas.** As all nonprofits reported, visa costs have proven to be an increasingly significant barrier to immigrants following through with a potentially successful case. Not only do they struggle to pay the low attorney fees charged by the nonprofit legal services providers, but the Administration’s hike on visa application fees—which may double in the next year—have proven too expensive for most immigrants wishing to protect their family members.
- **Capacity-Building is Critical.** Funders should focus on helping immigration legal services providers build capacity for collaborative, community-driven initiatives, mentioned above, such as co-located, culturally-appropriate services where immigrants can access needed immigration, healthcare, counseling, education, government benefit assistance, housing assistance, family supports, and legal services in one trusted, safe location.
- **Funding for Case Management and Data Collection Capability.** The legal nonprofits currently use inexpensive case management systems that are not at all equipped to collect, manage, and report robust data. Sophisticated data collection and sharing systems like those used by LASO and the Oregon Law Center would allow the legal nonprofits to build capacity for collecting data (both qualitative and quantitative) that will provide funders and the providers alike with robust information on barriers to access to justice and the methodologies and interventions that are most effective in reducing such barriers.
- **Create Community Bridges to Build Capacity for Collaborative Initiatives.** Currently, funding for immigration legal services is lumped in with all other social services providers. Existing philanthropy models have limited or vague transparency about available funding and grantmaking priorities and tend to focus on new programs and initiatives—all of which contributes to a competitive rather than collaborative approach by grantees.

Oregon’s philanthropic community has an opportunity to create a dynamic culture of collaboration among immigration legal services providers and rural immigrant social services organizations.

Oregon’s philanthropic community has an opportunity to create a dynamic culture of collaboration among immigration legal services providers and rural immigrant social services organizations. Funders have huge rolodexes of grantees that provide social, educational, medical, and other needed services to immigrant communities. Funders should consider calling a virtual summit for diverse, trusted immigrant community providers in targeted rural areas, along with the legal services providers, to confirm priorities and brainstorm potential collaborations. Immigrant social, educational, and medical services providers can benefit from exploring potential partnerships with legal services providers that will increase all providers’ capacities to enhance culturally and linguistically appropriate services to their clients in safe, trusted spaces. Creating a facilitated space for grantees to explore potential collaborative initiatives can expand current nascent initiatives such as space and technology sharing and co-located services. Such endeavors cut down on competition between service providers for a single tranche of funding for their own specific purposes and foster a new culture of collaborative thinking when seeking funding.

Appendix A

References

- Amuedo-Dorantes, C., & Antman, F. (2016). *Can authorization reduce poverty among undocumented immigrants? Evidence from the Deferred Action for Childhood Arrivals program*. *Economic Letters* 147, 1-4. <http://dx.doi.org/10.1016/j.econlet.2016.08.001> (accessed July 30, 2020)
- Census Report Reveals Language Trends in Northwest Homes*, Oregon Public Broadcasting, Northwest News Network, August 8, 2013. <https://www.opb.org/news/article/npr-census-report-reveals-language-trends-in-northwest-homes/> (accessed May 28, 2020)
- Detaining Families, A Study of Asylum Adjudication in Family Detention*, American Immigration Council Special Report August 2018.
- Experiencing English*, East Oregonian, September 21, 2018, by Jayati Ramakrishnan https://www.eastoregonian.com/news/local/experiencing-english/article_524f886d-96ed-547f-95cc-31f02b62e183.html (accessed June 1, 2020)
- Farmworker Justice Report*
<https://www.farmworkerjustice.org/sites/default/files/documents/7.2.a.6%20fwj.pdf> (accessed June 16, 2020)
- Federal Poverty Income Guidelines Oregon—200%
<https://www.oregon.gov/ohcs/Pages/weatherization-oregon-income-guidelines.aspx> (accessed July 2, 2020)
- Final Report to the Oregon Law Foundation on the Legal Needs of Impoverished Oregonians*, December 2018, Department of Sociology, Portland State University, Aaron Roussell, PhD, Amanda Hendrix, MA.
- Human Trafficking in Oregon: A Report of the Oregon Advisory Committee to the U.S. Commission on Civil Rights*, February 2018.
- Institute on Taxation and Economic Policy, *Undocumented Immigrants State & Local Tax Contributions*, March, 2017. <https://itep.org/wp-content/uploads/ITEP-2017-Undocumented-Immigrants-State-and-Local-Contributions.pdf> (accessed June 17, 2020)
- Latinos in Oregon: Trends and Opportunities in a Changing State*, Latino Partnership Program and Oregon Community Foundation, August, 2016 (David Keyes, Roberto Franco, Caitlin Ruffenach, Sonia Worcel).
- Lisa R. Pruitt, Amanda L. Kool, Lauren Sudeall, Michele Statz, Danielle M. Conway, & Hannah Haksgaard, *Legal Deserts: A Multi-State Perspective on Rural Access to Justice*, 13 *Harv. L. & Pol'y Rev.* 15 (2018).
- Migration Policy Institute: Oregon
<https://www.migrationpolicy.org/data/state-profiles/state/demographics/OR>; <https://www.migrationpolicy.org/programs/data-hub/charts/children-immigrant-families?width=1000&height=850&iframe=true>; <https://www.migrationpolicy.org/data/state-profiles/state/demographics/OR> (accessed May 30, 2020)
- National Center for Children in Poverty
http://www.nccp.org/profiles/OR_profile_6.html (accessed July 8, 2020)
- New American Economy Research Fund, *Overcoming the Odds: The Contributions of DACA—Eligible Immigrants and TPS Holders to the U.S. Economy*. <https://research.newamericaneconomy.org/report/overcoming-the-odds-the-contributions-of-daca-eligible-immigrants-and-tps-holders-to-the-u-s-economy/> (accessed July 30, 2020)
- New American Economy Research Fund, *Contributions of New Americans in Oregon*, August 3, 2016. <https://research.newamericaneconomy.org/report/the-contributions-of-new-americans-in-oregon/> (accessed June 17, 2020)
- Oregon Advocacy Commissions Office
<https://www.oregon.gov/OAC/Pages/index.aspx> (accessed July 22, 2020)
- Oregon Bureau of Labor and Industries Farm & Forestry Labor Contractors
<https://www.oregon.gov/boli/WHD/LC/Pages/ActiveLaborContractors.aspx> (accessed May 14, 2020)
- Oregon Employment Department, MSFW Advocate Office, H2A Job Orders through June 2020.
- Oregon Law Center, *Statewide OJD Indigenous Language Requests for Calendar Year 2018, 2018 Indigenous Requests by County*.
- Oregon Judicial Department Court Language Access Services Report 2018
<https://www.courts.oregon.gov/programs/interpreters/news/Annual%20Reports/2018%20CLAS%20Annual%20Report.pdf> (accessed May 20, 2020)
- Oregon MSFW 2017-2018 LEARS Replacement Data report to the U.S. Department of Labor.

OR-OSHA Registered Labor Camps

http://actprod.cbs.state.or.us/iportal/report_catalog.html (accessed 5/14/20)

Oregon Department of Education—2018-2019 Oregon Statewide Report Card

<https://files.eric.ed.gov/fulltext/ED605053.pdf> (accessed June 28, 2020)

Oregon Department of Education Consolidated State Performance Report: Parts I And II For State Formula Grant Programs Under The Elementary And Secondary Education Act As amended in 2001 For reporting on School Year 2015-16

<https://www2.ed.gov/admins/lead/account/consolidated/sy15-16part2/or.pdf> (accessed June 28, 2020)

Oregon Department of Education Fall Membership Report 2019-2020

<https://www.oregon.gov/ode/reports-and-data/students/Pages/Student-Enrollment-Reports.aspx> (accessed May 19, 2020)

Oregon by the Numbers, Key Measures for Oregon and Its Counties, 2018 Edition, Oregon State University Extension Service and the Ford Family Foundation

https://oregonexplorer.info/sites/default/files/OregonByTheNumbers2018.pdf#overlay-context=content/oregon-the-numbers-key-measures-oregon-and-its-counties-2018%3Ftopic%3D173%26topic%3D140%26qt-subtopic_quicktab%3D5 (accessed July 16, 2020)

Oregon Law Foundation, “*Oregon’s Legal Immigration Services Social Economic Impact and Return of Funding Investment Analysis for the Year 2018*”.

Pope, N.G. (2016). *The Effects of DACAmentation: The Impact of Deferred Action for Childhood Arrivals on Unauthorized Immigrants*.

Journal of Public Economics, 143, 98- 114. <http://dx.doi.org/10.1016/j.jpubeco.2016.08.014> (accessed July 30, 2020)

Portland State University Oregon Annual Population Report

<http://www.pdx.edu/prc/annual-oregon-population-report> (accessed May 15, 2020)

Som Subedi, *Access and Partnership: What Immigrants and Refugees Need During the Covid 19 Crisis*, Street Roots Digital Edition, April 22, 2020.

<https://news.streetroots.org/2020/04/22/access-and-partnership-what-immigrants-and-refugees-need-during-covid-19-crisis> (accessed June 22, 2020)

The Hidden Impact of Removal Proceedings on Rural Communities. <https://trac.syr.edu/immigration/reports/602/> (accessed July 2, 2020)

Tracking Oregon’s Progress, Latinos in Oregon, Trends and Opportunities in a Changing State, The Oregon Community Foundation, Latino Partnership

Program, August 2016. https://oregoncf.org/assets/PDFs-and-Docs/PDFs/latinos_in_oregon_report_2016.pdf (accessed May 2, 2020)

TRAC Data

<http://trac.syr.edu/immigration/reports/491/> (numbers of immigration cases in Oregon)

<http://trac.syr.edu/phptools/immigration/arrest/> (ICE arrests)

https://trac.syr.edu/phptools/immigration/court_backlog/deport_outcome_charge.php (deportation case outcomes)

<http://trac.syr.edu/phptools/immigration/addressrep/> (legal representation deportation case geographical areas of Oregon)

<https://trac.syr.edu/immigration/reports/602/>

<https://trac.syr.edu/immigration/reports/612/> (Covid impact)

<https://trac.syr.edu/phptools/immigration/juvenile/> (children under 18)

<https://trac.syr.edu/immigration/reports/590/> (asylum case denials by court/judge)

<https://trac.syr.edu/immigration/reports/579/> (pending caseloads)

<https://trac.syr.edu/immigration/reports/562/> (released families and immigration court hearings)

<http://www.trac.syr.edu/phptools/immigration/nta/> (notices to appear)

<https://trac.syr.edu/phptools/immigration/asylum/> (asylum cases in Oregon)

(accessed May 20-July 2, 2020)

Understanding the Immigrant Experience in Oregon, Research, Analysis and Recommendations from University of Oregon Scholars,

2008. Edited by Robert Bussel, contributing authors: Michael Aguilera, J. Mark Eddy, Justyna Goworowskay, Susan Hardwick,

Ken Kato, Mauricio Magana, Charles Martinez, Jr., Heather McClure, Marcela Mendoza, Lara Skinner, Lynn Stephen

U.S. Census Bureau

<https://www.census.gov/quickfacts/> (oregon census facts)

<https://data.census.gov/cedsci/profile?g=0400000US41&hidePreview=true&tid=ACSDP1Y2018.DP02> (Oregon by counties maps)

<https://data.census.gov/cedsci/profile?g=0400000US41&q=Oregon;> (Oregon data)

<https://data.census.gov/cedsci/profile?g=0400000US41&hidePreview=true&tid=ACSDP1Y2018.DP02> (Oregon census data/county)

<https://www.census.gov/library/visualizations/interactive/people-that-speak-english-less-than-very-well.html>;

<https://www.migrationpolicy.org/data/state-profiles/state/language/OR/> (Oregon language data)

(accessed April 28–May 30, 2020)

U.S. Department of Homeland Security: Refugees in Oregon

<https://www.oregon.gov/DHS/ASSISTANCE/REFUGEE/Pages/data.aspx>; DOS REFUGEE ARRIVALS MAP—in file (July 5, 2020)

<https://www.wrapsnet.org/documents/Arrivals%20by%20State%20Map%205-5-20.pdf>

U.S. Department of Homeland Security Enforcement Actions 2018

https://www.dhs.gov/sites/default/files/publications/immigration-statistics/yearbook/2018/enforcement_actions_2018.pdf (accessed May 27, 2020)

U.S. Department of Homeland Security Reports—Immigrants determined inadmissible by field office. (accessed July 5, 2020)

<https://www.dhs.gov/immigration-statistics/yearbook/2018/table38>

<https://www.justice.gov/eoir/page/file/942306/download#OREGON> (accessed May 26, 2020)

U.S. Department of Justice Accredited Representative Roster Department of Homeland Security

<https://www.dhs.gov/immigration-statistics/readingroom/LPR/LPRcounty> (LPRs 2018 by state and nationality) (accessed July 25, 2020)

U.S. Department of Justice Recognized Organizations and Accredited Representatives Roster by State and City Report Last Updated on: 06/08/20

<https://www.justice.gov/eoir/page/file/942306/download#OREGON> (accessed July 2, 2020)

U.S. Department of Justice Executive Office for Immigration Review

<https://www.justice.gov/eoir> (accessed July 15, 2020)

U.S. Department of Labor Significant MSFW States

https://www.dol.gov/sites/dolgov/files/ETA/mas/pdfs/Significant_MSFW_States_and_Local_Offices_PY_2017.pdf (accessed June 16, 2020)

Appendix B

Acknowledgements

ICS and LexTerra Strategies would like to thank the Immigrant and Refugee Funders' Collaborative for its generous support for this study and all those who participated in the online statewide survey. ICS also would like to specially acknowledge the following individuals and organizations who generously devoted their time and resources to providing information and insights for this report. We apologize to anyone we inadvertently left off this list:

APANO

Duncan Hwang

Catholic Charities

Immigration

Legal Services

Lakota Bowen

John Herrera

Kat Kelley

Sarah Purce

Central Oregon Latino Community Association

Oscar Gonzalez

Brad Porterfield

Ecumenical Ministries of Oregon—SOAR

Immigration

Legal Services

Caroline Van der Harten

Immigration Counseling Service (ICS)

Isaac Alley

Frank Garcia

Phil Hornik

Juan Mayoral

Nicole Nelson

Adriana Vaca

Innovation Law Lab

Benjamin Grass

Legal Aid Services of Oregon

Laurie Hoefer

Heather Kemper

Andrea Malone

Janice Morgan

Angelica Vega

Lutheran Community Services NW Immigration Legal Services

Alma Jean

Mexican Consulate

Metropolitan Public Defender

Samantha Ratcliffe

Oregon Farmworker Advocate's Office

Fernando Gutierrez

Oregon Justice Resource Center

JJ Rollin

Oregon Law Center

Kathleen Dolan

Monica Goracke

Ami Nishiguchi

Julie Samples

Oregon Law Foundation

Judith Baker

Bill Penn

Oregon Public Defenders

Brandon Mills

Eugene Thompson

Jamie Pruitt

Kathryn Griffin

Kevin Hupy

Kristina Kayl

Oregon Public Defense Services

Lane Borg

Kaysea Dahlstrom

Eric Deitrick

Keren Farkas

Portland State University College of Liberal Arts and Sciences, Department of Sociology

Dr. Aaron Roussel

Gisela Rodriguez-Fernandez

Dr. Debi Elliott

Portland State University College of Urban and Public Affairs: Population Research Center

Charles Rynerson

Portland State University School of Social Work

Dr. Roberto Orellana

Somos Hispanas Unidas

Fernando Ghio

Steinkopf Strategies

Deborah Steinkopf

TsaiComms

Lillian Tsai

Victim Rights Law Center

Margaret Davis

Waxler & Le Immigration Law, LLC

Individuals

Yasmin Al Kashef

Lise Colgan

Sandra Echavarria

Daniel Franco-Nuñez

Clarice Freitas

Danna Garcia

Nancy Greenman

Ridu Haraj

Anabel Hernandez

Jesus Hernandez

Jackie Leung

Bertilda Martín

Cecilia Mihaylo

Alita Pavani

Sue Nell Phillips

Emiliana Aguilar Reynoso

Som Subedi

Michael Taus

Lia Taus

Graphic Design

Alissa Beddow

Appendix C

Methodology

Data were gathered and analyzed from a multitude of sources for this report. In order to provide context to this data, we relied on statistical reports from a wide variety of sources, including immigration legal services providers and public defenders. We also relied on numerous studies, including the 2018 Oregon State Bar Civil Legal Needs Study. In addition, we conducted a statewide online survey, individual interviews with 14 stakeholders and shorter informal interviews with several others, including researchers, public defenders, immigration lawyers and immigrants; and three focus groups with immigrants and those who work with immigrants in the six targeted geographic areas.

The qualitative data, including interviews, focus groups, and statewide survey, are meant to add depth, meaning, and context to the quantitative data. Despite limitations placed on us due to the COVID-19 health crisis, we tried to include a large cross-section of those with direct experience in the immigrant communities in the six targeted geographic areas.

SURVEY

An online survey was sent to 325 individuals who were immigrants, organizations working with immigrants in the six identified geographic areas of Oregon (including educators, government employees, lawyers, health care providers, and social services agencies); with an 18% response rate. 100% of respondents reported being either fully or partially involved in delivering services to, or working with, members of immigrant communities in 2019.

LIMITATIONS

As noted in the introduction, the funding for this study was limited, and this was not a scientific study. Rather, this report is intended to build upon the information and findings in the *2018 Oregon Legal Needs Report* to delve deeper into issues highlighted in that report, which will hopefully provide the basis for a well-funded, robust future study of Oregon's immigrants and their contributions to the state.

As with any data sets and information-gathering, there are numerous limitations, which include: Because of the coronavirus restrictions, it was impossible to interview immigrants in person in their own surroundings where they felt most safe and comfortable; interviews and focus groups were limited in number; interviews, focus groups and surveys were not randomized; and individual implicit biases (of both the interviewer and the interviewee) must be taken into consideration. The existing U.S. census and Oregon data on numbers and characteristics of undocumented immigrants is flawed for numerous reasons, including but not limited to cultural, logistic and linguistic limitations, and is therefore based on estimates that are not completely reliable; there is a pronounced lack of coordination, consistency and collaboration in the collection, reporting and sharing of demographic and legal case data on immigrants between nonprofit legal services, social services organizations, government agencies, and educational institutions. The report relied on self-reported case data and it was not cross-checked for accuracy; although attempts were made to verify information and data, there may be reporting errors. Finally, the author is not a social scientist nor completely independent of the issues or organizations mentioned in this report. The author has served as a former executive director of ICS, as a board member of Legal Aid Services of Oregon and the Oregon Law Center, has worked with many agencies and individuals mentioned, and has been involved in numerous immigration, immigrant, and farmworker-related issues over the past 30-plus years.

All of these factors contribute to a less than full picture of immigrants in Oregon and their legal needs. Despite these limitations, however, this report attempts to provide a unique snapshot of the immigration legal challenges Oregon's rural immigrants face in 2019 and recommendations for meeting those challenges.

About the Survey Respondents—Where They Work, Services They Provide and Location of Services

Table 1. Where respondents worked

EMPLOYER	
Nonprofit agency	46%
Own business (consulting, interpreter, etc.)	18%
Government agency or tribal office	8%
Educational institution	6%
Community volunteer	6%
Other private business	6%
Medical service	2%

Table 2. Time respondent’s organization, business, or agency has worked with immigrants

DURATION	
20+ years	67%
15-20 years	8%
10-15 years	6%
5-10 years	8%
Under 5 years	10%

Table 3. Respondents’ time working with immigrants

DURATION	
20+ years	38%
15-20 years	10%
10-15 years	17%
5-10 years	21%
Under 5 years	15%

Table 4. Counties where respondents’ offices are physically located

COUNTY	
Deschutes	19%
Multnomah	15%
Marion	13%
Jackson	13%
Lane	10%
Washington	8%
Umatilla	6%
Benton	4%
Clackamas	4%
Clatsop	4%
Lincoln	2%
Linn	2%

100% of respondents reported that either they or their organization, business or agency was involved either fully or partially in delivering services to, or working with, members of immigrant communities in 2019.

67% of respondents reported that their organization, business or agency has worked with immigrants in their community for over **20 years.**

Total number of clients that respondents served in 2019
252,372

Total number of those clients who were immigrants
82,791 (33%)

Table 5. All counties where respondents provided services in 2019 (% rounded to nearest 10th)

COUNTY	
Baker	12%
Benton	24%
Clackamas	32%
Clatsop	20%
Columbia	18%
Coos	14%
Crook	28%
Curry	16%
Deschutes	30%
Douglas	16%
Gilliam	12%
Grant	10%
Harney	10%
Hood River	22%
Jackson	26%
Jefferson	34%
Josephine	22%
Klamath	22%
Lake	12%
Lane	30%
Lincoln	22%
Linn	34%
Malheur	10%
Marion	36%
Morrow	16%
Multnomah	40%
Polk	22%
Sherman	14%
Tillamook	18%
Umatilla	20%
Union	12%
Wallowa	8%
Wheeler	10%
Yamhill	22%

Table 6. Regional demographics, NE Oregon

NE OREGON	Morrow	Umatilla	Union
% of County Population Foreign Born	17%	11%	4%
<i>Language Other than English Spoken at Home</i>	34%	23%	5%
<i>Speak English Less than Very Well</i>	15%	11%	2%
% of Total Households with Income Under \$50,000/year	35%	48%	48%
Percent of Total Households Below Poverty Level	16%	18%	16%
Percent of Total Children Under 18 in Poverty	23%	27%	19%
Avg. % of Latino Enrollment in County Public School Districts K-12	42%	28%	7%

Table 7. Regional demographics, Columbia Gorge

COLUMBIA GORGE	Gilliam	Hood River	Wasco
% of County Population Foreign Born	2%	16%	8%
<i>Language Other than English Spoken at Home</i>	5%	28%	15%
<i>Speak English Less than Very Well</i>	3%	15%	6%
% of Total Households with Income Under \$50,000/year	30%	39%	49%
Percent of Total Households Below Poverty Level	11%	10%	13%
Percent of Total Children Under 18 in Poverty	4%	12%	17%
Avg. % of Latino Enrollment in County Public School Districts K-12	25%	42%	18%

Table 8. Regional demographics, Central Oregon

CENTRAL OREGON	Deschutes	Jefferson	Crook
% of County Population Foreign Born	5%	6%	3%
<i>Language Other than English Spoken at Home</i>	7%	16%	6%
<i>Speak English Less than Very Well</i>	2%	5%	1%
% of Total Households with Income Under \$50,000/year	40%	49%	51%
Percent of Total Households Below Poverty Level	11%	20%	15%
Percent of Total Children Under 18 in Poverty	14%	26%	23%
Avg. % of Latino Enrollment in County Public School Districts K-12	10%	19%	15%

Table 9. Regional demographics, Southern Oregon

SOUTHERN OREGON	Jackson	Josephine	Klamath
% of County Population Foreign Born	6%	4%	5%
<i>Language Other than English Spoken at Home</i>	10%	5%	8%
<i>Speak English Less than Very Well</i>	4%	1%	3%
% of Total Households with Income Under \$50,000/year	47%	57%	57%
Percent of Total Households Below Poverty Level	16%	19%	20%
Percent of Total Children Under 18 in Poverty	22%	27%	28%
Avg. % of Latino Enrollment in County Public School Districts K-12	15%	13%	43%

Table 10. Regional demographics, Mid-Willamette Valley

MID-WILLAMETTE VALLEY	Benton	Linn	Lane
% of County Population Foreign Born	10%	5%	6%
<i>Language Other than English Spoken at Home</i>	14%	8%	9%
<i>Speak English Less than Very Well</i>	5%	2%	3%
% of Total Households with Income Under \$50,000/year	45%	48%	50%
Percent of Total Households Below Poverty Level	19%	14%	19%
Percent of Total Children Under 18 in Poverty	13%	18%	21%
Avg. % of Latino Enrollment in County Public School Districts K-12	15%	12%	9%

Table 11. Regional demographics, North Willamette Valley

NORTH WILLAMETTE VALLEY	Marion	Polk	Yamhill
% of County Population Foreign Born	13%	8%	9%
<i>Language Other than English Spoken at Home</i>	25%	14%	15%
<i>Speak English Less than Very Well</i>	10%	5%	5%
% of Total Households with Income Under \$50,000/year	45%	43%	42%
Percent of Total Households Below Poverty Level	15%	14%	14%
Percent of Total Children Under 18 in Poverty	21%	15%	20%
Avg. % of Latino Enrollment in County Public School Districts K-12	33%	15%	20%

Table 12. Regional demographics, Oregon Coast

OREGON COAST	Clatsop	Lincoln	Tillamook
% of County Population Foreign Born	5%	5%	5%
<i>Language Other than English Spoken at Home</i>	9%	7%	8%
<i>Speak English Less than Very Well</i>	3%	2%	3%
% of Total Households with Income Under \$50,000/year	48%	55%	51%
Percent of Total Households Below Poverty Level	11%	17%	15%
Percent of Total Children Under 18 in Poverty	9%	26%	23%
Avg. % of Latino Enrollment in County Public School Districts K-12	16%	23%	16%

Table 13. Languages spoken by respondents’ clients

LANGUAGE	%
English	71%
Spanish	94%
Central American Indigenous/Mesoamerican	50%
Other Indo-European	8%
All African	6%
African Indigenous	6%
All Asian	19%
Asian Indigenous	4%
All Pacific Islands	4%
Pacific Islands Indigenous	6%

Table 14. Central American Indigenous/Mesoamerican languages spoken by respondents’ clients

LANGUAGE	%
Chuj	6%
Huastecan Languages	12%
Kanjobal-Chujean	24%
Maya	41%
Miskito	6%
Mixteco	68%
Nahuatl	47%
Otomi	12%
Purpecha	6%
Quiché-Mamean	41%
Triqui	3%
Tarasco	3%
Tzeltal	9%
Tzotzil	9%
Yucatecan	9%
Zapoteco	59%

Table 15. All types of services respondents provided in 2019 to immigrant clients

SERVICE	
Access to social, medical, educational, government services (provided access or navigational assistance but not the services themselves)	48%
Addiction services	4%
Child care/relief nursery	10%
Child welfare issues (foster children, vulnerable youth, juvenile issues)	13%
Consumer issues	13%
Court access (assistance with any local, state or federal court proceedings)	38%
Criminal justice assistance (legal or other)	25%
Disabilities services	17%
Domestic violence (shelter, counseling, support)	25%
Drivers' licenses (includes assistance with procedures)	19%
Education, any education-related services, including teaching	42%
Elder issues, including elder protection, elder care	15%
Employment related (placement, career counseling, etc.)	31%
Family and parenting support	23%
Food, or food access-related services	42%
Government benefits related	19%
Housing, any housing assistance or help with housing issues	42%
Immigration related community education and advocacy	46%
Immigration related legal services	35%
Immigration proceedings support (help for persons specifically in proceedings, such as accompaniment, emotional, financial, transportation and logistics, navigation to legal services, etc.)	33%
Law enforcement (assistance with issues related to access to, or discrimination by)	19%
Legal services (non-immigration-related)	33%
Medical (including any health-related services)	27%
Mental Health (counseling, support, etc.)	21%
Native American/Tribal/ICWA issues	2%
Private business (retail, real estate, banking, restaurant, etc.)	4%
Translation and interpretation	60%
Transportation assistance	21%
Utilities assistance	15%
Veterans assistance	2%
Victim assistance (including VAWA)	13%
Dental, ITINS, advocacy	2%
Citizenship preparation	2%
Consular services	2%
Help navigating and seeking resources	2%
Small business support and organic gardening	2%

Table 16. Top most trusted community members ranked from most trusted to not at all trusted

	Not at All Trusted	Somewhat Trusted	Trusted	Very Trusted	Most Trusted
Clergy	2%	20%	23%	48%	7%
Court staff	36%	44%	16%	2%	2%
Culturally-specific individual community members or volunteers	0%	4%	24%	46%	26%
Educational service providers	0%	13%	49%	31%	7%
Employers	16%	57%	20%	4%	2%
Family members	0%	2%	13%	39%	46%
Government agency workers	33%	56%	10%	0%	0%
Interpreters	2%	32%	34%	25%	7%
Lawyers and/or judges	11%	43%	34%	7%	5%
Law enforcement	51%	31%	16%	0%	2%
Medical service providers	2%	16%	47%	30%	4%
Nonprofit social services providers general to the community	0%	30%	47%	19%	5%
Nonprofit immigrant/culturally-specific social services providers	0%	9%	20%	53%	18%

Table 17. How immigrants in respondents’ communities access information to answer their immigration or legal questions, ranked by order of importance of the access route

	Not at All Important	Somewhat Important	Important	Very Important	Most Important
Clergy	14%	31%	33%	17%	5%
Court staff	31%	33%	21%	5%	10%
Culturally-specific individual community members or volunteers	0%	15%	13%	48%	24%
Educational service providers	14%	21%	28%	33%	4%
Employers	26%	44%	21%	5%	5%
Family members	0%	7%	31%	42%	20%
Government agency workers	18%	41%	23%	16%	2%
Interpreters	20%	24%	20%	22%	9%
Lawyers and/or judges	14%	20%	34%	20%	11%
Law enforcement	52%	32%	11%	0%	5%
Libraries or library staff	37%	34%	15%	12%	2%
Medical services providers	27%	29%	24%	17%	20%
Nonprofit social services providers general to the community	2%	32%	36%	23%	7%
Nonprofit immigrant/culturally-specific social services providers	0%	7%	25%	39%	32%

Table 18. The most effective methods to reach immigrants in respondents’ communities to advise them of their rights, and/or how to access free and low cost legal services

	Not at All Effective	Somewhat Effective	Effective	Very Effective	Most Effective
Radio	2%	13%	20%	38%	28%
Television	7%	15%	29%	24%	24%
Flyers	4%	27%	24%	34%	10%
Cell phone calls/messages	4%	17%	24%	32%	22%
Text messages	4%	20%	15%	44%	17%
Apps	24%	24%	24%	16%	11%
Social media dities	2%	12%	15%	34%	37%
Websites	25%	23%	20%	23%	10%
<i>Know Your Rights</i> seminars conducted in trusted community locations	0%	5%	24%	43%	32%
Clergy	7%	7%	44%	32%	10%
Court staff	35%	33%	25%	7%	0%
Culturally-specific individual community members or volunteers	0%	4%	16%	33%	45%
Educational services providers	7%	9%	22%	46%	15%
Employers	30%	30%	2%	13%	7%
Family members	0%	4%	23%	34%	40%
Government agency workers	24%	33%	26%	10%	7%
Interpreters	19%	21%	16%	33%	12%
Lawyers and/or judges	24%	16%	26%	26%	8%
Law enforcement	40%	20%	28%	7%	5%
Medical services providers	15%	24%	32%	22%	7%
Nonprofit social services providers general to the community	2%	17%	24%	38%	19%
Nonprofit immigrant/culturally specific nonprofit social service providers	0%	7%	14%	27%	52%

Table 19. Gaps in and barriers to legal services: What rural community members, immigrants, interpreters, educators, and social services providers say about challenges rural immigrants have accessing free or low cost immigration legal services

	Not at All Important	Somewhat Important	Important	Very Important	Most Important
Cost/fear of cost	0%	6%	17%	23%	53%
Cultural issues	5%	28%	23%	35%	13%
Distance	11%	20%	20%	32%	16%
Do not trust the legal system, lawyers or legal services providers	6%	38%	27%	18%	11%
Home obligations/schedule/lack of childcare, etc.	9%	9%	42%	24%	16%
Lack of time to pursue/access legal services	7%	20%	38%	22%	13%
Lack of transportation (high cost, no reliable transport)	4%	32%	19%	26%	19%
Lack of knowledge about their rights	0%	9%	20%	42%	29%
Lack of knowledge about existing services	2%	2%	26%	43%	28%
Lack of knowledge about how or where to access services	0%	6%	23%	38%	32%
Language	4%	13%	24%	31%	27%
Fear of discrimination	6%	13%	44%	18%	20%
Fear of domestic partner, family member or spouse	13%	22%	33%	9%	22%
Fear of ICE	9%	11%	11%	28%	43%
Fear of police and/or arrest	9%	16%	20%	27%	29%
Fear that employer or another will report them to immigration	9%	11%	27%	24%	29%
Work obligations/schedule	2%	9%	24%	36%	29%

Table 20. Importance of immigration legal needs respondents were aware of in their communities or that immigrants reported to them in 2019

	Total	Very Important	Most Important
Criminal violations effect on immigration status	61%	35%	26%
DACA	71%	31%	40%
Deportation proceedings (individual or family member involved in)	73%	30%	43%
Family separation at U.S. border	41%	24%	17%
Government benefits (how receipt of or application for affect immigration status)	61%	28%	33%
H2A or H2B Farmworker/Forestry Worker issues	37%	27%	10%
ICE arrest, or fear of	69%	17%	52%
Immigration status of individual or family member (obtaining, adjusting, qualifying, etc.)	72%	22%	50%
Lost/need replacement or renewal of papers	48%	32%	16%
Victim of crime status	54%	33%	21%
Victim of trafficking status	41%	28%	13%
VAWA (Violence Against Women Act) status	55%	22%	33%
Work authorization	78%	30%	48%

Survey questions related to immigration legal needs and immigration related legal needs attempted to track as closely as possible those in the 2018 Oregon Legal Needs Report, for consistency.

Table 21. Other immigration-related legal needs of immigrants in respondents' communities ranked by order of importance

	Total	Very Important	Most Important
Afraid to go to work, school, medical provider, or store because of ICE	62%	31%	31%
Afraid to complain to a landlord or employer because of ICE	67%	28%	39%
Afraid to call police or go to court because of ICE	77%	29%	48%
Afraid to ask for or receive government benefits because of ICE	77%	32%	45%
Denied (or could not) access an attorney or interpreter while involved in a removal proceeding	36%	16%	20%
Detained or deported by immigration authorities	55%	24%	31%
Discriminated against by a landlord, medical provider, community member, store, or school because of language ability	59%	37%	22%
Discriminated against by a landlord, medical provider, community member, store, or school because of skin color	53%	30%	23%
Discriminated against by a landlord, medical provider, community member, store, or school because of immigration status	49%	27%	22%
Fired from job because of lack of proper papers	49%	22%	27%
Given bad immigration advice by a notario or someone other than a lawyer	49%	27%	22%
Needed to plan for care of children or family member due to fear of being held or deported by ICE	66%	21%	45%
Problems related to not having a driver's license	78%	23%	55%
Problems related to not having a Social Security Number (SSN), or getting or renewing an Individual Taxpayer Identification Number (ITIN)	76%	26%	50%

Survey questions related to immigration legal needs and immigration related legal needs attempted to track as closely as possible those in the 2018 Oregon Legal Needs Report, for consistency.

Table 22. Nonprofits exclusively devoted to providing a range of proactive and defensive immigration legal services

AGENCY	Staffing in 2019	Total Cases Closed in 2019	% Served Outside Portland Tri-County Area
Immigration Counseling Service (ICS)	Portland Office 3 staff lawyers 1 supervising EC lawyer 1 DOJ-accredited rep 1 paralegal 1 intake/receptionist	1,142	31%
	UAC Program 2 UAC lawyers 1 UAC paralegal		
	Hood River Office 1 intake/receptionist 1 lawyer		
	Redmond Mobile Clinic 1 staff lawyer/month	120	100%
	Albany Mobile Clinic 1 staff lawyer/month	120 (for 2020)	100%
	SOAR	Portland Office 3 lawyers (including 1 Equity Corps) 1 DOJ representative 2 paralegals 2 Naturalization educational classes instructors	3,288
Hillsboro Office 1 DOJ representative 1 paralegal		n/a	
Catholic Charities	Portland Office 5 lawyers (including 1 Equity Corps) 3 DOJ representatives 1 intake specialist 7 legal assistants	4,199	20%
	Catholic Charities Rural Program Covered by Portland office staff *(includes Washington County numbers)	152	100%
	Eugene Office (starting 03/2020) 1 Equity Corps lawyer		100%
LCSNW	Portland Office 2 lawyers 8 DOJ representatives (this staff provides services to Yamhill Co, Salem and Beaverton satellite offices)	1,830	20-30%
	Yamhill County Office Staffed by 2 DOJ accredited representatives	541	
	Salem Office Staffed by Portland and Yamhill offices Began limited service end of 2019		

Table 23. Nonprofit legal services providing limited direct immigration legal services: Legal Aid Services of Oregon (LASO), Oregon Law Center (OLC), IRCO, Innovation Law Lab, Metropolitan Public Defender, Center for Nonprofit Legal Services (CNPLS), Victim Rights Law Center, and stand alone DOJ-Accredited Representative Offices

NONPROFIT SERVICES			
AGENCY / LOCATION	Staffing in 2019	Total Cases Closed in 2019	% Served Outside Portland Tri-County Area
LASO <i>Deschutes, Douglas, Klamath, Linn, Lincoln, Marion, Multnomah, Umatilla</i>	n/a	45*	n/a
OLC <i>Lane, Malheur</i>	Immigration legal services provided in Lane County and Ontario offices n/a	133*	100%
IRCO <i>Multnomah</i>	1 lawyer .8 FTE Equity Corps lawyer	n/a	n/a
Innovation Law Lab <i>Multnomah</i>	Equity Corps program management/ federal court litigation	n/a	n/a
Metropolitan Public Defender <i>Multnomah, Washington</i>	2 lawyers	472	3%
Center for Nonprofit Legal Services <i>Jackson</i>	1 lawyer	92*	100%
Victim Rights Law Center <i>Multnomah</i>	n/a	283	n/a
STAND ALONE DOJ-ACCREDITED REPRESENTATIVE OFFICES			
AGENCY / LOCATION	Staffing in 2019	Total Cases Closed in 2019	% Served Outside Portland Tri-County Area
PCUN (Centro de Servicios Para Campesinos) <i>Marion</i>	n/a	n/a	n/a
Causa <i>Marion</i>	n/a	n/a	n/a
Immigration Connection PDX <i>Multnomah</i>	n/a	n/a	n/a
New Life Church of the Nazarene <i>Jackson</i>	n/a	n/a	n/a
Somos Hispanos Unidos <i>Marion</i>	2 DOJ-accredited representatives 2 volunteers 1 assistant	161	60-70%

*reported to Oregon Law Foundation

N/A = Not applicable or not answered by time of publication