

August 6, 2020

Chad F. Wolf  
Acting Secretary  
U.S. Department of Homeland Security  
301 7th Street, S.W.  
Washington, D.C. 20528

William Barr  
Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Dear Acting Secretary Wolf and Attorney General Barr:

As public health and medical experts at leading public health schools, medical schools, hospitals, and other U.S. institutions, we write to express our grave concerns about the rule<sup>1</sup> proposed on July 9, 2020 that would bar refugees from asylum and other humanitarian protections in the United States purportedly to protect public health during pandemics.

The rule ignores and misuses the science and core principles of public health. It would grant the Department of Homeland Security (DHS) and the Department of Justice (DOJ)—agencies that lack public health expertise—authority to label asylum seekers as a national security threat, scapegoating them as vectors for a potentially vast array of diseases and denying them protection. These sweeping new bans would direct immigration authorities to deport people seeking refugee and torture protection to life-threatening dangers in violation of U.S. law and treaty obligations. Like the March 20, 2020 order<sup>2</sup> from the Centers for Disease Control and Prevention (CDC) that DHS has been using to evade humanitarian protections at the border under the pretext<sup>3</sup> of COVID-19, the proposed regulation is based on specious justifications and would be detrimental.

We urge DHS and DOJ to rescind the proposed rule and instead direct U.S. officials to use rational, evidence-based public health measures to safeguard both the health of the public and the lives of adults, families, and children seeking protection from persecution and torture. Public health cannot justify this discriminatory policy that imperils the lives of people seeking protection in the United States.

### **The Proposed Regulation Is Not Based on Sound Public Health Principles**

Despite its pretext of protecting public health during pandemics, the proposed rule would undermine public health and further endanger people seeking protection in the United States.

While purporting to address current and future diseases that could cause a pandemic, the rule would, in fact, allow DHS and DOJ to ban refugees based on a host of other diseases<sup>4</sup> including those that are not subject to U.S. quarantine laws, are treatable, and/or do not present risk of widespread public transmission, such as gonorrhea, syphilis, tuberculosis, and Hansen's disease (leprosy), among others.

There is no public health rationale to applying public health measures differently based on immigration status. Yet the rule bars asylum seekers who have even briefly transited through a country where a covered disease is prevalent without regard to whether an individual has been exposed. While States may use health measures such as testing or quarantine, as needed, the U.N. Refugee Agency (UNHCR) has explained in legal guidance regarding asylum access during the COVID-19 pandemic that states may not

impose measures that preclude refugees from admission or deny them an effective opportunity to seek asylum, and that “(d)enial of access to territory without safeguards to protect against refolement cannot be justified on the grounds of any health risk.”<sup>5</sup>

The rule is disproportionate and not designed to halt disease transmission. It would mandatorily bar a refugee who “has come into contact” with a communicable disease covered by the rule at any point in the past and does not limit its application to recent exposure or infection. Asylum seekers infected with a covered disease while *in* the United States would be barred from protection—potentially even years after arriving in the United States—and subject to deportation, including asylum-seeking doctors, nurses, or other essential personnel engaged in vital work to address the disease. Perversely, the rule punishes asylum seekers, including those in U.S. immigration detention, for the failure of U.S. authorities to prevent and mitigate communicable disease outbreaks. Public trust is essential for the success of public health measures. By explicitly linking health concerns to immigration enforcement, this rule will likely erode trust, discourage care-seeking, and undermine public health goals.

In bypassing public health experts, the rule would authorize unqualified government functionaries who lack public health or medical training to make assessments with profound implications for access to asylum and other humanitarian protections. For instance, DHS and DOJ lack the expertise and ability to assess the prevalence of a communicable disease in another country. Immigration judges and DHS officers are not qualified to make medical diagnoses yet would be directed by the rule to determine whether an asylum seeker’s symptoms are indicative of a covered disease. This is particularly troubling during preliminary fear screening interviews when the vast majority of asylum seekers are detained, unrepresented, and have virtually no access to independent medical assessments.

### **Our Recommendations for an Alternative Approach**

Rather than banning people seeking protection, U.S. authorities should adopt measures grounded in the best available public health guidance. With respect to SARS-COV-2, leading public health experts have recommended measures—detailed in the attached letter<sup>6</sup> and paper<sup>7</sup>—to protect U.S. border officers, those exercising their legal right to request protection in the United States, and the public health of our nation. In addition, U.S. authorities should heed the recommendations of public health and prison experts to stem infections by drastically reducing the populations in Immigration and Customs Enforcement detention facilities by releasing asylum seekers and other immigrants to shelter with family or friends.

Public health measures in the United States have moved on from the days when individuals with communicable diseases were treated merely as vectors of disease and immigrants were scapegoated for outbreaks and barred from the United States. Just ten years ago, the CDC lifted<sup>8</sup> an immigration ban on individuals living with HIV—first adopted in the 1980s when there were more known cases of HIV/AIDS in the United States than anywhere else in the world—acknowledging that the restrictions were not an effective or necessary public health measure. The United States should not repeat past mistakes by adopting another discriminatory and ineffective ban on the pretext of public health.

This proposed rule, like the March 20 CDC order, is xenophobia masquerading as a public health measure, and both must be rescinded. These policies undermine the credibility of public health practice and expertise in the United States, with devastating results for the safety and well-being of both asylum

seekers and the American public. The United States can and must both safeguard public health during emergencies and uphold U.S. laws and treaties protecting the lives of those seeking safety and freedom here.

Sincerely,\*

**Pooja Agrawal**, MD, MPH, Director of Global Health Education, Assistant Professor of Emergency Medicine, Department of Emergency Medicine, Yale University School of Medicine

**Lucy Allbaugh**, PhD, Assistant Professor, University of Dayton

**Brandon Allport Altillo**, MD, MPH, Assistant Professor of Population Health, Dell Medical School, The University of Texas at Austin

**Joe Amon**, PhD, MSPH, Clinical Professor, Community Health and Prevention, Director of Global Health, Dornsife School of Public Health, Drexel University

**Douglas Ander**, MD, Professor of Emergency Medicine, Emory University School of Medicine

**Jocelyn Anderson**, PhD, RN, Assistant Professor, Pennsylvania State University College of Nursing

**Miranda Aragón**, MD, Assistant Professor and Faculty, University of New Mexico School of Medicine

**Bonnie H. Arzuaga**, MD, Instructor of Pediatrics, Harvard Medical School

**Anika Backster**, MD, MSCR, Assistant Professor, Department of Emergency Medicine, Emory University School of Medicine

**Jared Baeten**, MD, PhD, Professor, Global Health, Epidemiology, Medicine - Allergy and Infectious Disease, Vice Dean for Strategy, Faculty Affairs and New Initiatives, University of Washington School of Public Health

**Jen Balkus**, PhD, MPH, Assistant Professor, Department of Epidemiology, University of Washington School of Public Health

**Ruanne V. Barnabas**, DPhil, MSc, MBChB, Associate Professor, Global Health, Allergy and Infectious Diseases, Department of Global Health, University of Washington

**Mary Bassett**, MD, PhD, François-Xavier Bagnoud Professor of the Practice of Health and Human Rights, Director of the François-Xavier Bagnoud Center for Health and Human Rights, Harvard T.H. Chan School of Public Health

**Gilberte (“Gigi”) Bastien**, PhD, MA, Assistant Professor, Department of Psychiatry and Behavioral Sciences, Associate Director of Office of Global Health Equity, Morehouse School of Medicine

**Nicole Battaglioli**, MD, Assistant Professor, Emergency Medicine, Emory University School of Medicine

**Stefano M. Bertozzi**, MD, PhD, Professor of Health Policy and Management, Dean Emeritus, UC Berkeley School of Public Health

**Jacqueline Bhabha**, JD, MsC, Professor of the Practice of Health and Human Rights, Harvard T.H.Chan School of Public Health, Director of Research, FXB Center for Health and Human Rights

**Eliot Blum**, MD, FACEP, Assistant Professor, Department of Emergency Medicine, Emory University School of Medicine

**Jacob Bor**, SD, Assistant Professor of Global Health, Boston University School of Public Health

**Joel G. Breman**, MD, DTPH, FIDSA, FASTMH, President, American Society of Tropical Medicine & Hygiene

**Jesse B. Bump**, PhD, MPH, Executive Director, Takemi Program in International Health, Harvard T.H. Chan School of Public Health

**Scott Burris**, JD, Professor, Director of the Center for Public Health Law Research, Temple University Beasley School of Law

**Jada Bussey-Jones**, MD, Professor of Medicine, Emory University School of Medicine

**Jose E. Campo Maldonado**, MD, MSCI, FACP, Assistant Professor, University of Texas Rio Grande Valley School of Medicine

**Valeria Cantos Lucio**, MD, Assistant Professor, Department of Medicine, Emory University School of Medicine

**Sara Casey**, DrPH, Assistant Professor, Heilbrunn Department of Population and Family Health, Columbia University Mailman School of Public Health

**Ted Cohen**, MD, MPH, DPH, Professor, Epidemiology of Microbial Diseases, Yale School of Public Health

**Sarah Cook**, MD, Assistant Professor of Psychiatry, Emory University School of Medicine

**Cheryl Conner**, MD, MPH, Assistant Professor of Clinical Medicine, University of Illinois at Chicago

**José F. Cordero**, MD, MPH, FAAP, FACMG, Patel Distinguished Professor of Public Health, Department Head, Epidemiology and Biostatistics, University of Georgia College of Public Health

**Joanne Csete**, PhD, MPH, Associate Professor, Columbia University Mailman School of Public Health

**Paula J. Davis-Olwell**, PhD, MA, Clinical Assistant Professor, Global Health Institute, Department of Epidemiology and Biostatistics, University of Georgia

**Joseph Eisenberg**, PhD, MPH, Chair and Professor, Epidemiology, Professor, Global Public Health, University of Michigan School of Public Health

**Wafaa El-Sadr**, MD, MPH, MPA, Director, ICAP at Columbia University, University Professor of Epidemiology and Medicine, Mathilde Krim-amfAR Chair of Global Health, Columbia University Mailman School of Public Health

**Eleanor Emery**, MD, Cambridge Health Alliance; Department of Internal Medicine, Northern Navajo Medical Center, Shiprock, New Mexico

**Eugenia Eng**, DrPH, MPH, Professor of Health Behavior, Gillings School of Global Public Health, University of North Carolina at Chapel Hill

**Kacey Ernst**, PhD, MPH, Professor & Program Director, Epidemiology, Epidemiology and Biostatistics Department, Mel and Enid Zuckerman College of Public Health, University of Arizona

**Dabney P. Evans**, PhD, MPH, Associate Professor, Emory University Rollins School of Public Health

**Eugene Farber**, PhD, ABPP, Professor of Psychiatry and Behavioral Sciences, Emory University School of Medicine

**Shannon Farley**, DrPH, Associate Research Scientist, Columbia University Mailman School of Public Health

**Glenn J. Fennelly**, MD, MPH, Department of Pediatrics, Rutgers New Jersey Medical School, Rutgers Global Health Institute

**Hope Ferdowsian**, MD, MPH, FACP, FACPM, Associate Professor of Medicine, University of New Mexico School of Medicine; Medical Expert, Physicians for Human Rights

**Paul Fleming**, PhD, MPH, Assistant Professor, University of Michigan School of Public Health

**Giorgio Franyuti**, MD, Director General, Medical IMPACT

**Linda P. Fried**, MD, MPH, Dean and DeLamar Professor of Public Health, Columbia University Mailman School of Public Health

**Eric A. Friedman**, JD, Global Health Justice Scholar, O'Neill Institute for National and Global Health Law, Georgetown University Law Center

**Brittany Friend**, MD, Child and Adolescent Psychiatry Fellow, Emory University School of Medicine

**Meghan Gallagher**, PhD, MPH, Lecturer, Columbia University Mailman School of Public Health

**Lauren Gensler**, MD, Assistant Professor, Emory University School of Medicine

**Rahel M. Gizaw**, MD, Emergency Medicine Resident, Emory University School of Medicine

**Nancy Glass**, PhD, MPH, MS, RN, Professor, Independence Foundation Chair, Johns Hopkins School of Nursing, Associate Director, Johns Hopkins Center for Global Health

**Gregg Gonsalves**, PhD, Assistant Professor, Epidemiology of Microbial Diseases, Yale School of Public Health

**David R. Goldsmith**, MD, Assistant Professor, Department of Psychiatry and Behavioral Sciences, Emory University School of Medicine

**Lawrence O. Gostin**, JD, LLD, University Professor, Founding O’Neill Chair in Global Health Law, Faculty Director, O’Neill Institute for National and Global Health Law, Director, World Health Organization Collaborating Center on National & Global Health Law, Georgetown University

**Karen A. Goraleski**, Chief Executive Officer, American Society of Tropical Medicine and Hygiene

**Megan Gray**, MD, Assistant Professor of Pediatrics and Population Health, Dell Medical School, The University of Texas at Austin

**M. Claire Greene**, PhD, MPH, Program on Forced Migration and Health, Columbia University Mailman School of Public Health

**Sofia Gruskin**, JD, MIA, Director, USC Institute on Inequalities in Global Health, Professor, Keck School of Medicine, Gould School of Law, University of Southern California

**Jill Guernsey de Zapien**, Director, Border, Transborder, and Binational Public Health Collaborative Research, Health Promotion Sciences, Mel and Enid Zuckerman College of Public Health, University of Arizona

**Michele Heisler**, MD, MPA, Professor, Department of Internal Medicine, Health Behavior and Health Education, University of Michigan School of Public Health

**Linda Hill**, MD, Clinical Professor, Department of Family Medicine and Public Health, Medical Director of the Refugee Health Assessment Program, UC San Diego School of Medicine

**Tom Inglesby**, MD, Director, Center for Health Security, Professor, Department of Environmental Health and Engineering, Johns Hopkins Bloomberg School of Public Health, Infectious Disease Epidemiology Division, Johns Hopkins Department of Medicine

**Julie Jacobson**, MD, DTM&H, Managing Partner, Bridges to Development; President-elect, American Society of Tropical Medicine & Hygiene

**Monik C. Jiménez**, ScD, SM, FAHA, Assistant Professor, Department of Epidemiology, Harvard TH Chan School of Public Health, Harvard Medical School/Brigham and Women’s Hospital

**Elena Jiménez Gutiérrez**, MD, Assistant Professor, Division of General and Hospital Medicine, Department of Medicine, The University of Texas Health Science Center at San Antonio

**Chandy C. John**, MD, MS, FASTMH, Ryan White Professor of Pediatrics, Director of the Ryan White Center for Pediatric Infectious Disease and Global Health at Indiana University School of Medicine; Past-President, American Society of Tropical Medicine & Hygiene

**Danielle Jones**, MD, FACP, Associate Professor of Medicine, Associate Program Director, Department of Medicine, Emory University School of Medicine

**Eric C. Jones**, PhD, Assistant Professor of Social Epidemiology, University of Texas Health Science Center at Houston School of Public Health

**S. Patrick Kachur**, MD, MPH, FACPM, FASTMH, Professor, Columbia University Mailman School of Public Health, Heilbrunn Department of Population and Family Health, Columbia University Irving Medical Center

**Ameeta Kalokhe**, MD, MSc, Assistant Professor, Division of Infectious Diseases, Emory University School of Medicine, Department of Global Health, Emory University Rollins School of Public Health

**Nadine Kaslow**, PhD, Professor, Emory University School of Medicine

**Jennifer Kasper**, MD, MPH, Assistant Professor of Pediatrics and Global Health and Social Medicine, and Chair, Faculty Advisory Committee on Global Health, Harvard Medical School

**Kaveh Khoshnood**, PhD, Associate Professor, Yale School of Public Health

**Michael Khoury**, MD, Assistant Professor, The Georgia Human Rights Clinic at Emory University School of Medicine

**Elizabeth J. King**, PhD, MPH, Assistant Professor, Department of Health Behavior and Health Education, University of Michigan School of Public Health

**Nolan Kline**, PhD, MPH, Assistant Professor, Rollins College

**Brent Langellier**, PhD, Assistant Professor, Dornsife School of Public Health, Drexel University

**Ling San Lau**, MBBS, MPH, Senior Program Officer, Columbia University Mailman School of Public Health

**Kathryn Laughon**, PhD, RN, FAAN, Associate Professor, University of Virginia School of Nursing

**Neil S. Lava**, MD, Associate Professor, Neurology, Emory University School of Medicine

**Alan Lifson**, MD, PhD, Professor of Epidemiology and Community Health, University of Minnesota School of Public Health

**Marc Lipsitch**, DPhil, Professor of Epidemiology, Harvard T.H. Chan School of Public Health

**Danielle Loeb**, MD, MPH, Associate Professor of Medicine, Division of General Internal Medicine, University of Colorado School of Medicine

**Jennifer Lom**, MD, Assistant Professor of Medicine, Emory University School of Medicine

**Stuart L. Lustig**, MD, MPH, Legal-Medical Advisor, Center for Gender & Refugee Studies, UC Hastings College of the Law

**Dominic H. Mack**, MD, MBA, Professor, Family Medicine, Director, National Center for Primary Care, Morehouse School of Medicine

**Suzanne Maman**, PhD, MHS, Professor of Health Behavior, University of North Carolina Gillings School of Global Public Health

**Robert P. Marlin**, MD, PhD, MPH, Chief, Metta Health Center, Lowell Community Health Center, Lowell, Massachusetts

**Hon. Keith Martin**, MD, PC, Executive Director, Consortium of Universities for Global Health

**Natasha Martin**, DPhil, Associate Professor, Division of Infectious Diseases and Global Public Health, UC San Diego

**William Martinez**, PhD, Assistant Professor, Department of Psychiatry and Behavioral Sciences, UC San Francisco

**Ana Martinez-Donate**, PhD, Associate Professor, Dornsife School of Public Health, Drexel University

**Alexandria Maybury**, MD, Assistant Professor, Emory University School of Medicine

**Patrick McColloster**, MD, Associate Professor, Baylor College of Medicine

**Joseph B. McCormick**, MD, MS, James Steele Professor of Epidemiology, University of Texas, Health Science Center at Houston, School of Public Health Brownsville

**Terry McGovern**, JD, Harriet and Robert H. Heilbrunn Professor and Chair, Director, Global Health Justice and Governance, Heilbrunn Department of Population and Family Health, Columbia University Mailman School of Public Health

**Brian McGregor**, PhD, Adjunct Clinical Assistant Professor, Morehouse School of Medicine

**Katherine McKenzie**, MD, Assistant Professor, Yale School of Medicine

**Benjamin Mason Meier**, JD, LL.M, PhD, Associate Professor of Global Health Policy, University of North Carolina at Chapel Hill

**Ranit Mishori**, MD, MHS, FGAACFP, Professor, Family Medicine, Georgetown School of Medicine, Director, Global Health Initiatives, Director, Robert L. Phillips, Jr. Health Policy Fellowship

**Cecilia Menjívar**, PhD, MA, MS, Professor and Dorothy L. Meier Social Equities Chair, University of California, Los Angeles

**Nicolas A. Menzies**, PhD, Assistant Professor of Global Health, Harvard TH Chan School of Public Health

**Amy Cecilia Mogal**, MD, PhD, Clinical Instructor, Department of Anesthesia, Stanford University; Attending Physician, Critical Care Unit, Washington Hospital Healthcare System, Fremont, California

**Karin E. Montero**, MD, FACS, Medical Director, Center for Survivors of Torture, Austin, Texas

**Alejandro Moreno**, MBBS, MPH, JD, FACP, Assistant Dean and Director, Department of Medical Education, Associate Professor, Department of Internal Medicine, Dell Medical School, The University of Texas at Austin

**Rachel T. Moresky**, MD, MPH, FACEP, Associate Professor, Population and Family Health Department, Columbia University Mailman School of Public Health & Associate Professor, Emergency Medicine Department, Columbia University College of Physicians and Surgeons

**Juliana E. Morris**, MD, EdM, Clinical Instructor, School of Medicine, UC San Francisco

**Peter Navario**, PhD, MPH, Clinical Assistant Professor, Department of Public Health Policy and Management at New York University School of Global Public Health; Executive Director, HealthRight International

**Laura B. Nellums**, PhD, MSc, Assistant Professor in Global Health, School of Medicine, University of Nottingham

**Aliza Norwood**, MD, Assistant Professor of Internal Medicine and Population Health, Dell Medical School, The University of Texas at Austin

**D. Daphne Owen**, MD, Assistant Professor of Emergency Medicine, University of Pennsylvania

**Ashli Owen-Smith**, PhD, SM, Assistant Professor of Health Policy and Behavioral Sciences, School of Public Health, Georgia State University

**Kathleen Page**, MD, Associate Professor, Division of Infectious Diseases, Johns Hopkins University School of Medicine, Center for Humanitarian Health, Johns Hopkins University

**Kimberly Page**, PhD, MPH, MS, Professor, Epidemiology, Biostatistics and Preventive Medicine, University of New Mexico Health Sciences Center

**Kathleen A. Parker**, MA, MPH, CHES ret., Public Health Education Specialist, 1983-2004, Centers for Disease Control and Prevention

**Parveen Parmar**, MD, MPH, Associate Professor, Clinical Emergency Medicine, Chief, Division of Global Emergency Medicine, Keck School of Medicine, University of Southern California

**Snehal Patel**, MD, Assistant Professor, Department of Internal Medicine, Dell Medical School, The University of Texas at Austin

**Andrés Patiño**, MD, Assistant Professor, Department of Emergency Medicine, Emory University

**Elizabeth Peacock**, MD, PhD, Clinical Faculty, Department of Emergency Medicine, Emory University

**Jose Quiroga**, MD, Board Member, Physicians for Social Responsibility - Los Angeles

**Tracy L. Rabin**, MD, SM, Associate Professor of Medicine and Director, Office of Global Health, Department of Internal Medicine, Yale University School of Medicine

**Nalini Ranjit**, PhD, MS, Associate Professor, Health Promotion and Behavioral Sciences, University of Texas School of Public Health, University of Texas Health Science Center at Houston – Austin

**Paulina Rebolledo**, MD, MSc, Assistant Professor of Medicine and Global Health, Emory University

**Les Roberts**, PhD, Professor, Program on Forced Migration and Health, Columbia University Mailman School of Public Health

**W. Courtland Robinson**, PhD, Associate Professor, Center for Humanitarian Health, Johns Hopkins Bloomberg School of Public Health

**Barbara Robles-Ramamurthy**, MD, Assistant Professor in Psychiatry, University of Texas Health - San Antonio

**Roger Rochat**, MD, Professor, Global Health, Epidemiology, Rollins School of Public Health, Emory University

**Francis Rollin**, MD, MPH, Assistant Professor of Medicine, Emory University School of Medicine

**Cynthia Romero**, MD, Assistant Professor of Emergency Medicine, Emory University School of Medicine and Emory Healthcare

**Robert K. Ross**, MD, President and Chief Executive Officer, The California Endowment

**Richard Rothenberg**, MD, MPH, Regents' Professor, Georgia State University School of Public Health

**Andrew S. Rowland**, PhD, MA, Associate Professor, Epidemiology, University of New Mexico College of Population Health

**Leonard Rubenstein**, JD, LL.M., Professor of the Practice, Johns Hopkins Bloomberg School of Public Health

**Samantha Sabo**, DrPH, MPH, Associate Professor, Department of Health Sciences, Northern Arizona University

**William M. Sage**, MD, JD, Professor, School of Law and Dell Medical School, The University of Texas at Austin

**Goleen Samari**, PhD, MPH, MA, Assistant Professor of Population and Family Health, Program on Forced Migration and Health, Columbia University Mailman School of Public Health

**John Santelli**, MD, MPH, Professor, Population and Family Health and Pediatrics, Columbia University Mailman School of Public Health

**Stacie Schmidt**, MD, Assistant Professor, Department of Medicine, Emory University School of Medicine

**Jaime Sepulveda**, MD, MPH, MSc, DrSc, Haile T. Debas Distinguished Professor of Global Health, Executive Director, Institute for Global Health Sciences, UC San Francisco

**Josefa Simkin**, MD, Chair Family Practice Department, Watsonville Community Hospital, Watsonville, California

**Adria Simon**, MD, Assistant Professor of Emergency Medicine, Columbia University

**B. R. Simon Rosser**, PhD, MPH, LP, Professor, Division of Epidemiology and Community Health, University of Minnesota School of Public Health

**Hina Shaikh**, JD, MPH, Research Director and Ethics Oversight Staff, George Washington University Milken Institute School of Public Health

**Joshua M. Sharfstein**, MD, Professor of the Practice of Health Policy and Management, Johns Hopkins Bloomberg School of Public Health

**Anandi Sheth**, MD, MSc, Assistant Professor, Department of Medicine, Division of Infectious Diseases, Emory University School of Medicine

**Neha S. Singh**, PhD, MPH, Co-Director, Health in Humanitarian Crises Centre and Assistant Professor, London School of Hygiene and Tropical Medicine, UK

**Kumi Smith**, PhD, MPIA, Assistant Professor, Division of Epidemiology and Community Health, University of Minnesota

**Craig Spencer**, MD, MPH, Director of Global Health in Emergency Medicine at New York-Presbyterian/Columbia University Medical Center, Assistant Professor of Emergency Medicine and Population and Family Health at the Columbia University Medical Center, Heilbrunn Department of Population and Family Health - Program on Forced Migration and Health, Columbia University Mailman School of Public Health

**Paul B. Spiegel**, MD, MPH, Professor of Practice, Johns Hopkins Bloomberg School of Public Health; Director, Center for Humanitarian Health

**Andrew Springer**, DrPH, MPH, Associate Professor, Health Promotion and Behavioral Sciences, University of Texas Health Science Center, School of Public Health - Austin

**Mia Stange**, MPH, Terra Firma Medical-Legal Partnership, Montefiore Medical Center

**Steffanie Strathdee**, PhD, MSc, Associate Dean of Global Health Sciences and Harold Simon Professor in the Department of Medicine, Co-Director of the Center for Innovative Phage Applications and Therapeutics, UC San Diego School of Medicine

**Til Stürmer**, MD, PhD, MPH, Nancy A. Dreyer Distinguished Professor and Chair, Department of Epidemiology, Gillings School of Global Public Health, University of North Carolina at Chapel Hill

**Parmi S. Suchdev**, MD, MPH, FAAP, Associate Director, Emory Global Health Institute, Director, Global Health Office of Pediatrics, Professor, Department of Pediatrics and Hubert Department of Global Health, Emory University

**Nina Sun**, JD, Assistant Clinical Professor and Deputy Director, Global Health and Human Rights, Dornsife School of Public Health, Drexel University

**Andrea Swartzendruber**, PhD, MPH, Assistant Professor, Epidemiology and Biostatistics, University of Georgia College of Public Health

**Sofia Tenorio Martínez**, MD, MPH, Clinical Research Coordinator, Department of Pediatrics, Emory University School of Medicine

**Lisa M. Thompson**, PhD, FNP, RN, Associate Professor, Emory University Nell Hodgson School of Nursing

**Liza Vertinsky**, PhD, JD, Associate Professor, Emory Law School

**Rachel Waford**, PhD, ABPP, Assistant Professor, Rollins School of Public Health, Emory University, Department of Psychiatry and Behavioral Sciences, Emory University School of Medicine

**Ron Waldman**, MD, MPH, President, Doctors of the World - USA

**Karen Wang**, MD, MHS, Assistant Professor, Yale School of Medicine

**Martha Ward**, MD, Associate Professor, Emory University School of Medicine

**Jon Warkentin**, MD, MPH, President-Elect, National Society of TB Clinicians

**Scott C. Weaver**, PhD, Fellow of the American Society for Microbiology, John Sealy Distinguished University Chair in Human Infections and Immunity, Chair, Department of Microbiology and Immunology, University of Texas Medical Branch

**Aliza Wingo**, MD, Assistant Professor, Department of Psychiatry and Behavioral Sciences, Emory University School of Medicine

**Andrea L. Wirtz**, PhD, MHS, Assistant Professor, Johns Hopkins Bloomberg School of Public Health

**Negar Yaghooti**, MD, University of New Mexico Hospital

**Monette Zard**, MA, Allan Rosenfield Associate Professor of Forced Migration and Health, Director of the Forced Migration and Health Program, Heilbrunn Department of Population and Family Health, Columbia University Mailman School of Public Health

**Amy Zeidan**, MD, Assistant Professor, Emergency Medicine, Co-director, Human Rights/Asylum Clinic, Emory University School of Medicine

*\* Institutional affiliation is provided for identification purposes only and does not constitute institutional endorsement.*

---

<sup>1</sup> U.S. Citizenship and Imm. Services, Dep't of Homeland Security; Exec. Office for Imm. Review, Dep't of Justice, "Security Bars and Processing," 85 FR 41202, July 9, 2020, <https://www.govinfo.gov/content/pkg/FR-2020-07-09/pdf/2020-14758.pdf>.

<sup>2</sup> U.S. Dep't of Health and Human Services & Centers for Disease Control and Prevention, "Order Suspending Introduction of Certain Persons from Countries Where a Communicable Disease Exists," Mar. 20, 2020, [https://www.cdc.gov/quarantine/pdf/CDC-Order-Prohibiting-Introduction-of-Persons\\_Final\\_3-20-20\\_3-p.pdf](https://www.cdc.gov/quarantine/pdf/CDC-Order-Prohibiting-Introduction-of-Persons_Final_3-20-20_3-p.pdf).

<sup>3</sup> Human Rights First, "Pandemic as Pretext: Trump Administration Exploits COVID-19, Expels Asylum Seekers and Children to Escalating Danger," May 2020, <https://www.humanrightsfirst.org/sites/default/files/PandemicAsPretextFINAL.pdf>.

<sup>4</sup> 42 C.F.R. § 34.2.

<sup>5</sup> UNHCR, "Key Legal Considerations on access to territory for persons in need of international protection in the context of the COVID-19 response," Mar. 16, 2020, <https://www.unhcr.org/cz/wp-content/uploads/sites/20/2020/04/UNHCR-Legal-Considerations-on-Access-to-Territory-in-the-Covid-19-Pandemic-March-2020.pdf>.

<sup>6</sup> Letter to HHS Secretary Azar and CDC Director Redfield signed by leaders of public health schools, medical schools, hospitals, and other U.S. institutions, May 18, 2020, <https://www.publichealth.columbia.edu/public-health-now/news/public-health-experts-urge-us-officials-withdraw-order-enabling-mass-expulsion-asylum-seekers>.

<sup>7</sup> "Public Health Measures to Safely Manage Asylum Seekers and Children at the Border," May 2020, <https://www.humanrightsfirst.org/resource/public-health-measures-safely-manage-asylum-seekers-and-children-border>.

<sup>8</sup> Centers for Disease Control and Prevention, Dep't of Health and Human Services, "Medical Examination of Aliens—Removal of Human Immunodeficiency Virus (HIV) Infection From Definition of Communicable Disease of Public Health Significance," 74 FR 56547, Nov. 2, 2009, <https://www.govinfo.gov/content/pkg/FR-2009-11-02/pdf/E9-26337.pdf>.