



25 January 2022

Interagency Task Force on the Reunification of Families
U.S. Department of Homeland Security

Re: Docket No. DHS-2021-0051, FR 70512 Vol. 86, No. 235
Identifying Recommendations to Support the Work of the Interagency Task Force on the Reunification of Families

Dear Members of the Interagency Task Force on the Reunification of Families:

DNA Bridge (dnabridge.org) is a volunteer consortium of scientists, human rights advocates, and scholars that advocates for a DNA-informed approach to identifying families of children separated by armed conflicts, disasters, and immigration policies and reunifying them in a secure and ethical manner. The comments herewith are from DNA Bridge and should not be attributed to our employers, professional affiliations, funding agencies, or any other person or entity.

DNA Bridge has developed a DNA database approach that can reunify separated migrant children with biological relatives. Our approach, built on ideas developed to reunify families in other countries and to identify human remains, promotes the best interests of the child, and respects the agency of families while preserving privacy. This approach was published in 2021 in the peer-reviewed [article](#), “Using DNA to reunify separated migrant families,” in the scientific journal *Science*. We also presented as a panel at the American Association for the Advancement of Science (AAAS) Science Technology and Human Rights [meeting](#) in October 2021.

Our approach fills an immediate gap in the efforts to reunify those families separated under the Zero-Tolerance policy adopted by the Trump Administration in April 2018 by calling for a trauma-informed approach that protects the agency and rights of families. As put forth in the strategy we devised, DNA testing should be one of the tools available to the affected families and future families facing separations. DNA data can provide leads in so-called “double blind” cases, meaning those for which the whereabouts of the parent(s) are unknown to the child, and vice versa. DNA data also can support biological families who are in touch with one another, but who remain separated due to documents being left behind, lost, or destroyed in the process of migration – we call these families the “long-term separated families.”

The Task Force has made great strides in its efforts to reunify families separated by the Zero-Tolerance policy, as evidenced by the reunification of 112 separated children for a total of nearly 3,000 reunified families as of early January 2022. We commend these efforts, particularly given the care that was taken to protect the identities of the families. At the same time, the family reunification process has been slow, rendering it inadequate for optimally addressing the urgent health and psychosocial needs of many of these families. Moreover, Congressional actions (or, absent bipartisan support, Executive Orders) are needed to rectify the past wrongs and to lessen the anguish of these families. A robust restorative approach is called for, including granting asylum and social services to reassure families that coming forward will not penalize and endanger their children with deportation. DNA data could expedite reunification, thereby lessening the burden on families and maximizing wellbeing. DNA Bridge through its consortium partners can support the Task Force by providing a central, secure and lawful data-base and data processing system, including DNA capabilities, that protects the privacy rights of individuals and facilitates inter-agency cooperation.

Looking forward, we must do better to manage immigration screening and tracing of separated families to avoid repeating history. We must develop the infrastructure to manage the hundreds of thousands of migrant children and families that will continue to seek refuge; we must have plans in place to screen these families without inflicting the undue harm caused by separations; and we must have strategies to expedite reunifications, prioritizing family unity above all whenever in the best interest of the child and desired by the family. An established DNA-informed approach can enable biological family members to find each other even if their searches are asynchronous, as might occur when a parent or child who is initially hesitant or unable to come forward later decides to pursue a search. Finally, as we work to prevent government-imposed family separations from ever occurring again, an extra-governmental, secured DNA database can serve as a registry of individuals whose right to family unity has been violated.

DNA Bridge, which is comprised of representatives from human rights organizations and DNA labs in the United States, Central America, and Europe, also partners with the International Commission on Missing Persons (ICMP) and with DNA-experienced non-governmental organizations in Guatemala and El Salvador. In early 2022, we will conduct exploratory research in Central America to refine the data security approaches and operational needs of our strategy. Meanwhile, our partnership with ICMP is aiding the development of data governance strategies to secure genetic data transmitted at an international level.

A DNA-driven approach has applicability beyond the *Ms. L. v. ICE* families that are the current focus of the Task Force to ameliorate the harms of past and future separations. We recognize that supporting a separated family considers safety of the child, ages, and welfare in addition to biological relationships. Our approach can provide evidence of families *with* biological relationships and can connect family relationships beyond parent-child ones. For example, DNA data also can be used to connect children with grandparents, siblings, and other avuncular relationships.

DNA Bridge recommends the following steps, which should be taken immediately:

1. Reunification of families wrongfully separated.
2. Restitution for families harmed by the Zero-Tolerance policy, including granting asylum and social services to reassure families that coming forward will not penalize their children with deportation.
3. An evaluation of the circumstances, metrics (e.g., ages), and relationships (e.g., parent-child or not, genetic or not) of the 5,000+ families separated during the Zero-Tolerance policy.

Beyond the Zero-Tolerance cases, we recommend:

4. Tracking of circumstances, metrics, and relationships of families presenting at U.S. border points, including reasons for separations.
5. Coordinated outreach to separated adults in Central America for DNA data acquisition to pilot the DNA Bridge strategy.
6. Coordinated outreach to children in the United States separated from their families for DNA data acquisition to pilot the DNA Bridge strategy.
7. Cooperative development of data protection and provenance protocols for managing both double-blind and long-term separated families.

We also recommend expanding the DNA Bridge strategy beyond Latin American countries to become a global, humane approach to reunifying separated families.

Separations of families globally and within U.S. borders will continue in the future, whether due to immigration policies, the perils of the migration journey, disasters, or armed conflicts. This is

demonstrated by the recent arrival of children from [Afghanistan](#). Establishing sustainable data management strategies that respect the human right to family unity can, as part of a comprehensive approach, minimize separations and expedite reunifications. Our strategy is a starting point and we would welcome an opportunity for dialogue with the Task Force.

Please feel free to contact any member of DNA Bridge consortium for more information. Some key contacts within our consortium are listed below.

Sincerely,



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