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November 28, 2021

Submitted via the Federal eRulemaking Portal (www.regulations.gov)

Andria Strano
Acting Chief, Office of Policy and Strategy
Division of Humanitarian Affairs
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: DHS Docket No. USCIS-2021-0006, public comment on proposed regulations to fortify and strengthen Deferred Action for Childhood Arrivals (“DACA”)

Dear Ms. Strano:

On behalf of the Civil Rights Project/Proyecto Derechos Civiles at UCLA (“the CRP”), we submit this public comment letter in response to the U.S. Department of Homeland Security’s (“DHS”) proposed regulatory rule, Deferred Action for Childhood Arrivals (DHS Docket No. USCIS-2021-0006), published September 28, 2021. In the first section of this comment letter we write in strong support of the proposed rule to strengthen and fortify the DACA program and highlight relevant social science research. In the second section of this comment letter we respectfully provide methodological critique and urge that in the final regulations DHS make sensible changes to the age and residency requirements.

The CRP is a university research center at UCLA that works with scholars from across the U.S. and bridges the gap between social science and the law in order to enhance public understanding of matters related to race, ethnicity, immigration and civil rights. Since its founding in 1996 at Harvard University, the CRP has had a special interest in promoting equal access and pathways of opportunities to higher education. The CRP has commissioned books and research papers that extensively document patterns of inequality and barriers in K-12 and higher education faced by undocumented and other immigrant students.¹

¹ UCLA Civil Rights Project – Research books and papers on [Immigrant students](#).



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I. Social science evidence strongly supports fortification of DACA

In this section we highlight for DHS's consideration some of the important social science research studies relevant to cost-benefit analyses of DACA. A comprehensive synthesis of the voluminous peer-reviewed research (see e.g., Yoshikawa et al. 2017; Empirical Scholars amicus brief in *DHS v. Regents* (2019)²) is beyond the scope of this succinct public comment letter, but at the CRP we believe it is important to spotlight the following illustrative research studies addressing the benefits of DACA to recipients, their families and to American society:

Mental Health of Undocumented Young People

- Undocumented immigrants encounter fear and stress associated with immigrant status and immigration policy, which can directly impact their mental well-being in school and beyond (Gándara & Ee, 2021³; Kaushal et al., 2018⁴).
- Using quasi-experimental methods, Venkataramani et al. 2017 found that DACA "effects on mental health were large and clinically significant, with the DACA [program] significantly reducing the odds of individuals reporting moderate or worse psychological distress."⁵ In another quasi-experimental study, Giuntella et al. 2021 found that the DACA policy change was associated with a positive impact on immigrants' sleep patterns, but the positive benefit disappeared after 2016 during the years that the prior administration attempted to rescind DACA and blocked new DACA requests.⁶

² Yoshikawa, Hirokazu, Carola Suárez-Orozco, and Roberto G. Gonzales. "Unauthorized status and youth development in the United States: Consensus statement of the society for research on adolescence." [Journal of Research on Adolescence 27, no. 1 \(2017\): 4-19](#); [Amici Curiae Brief of Empirical Scholars](#) in Support of Respondents, *Department of Homeland Security v. Regents of the University of California* (2019).

³ Gándara, Patricia, and Jongyeon Ee. "[Schools under Siege: The Impact of Immigration Enforcement on Educational Equity](#)," *Harvard Education Press* (2021).

⁴ Kaushal, Neeraj, Julia Shu-Huah Wang, and Xiaoning Huang. "State dream acts and education, health and mental health of Mexican young adults in the US." [Economics & Human Biology 31 \(2018\): 138-149](#);

⁵ Venkataramani, Atheendar S., Sachin J. Shah, Rourke O'Brien, Ichiro Kawachi, and Alexander C. Tsai. "Health consequences of the US Deferred Action for Childhood Arrivals (DACA) immigration programme: a quasi-experimental study." [The Lancet Public Health 2, no. 4 \(2017\): e175-e181](#). See also Patler, Caitlin, and Whitney Laster Pirtle. "From undocumented to lawfully present: Do changes to legal status impact psychological wellbeing among latino immigrant young adults?." [Social Science & Medicine 199 \(2018\): 39-48](#).

⁶ Giuntella, Osea, Jakub Lonsky, Fabrizio Mazzonna, and Luca Stella. "Immigration policy and immigrants' sleep. Evidence from DACA." [Journal of Economic Behavior & Organization 182 \(2021\): 1-12](#).



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Multi-generational Impacts on Families

- The new book by CRP co-director (Gándara & Ee, 2021, cited above) presents comprehensive findings on the disruptive impact that immigration enforcement activities have on more than six million K-12 students in the U.S. Most of these students are documented but are terrified that e.g., a parent or older sibling who is not documented will be subject to detention and/or deportation. This ever-widening circle of students and family members will benefit from a strengthened DACA program, as DACA can serve as a bulwark against student stress, disengagement and absenteeism in schools and parental disengagement from their children's education, trends that are more acute in poorly funded school districts with high proportions of English language learners. (Gándara & Ee, 2021)
- New research by Hamilton et al. (2021) carefully examines birth records from mothers just above and below the DACA upper age cutoff, and finds, "DACA was associated with improvements in the rates of low birth weight and very low birth weight ... among Mexican immigrant mothers."⁷
- Abrego's 2018 study based on in-depth interviews with DACA recipients and their relatives in the Los Angeles area found, "DACA benefited families in mundane but cumulative ways. Even seemingly minimal changes like driver licenses and access to spaces and services that require state ID made life notably easier for Latino young adults and their families in Los Angeles."⁸

Better Labor Market Opportunities and Complex Tradeoffs with Higher Education

- Numerous studies confirm that an essential benefit of DACA is to improve labor market prospects of DACA recipients by expanding "above the table" work opportunities – in some studies this is captured in simple measures like reduced unemployment and better wages, while other studies confirm that DACA facilitated recipients finding jobs that are experienced as a better "fit" and more satisfactory even at similar wage levels (Pope 2016; Wong et al., 2020; Hamilton et al. 2021, cited above).⁹

⁷ Hamilton, Erin R., Paola D. Langer, and Caitlin Patler. "DACA's Association With Birth Outcomes Among Mexican-Origin Mothers in the United States." [Demography 58, no. 3 \(2021\): 975-985.](#)

⁸ Abrego, Leisy J. "Renewed optimism and spatial mobility: Legal consciousness of Latino Deferred Action for Childhood Arrivals recipients and their families in Los Angeles." [Ethnicities 18, no. 2 \(2018\): 192-207.](#)

⁹ Pope, Nolan G. "The effects of DACAmentation: The impact of Deferred Action for Childhood Arrivals on unauthorized immigrants." [Journal of Public Economics 143 \(2016\): 98-114](#); Tom K. Wong et al., [2020 National DACA Study](#) (Oct. 2020), survey for the Center for American Progress; Hamilton, Erin R., Caitlin Patler, and



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- Because DACA significantly changes the breadth and quality of job opportunities for recipients, in combination with the temporary nature of the DACA program fostering a short planning horizon, some studies find that DACA recipients tend to choose work over continued enrollment in higher education, though this is less so at the community college level than at four-year colleges (Hsin & Ortega, 2018; Amuedo-Dorantes & Antman 2017).¹⁰ Other studies find DACA has more positive impacts on college attendance (Kuka et al., 2020; Ballerini & Feldblum 2021, p. 165; Wong et al., 2020, cited above).¹¹ The mixed nature of the research evidence about college enrollment points to the importance of more comprehensive legislative solutions (e.g., Dream Act) that foster better long-term planning and human capital investment patterns and choices (Kuka et al., 2018, cited above) It also points to state-level policy differences (California, Texas, New York, etc.) and heterogeneity among undocumented students by race/ethnicity, immigration histories and other factors (Hsin & Reed 2020).¹²
- It is estimated that there are approximately 9,000 DACA recipients working as teachers in the U.S. and another 14,000 working in health-care practitioner and related support jobs (Migration Policy Institute, 2017¹³), including an estimated 8,600 DACA health care workers in California (public comment by UC President & Chancellors¹⁴). Teacher and health care worker shortages have become more strained during the COVID-19 pandemic, and the removal forbearance

Robin Savinar. "Transition into liminal legality: DACA's mixed impacts on education and employment among young adult immigrants in California." [Social Problems 68, no. 3 \(2021\): 675-695.](#)

¹⁰ Hsin, Amy, and Francesc Ortega. "The effects of deferred action for childhood arrivals on the educational outcomes of undocumented students." [Demography 55, no. 4 \(2018\): 1487-1506.](#); Amuedo-Dorantes, Catalina, and Francisca Antman. "Schooling and labor market effects of temporary authorization: Evidence from DACA." [Journal of population economics 30, no. 1 \(2017\): 339-373.](#)

¹¹ Kuka, Elira, Na'ama Shenhav, and Kevin Shih. "Do human capital decisions respond to the returns to education? Evidence from DACA." [American Economic Journal: Economic Policy 12, no. 1 \(2020\): 293-324.](#); Ballerini, Victoria, and Miriam Feldblum. "Immigration Status and Postsecondary Opportunity: Barriers to Affordability, Access, and Success for Undocumented Students, and Policy Solutions." [American Journal of Economics and Sociology 80, no. 1 \(2021\): 161-186.](#)

¹² Hsin, Amy, and Holly E. Reed. "The Academic Performance of Undocumented Students in Higher Education in the United States." [International Migration Review 54, no. 1 \(2020\): 289-315.](#)

¹³ Zong, Jie, Ariel G. Ruiz Soto, Jeanne Batalova, Julia Gelatt, and Randy Capps. "A profile of current DACA recipients by education, industry, and occupation." [Migration Policy Institute fact sheet](#) (Nov. 2017). See also NPR All Things Considered, [Nearly 9,000 DACA Teachers Face An Uncertain Future, January 29, 2018.](#)

¹⁴ DACA public comment by UC President Michael Drake et al., posted at [regulations.gov](#) on November 23, 2021 (USCIS-2021-0006-9078).



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and work authorization provisions of DACA are critical to ensure the health of all Americans and the quality education of children in the U.S. (see *also* public comment by UC Irvine’s Teacher Education Program¹⁵; public comment by UC President & Chancellors, cited above).

- In addition to DACA facilitating better integration into the fabric of American society, as DHS considers the costs and benefits in the final regulations, it is notable that the improved labor market prospects of DACA recipients are estimated to result in billions of dollars in net federal and state tax revenues over the next decade (Brannon & McGee 2020, 2021).¹⁶

II. Methodology and policy concerns with age/residency restrictions in the NPRM—CRP highlights need for reform in final DACA regulations

DHS invited public comment on how the final rule might incorporate better data estimates of the DACA population (see p. 53786), including DHS acknowledging that the NPRM methodology makes limiting assumptions including these two related choices that are the focus of this public comment by the CRP:

“[T]he methodology assumes that the active DACA population again will grow at the same rate that it did in FY 2015-FY 2017, just a few years after the Napolitano Memorandum was first issued.” The methodology does not account, for instance, for the fact that when the Duke Memorandum was issued, the growth rate had been declining, or for the fact that potential DACA requestors will stop “aging in” to the policy in June 2022, when the youngest possible requestor reaches 15 years of age.” (p. 53786)

It is true that DHS data show that the active DACA population grew from 652,530 in FY 2015 to 700,572 in FY 2017 (NPRM p. 53785, Table 7) before leveling off and then declining, but this growth was due to a combination of DACA age/cohort factors that are highly unlikely to be repeated in the near-term future, with the implication that DHS is adopting methodological assumptions that appear to be unsound.

¹⁵ DACA public comment by UC Irvine School of Education Dean Richard Arum et al., posted at regulations.gov on November 16, 2021 (USCIS-2021-0006-7063).

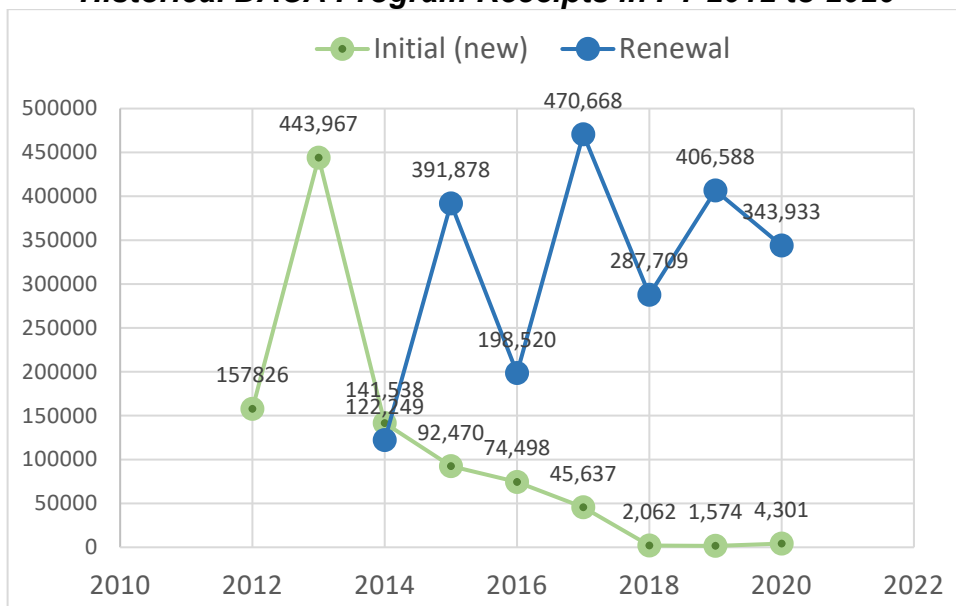
¹⁶ Brannon, Ike, and M. Kevin McGee. “The Costs of Closing DACA Initial Enrollments.” [Regulation 43 \(2020\):30-34](#); Brannon, Ike, and M. Kevin McGee. “Estimating the Economic Impact of the 2021 Dream Act” [SSRN working paper](#) (2021).



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One aspect of the NPRM data that underscores the CRP’s concern is the historical data on program request receipts (i.e., the population going through the application process) at Table 9 (p. 53787) reproduced in the chart below. These data confirm that initial/new intakes, after surging in FY 2013 shortly after DACA started, declined consistently between FY 2014 and FY 2016 even before the Trump Administration’s announced decision to rescind DACA had a further profound chilling effect on new intakes in FY 2018-20. The growth in the overall active DACA population in FY 2015-17 was overwhelmingly dependent on renewals (with the two-year renewal period, the initial surge in DACA receipts in FY 2013 corresponds with a sawtooth pattern in the chart, with high renewals in FY 2015 and then a peak in FY 2017).

Historical DACA Program Receipts in FY 2012 to 2020



Source: NPRM, 86 Fed. Reg. at 53787 table 9 (Sept. 2021)

The multi-year pattern of decline in initial/new DACA intakes after FY 2014 (which contributed to a plateau in the overall DACA population in 2017 and 2018 then decline in 2019 and 2020) is substantially related to the practical effects of the two threshold criteria in DACA--that the requestor has “continuously resided” in the U.S. since June 2007 and that the requestor has been “physically present” in the U.S. since June 2012 (pp. 53739, 53766). Each year, the “continuously resided” requirement in particular has been gradually choking off more and more of the pipeline of undocumented young people from DACA eligibility, until finally, as DHS acknowledges, by June of 2022 all those age fifteen will be ineligible for DACA in the NPRM because of the requirement to have continuously resided in the U.S. since June 2007 (p. 53587). Likewise, by June of 2022 all those age seventeen who came to the U.S. when



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they were age two will be completely ineligible for DACA, as will all those age twenty who came to the U.S. at the age of five, and so on. These facts contrast with historical patterns, in which well over half of all DACA recipients approved in 2012-18 first entered the U.S. when they were between the age of 2 and 8 (Congressional Research Service 2021, p. 13 fig. 3¹⁷).

Another data point reinforcing this concern with the NPRM is that the latest USCIS figures show a marked shift compared to 2013-16, when new DACA intake requests/applications the most common age (the mode) was fifteen, and in 2016 those age fifteen outnumbered *by a 11:1 ratio* new DACA intakes from those age twenty. But once DACA intakes started to pick up again in FY 2021 after the Supreme Court ruling in *DHS v. Regents of the University of California*¹⁸ and the change over to the Biden administration, there were more than twice as many intakes from twenty-year old's (an older population that already met the "continuously resided" DACA threshold requirement) as from those age fifteen (i.e., the new cohort of potentially "aging in" students) (see USCIS 2021; Kidder forthcoming 2022¹⁹).

While it is the case that in FY 2021 through late July initial/new DACA intakes bounced back to 89,605 (NPRM p. 53785 n. 347), this reflected the precarity and pent-up demand resulting from the previous administration's freezing of new DACA approvals (and corresponding negligible DACA initial intakes) for three years in FY 2018 to FY 2020. A plausible interpretation (seemingly more plausible than the alternatives) is to view FY 2021 intakes as a miniature version of the one-year spike in new intakes that occurred back in FY 2013 (see chart above), with the FY 2021 version conditioned by the facts on the ground about just how much the eligibility pool of new DACA intakes was shrinking due to the march of time and the restrictive impact of the threshold requirements that one must have "continuously resided" in the U.S. since June 2007 and be "physically present" in the U.S. since June 2012 (discussed further below regarding the need to reform these criteria in the final regulations).

As confirmed in the National Academies' 2017 consensus report on immigration, age distribution effects are one of the most important factors to carefully account for when attempting to model immigration-related population trends and associated fiscal impacts

¹⁷ Congressional Research Service, [Deferred Action for Childhood Arrivals \(DACA\): By the Numbers](#) (April 2021).

¹⁸ 140 S.Ct. 1891 (2020).

¹⁹ USCIS, Form I-821D, Consideration of Deferred Action for Childhood Arrivals Count of Receipts of I-821D Initials by Age and Fiscal Year Received August 15, 2012 to August 27, 2021; William C. Kidder, *Dreaming with Dreamers when DACA is at Risk: An Innovative and Legally Defensible Student-Community Partnership Model to Bolster Financial Support for Undocumented College Students*, 36 Georgetown Immigration Law Journal ___ (forthcoming Winter 2022).



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(National Academies 2017, pp. 91, 328, 360²⁰). For these reasons, the DHS methodology in the NPRM at Table 8 (p. 53786) that projects annual growth in the active DACA each year between now and FY 2031 is dubious and foreseeably errs in the direction of overstating growth in the DACA population in the years to come by downplaying the modeling implications of the fast-approaching DACA age ineligibility cliff.²¹ Likewise, the related DHS estimates of projected DACA initial/new program receipts of 153,529 in FY 2021 and FY 2022, 70,868 in FY 2023 and 50,254 in FY 2024 (NPRM Table 10, p. 53788) are implausible because of the way the estimates have been decoupled from the objective reality of the present and future impacts of the DACA age ineligibility cliff. Stated differently, even if DHS has a preference to organize the contours of the final DACA regulations around the FY 2021-31 estimated population above for fiscal or other reasons, there is significant room to do so and expand and modify the program eligibility rules in the manner described below if DHS adopts more empirically responsible and internally consistent DACA modeling estimates.

Concerns with the DACA threshold requirements that one must have “continuously resided” in the U.S. since June 2007 (and also the “physically present” in the U.S. since June 2012 requirement) is not simply a data methodology problem. Rather, it points to an **important discretionary policy choice by DHS that the CRP strongly urges be addressed and remedied in the final regulations**. President Biden directed that the DHS Secretary “shall take all actions he deems appropriate, consistent with applicable law, to preserve and fortify DACA²²” but the NPRM draft regulations fail to live up to the spirit of this direction by ossifying (rather than meaningfully fortifying) aspects of the 2012 DACA memo.

While any program similar to DACA cannot entirely avoid the arbitrariness of an age cutoff or similar rule, the DHS NPRM approach of freezing (rather than modernizing) the original “continuously resided” requirement from the DHS DACA memo from nine years ago will result

²⁰ Francine D. Blau & Christopher Mackie, eds. 2017. [The Economic and Fiscal Consequences of Immigration](#). National Academies of Sciences, Engineering, and Medicine. Washington, D.C.: The National Academies Press.

²¹ This is so even if one makes rather generous assumptions about the future impact of the NPRM proposal to make optional the \$410 DACA component for work authorization, Form I-765 ([an idea CRP supports](#)). Here we simply note that DHS’s modeling that the group declining the work authorization fee will comprise “30% of the projected population” (p. 53792) of this change is conjectural and is perhaps too optimistic, including for age cohort reasons connected to the other points made in this public comment. Namely, under realistic modeling scenarios it is the older DACA eligible individuals obtaining renewals who are doing most of the “heavy lift” in constituting the DACA active population, but the older end of the DACA eligibility age distribution is likely more in need of work authorization (and thus more likely to pay the \$410 fee component) when compared to DACA-eligible teenagers.

²² [President Biden memorandum to the Attorney General and Secretary of the Department of Homeland Security](#) (Jan. 20, 2021).



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in a dramatic difference in how the younger end of the Millennial Generation and older end of Generation Z were treated in comparison to the upcoming total exclusion from DACA eligibility faced by Dreamers in the younger end of Generation Z. This creates a situation that parallels the Supreme Court's concern with school-age undocumented students in *Plyler* that the "existence of such an underclass presents most difficult problems for a Nation that prides itself on adherence to principles of equality under law" and would impose "a lifetime hardship on a discrete class of children" (*Plyler v. Doe*, 457 U.S. 202, 219, 223 (1982)).

DHS should also be concerned that its NPRM age rule that would entirely exclude younger Generation Z undocumented students amounts to an "unforced error" that will generate bitterness and disillusionment among this population of young people who have lived most of their lives in the U.S. (particularly those who witnessed their older siblings and neighbors in the community rely upon DACA and then partake in the economic and human dignity-affirming benefits of DACA that would now be placed beyond their reach).

DHS has pledged to consider hard-to-quantify benefits including "(1) a reduction of fear and anxiety for DACA recipients and their families, (2) an increased sense of acceptance and belonging to a community, (3) an increased sense of family security, and (4) an increased sense of hope for the future." (NPRM pp. 53796-53797) In carrying out this important policy analysis, we urge DHS to consider **the CRP's recommendation that the better approach for the final regulations**—which has the same practical meaning today as the "continuously resided" date of June 2007 and the "physically present" date of 2012 had when DACA was created in 2012—is that a **DACA requestor meet the threshold criteria of having "continuously resided in the U.S. for a minimum of five years prior to their initial DACA filing and have been physically present in the U.S. at the time of their DACA filing."**

A somewhat less preferred alternative (though still far better than the NPRM proposed approach) would be to move forward these two dates anchored to the date of the final regulation (e.g., a "physically present" date of January 2017 if the regulations are issued in January 2022), and then state in the text of the regulations that the threshold residency/present dates will be updated and moved forward at a set interval (e.g., every year or two years).

The CRP's recommendation to modify the NPRM in the manner described above is consistent with the fact that for this rulemaking process, [Executive Order 13563](#) emphasizes, "Where appropriate and permitted by law, each agency may consider (and discuss qualitatively) values that are difficult or impossible to quantify, including **equity, human dignity, fairness, and distributive impacts.**" (bold added) Likewise, [Executive Order 12866](#) directs that "in choosing among alternative regulatory approaches, agencies should select those approaches that **maximize net benefits** (including potential **economic,**



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environmental, **public health** and safety, and other advantages; **distributive impacts; and equity**), unless a statute requires another regulatory approach.” (bold added) Thank you for your consideration.

Respectfully submitted,

Patricia Gándara, Ph.D.
Research Professor & CRP Co-Director

Gary Orfield, Ph.D.
Research Professor & CRP Co-Director

William Kidder, J.D.
CRP Research Associate (volunteer)
(signing in my personal capacity)

*The CRP is available to comment further on the proposed DACA rule if requested to do so by DHS; our contact information is at <https://www.civilrightsproject.ucla.edu/>.