November 25th, 2021

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, Comments in Response to Deferred Action for Childhood Arrivals

On behalf of Southern Connecticut State University, I submit this comment letter in response to the U.S. Department of Homeland Security’s (Department) proposed rule, Deferred Action for Childhood Arrivals (DHS Docket No. USCIS-2021-0006), published September 28, 2021. I write in support of the proposed rule to strengthen and fortify the DACA program.

Located in New Haven, CT, our state is home to well over 11,000 DACA and DACA-eligible students, many of whom we serve here at Southern. These individuals (students, staff, and faculty-alike) are a vibrant part of our campus community and proudly represent our Social Justice and Anti-Racist mission.

Southern has taken many steps to ensure a fair, just, and equitable experience for our undocumented students. These actions have included the creation of an endowed scholarship, the revision of our admissions documents to assure we provide necessary protections for undocumented students from potential harm, the creation of a campus-wide syllabus statement declaring our university’s commitment to educating and protecting immigrant students, as well as the persistent advocacy to campaign at our State Legislature for expanded access to institutional financial aid for all undocumented students in Connecticut. These achievements serve to provide students and faculty alike with necessary engagement that focuses on conversations about immigration.

According to our own institutional data, the number of undocumented students matriculating into our programs has steadily increased over the past decade. As President of Southern, I can attest to the valuable contributions our immigrant students make to our campus community, as well as to the local, regional, and national communities they join after leaving our institution. The approval of the new rule is critical to our Social Justice mission as an institution and to our
students. As a public regional comprehensive university of about 8,000 students, we embrace an identity of inclusive accessibility, and assert our unwavering support that the proposed rule concerning the DACA program be codified. We write to you on behalf of those students we know so well, many of whom will benefit in immediate, tangible ways from the passing of the new regulation.

Among our many strengths, Southern Connecticut State University is particularly proud of its teacher preparation programs. Southern is on the vanguard of pushing Connecticut’s goal of employing minority educators at a rate of 10% by 2021. This, however, coincides with a severe teacher shortage in the state which has a direct impact of our undocumented students. Without DACA-protections, these students may experience unnecessary difficulty challenges to pursue careers in education. There is a great need to increase the number of minority teachers in our state to reflect our diverse population demographic. Creating easier pathways to gaining DACA status will have an immediate positive impact on the number of teachers we are able produce, and by extension, the number of students in Connecticut schools able to learn from teachers who share their cultural perspective and life history. This new rule could bring us closer to that goal.

Southern is also a leader in Connecticut in preparing students to work in the fields of healthcare. The COVID-19 pandemic has created a shortage of healthcare workers nationwide. It is our goal to prepare our students with a full and adequate education in healthcare sciences to meet these challenges. We have a community of immigrant students on our campus who are eager to become healthcare providers. The impact that these talented students would bring to their respective communities is undeniable. We hope that approval of the new proposed DACA regulation will provide pathways for our graduates to be able to serve areas of critical need in our state.

We are immensely proud of our DACA alumni, K-12 educators, and business owners. We cannot emphasize enough how our DACA students have contributed to the vibrancy of campus life while they were students at our institution, and how they have consistently continued to do so in their lives as professionals once they have graduated.

We appreciate your willingness to learn about our advocacy work, and more importantly, of the contributions of our immigrant students. Please strengthen and fortify the DACA program through the proposed DACA regulation currently under consideration.

Sincerely,

President Joe Bertolino
Southern Connecticut State University