Submitted via 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

November 17, 2021

Re: DHS Docket No. USCIS-2021-0006, Comments in Response to Deferred Action for Childhood Arrivals

On behalf of Mount Holyoke College in South Hadley, MA, I submit this comment letter in response to the U.S. Department of Homeland Security’s 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 and offer further thoughts to strengthen and fortify the DACA program.

According to the Migration Policy Institute, Massachusetts is home to 4,900 DACA recipients and an estimated 15,000 individuals immediately eligible for DACA protection. Mount Holyoke College is proud to welcome DACA recipients as prospective students and among our student body. Mount Holyoke joins with the Presidents’ Alliance on Higher Education and Immigration and other advocacy organizations in supporting DHS’s decision to enshrine DACA and associated procedures into regulation, in supporting the continued existence and administration of DACA, and in advocating for other measures to strengthen procedures relating to DACA. Among these, we support splitting DACA status from employment authorization; removal of the prior unlawful immigration status requirement; removal of current barriers to DACA, including the age cap; and the expansion of grounds for advance parole for DACA applicants.

Additionally, Mount Holyoke supports the recommendations to improve DACA as put forward by the Presidents’ Alliance in their January 6, 2021, letter to Secretary Mayorkas.

As Mount Holyoke President Sonya Stephens has written:

DACA has proven itself to be of significant benefit not only to hundreds of thousands of students, but also to the nation as a whole. The program provides access to educational and employment opportunities for students, while building pathways for them to pursue the American dream. In the process, they become fully engaged contributors to the

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economies and communities in which they live and work and demonstrate their
dedication to this country and its ideals.

At Mount Holyoke College, our mission is to draw students from all backgrounds into an
exceptionally diverse and inclusive learning environment and to prepare them for
purposeful engagement in the world. Our community is enriched by the experiences and
intellectual contributions of talented DACA students who must often overcome great
obstacles and demonstrate significant perseverance to pursue their studies and their
goals. These committed young people need your support and assistance to remain in the
country they know as home, and to fulfill their potential here.

Thank you for your consideration.

Sincerely yours,

Kevin McCaffrey
Director of Government and Community Relations
Mount Holyoke College