



November 29, 2021

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

Re: DHS Docket No. USCIS- 2021-0006

Dear Acting Chief Strano:

On behalf of the New York University (NYU) community, I am submitting the following comments in response to Department of Homeland Security (DHS) Docket Number USCIS-2021-0006 regarding the Notice of Proposed Rulemaking (NPRM) on Deferred Action for Childhood Arrivals (DACA). We appreciate the actions taken by the Biden Administration and DHS to protect and fortify this essential program that has allowed so many talented and qualified students to remain in the United States after being brought to the country as young children.

NYU and universities throughout the country have encouraged students of all ethnic and economic backgrounds to pursue higher education and the DACA program has allowed these young people to pursue just such educational opportunities in a wide variety of disciplines and fields. The result has been thousands of young people actively contributing to the nation by volunteering, working, paying taxes and strengthening the social fabric of their communities. It makes little sense to limit the ability of these students to reach their highest potential in the country in which they have spent their entire lives.

Throughout its rich history, New York City owes much of its growth and character to the contribution of immigrant communities. The DACA-eligible students and administrators within the NYU community have earned their place by dint of their talent, their drive, and their hard work. They enliven our classrooms and laboratories, and contribute greatly to campus life. They are our proteges, our mentees, our colleagues, and our friends. Surely it aligns with our national ideals to fortify this established program that has successfully protected a group of young people that have done nothing other than accompany their parents to the U.S., which, in turn, became the only homeland many have ever known.

We respectfully urge DHS to carefully consider the response submitted by the American Council on Education (ACE). The ACE comments reflect what the broader higher education community wishes to see the DACA program evolve into, beyond the program as established in June 2012 -- with the primary goal being to fortify the program to provide a level of certainty for DACA-eligible individuals so that they can plan their lives.

In particular, I would like to highlight a few key points included in the ACE comments. We respectfully urge to DHS to:

- Use the rulemaking as an opportunity to strengthen the DACA program along the lines suggested above.
- Make explicit that DACA-eligible students are eligible for Title IV federal student aid programs such as Pell Grants, Supplemental Educational Opportunity Grants and Federal Work Study.
- Make clear that the program will start accepting and approving new DACA applications.
- Make explicit that the final rule allows for advance parole, which would allow DACA recipients to leave and then be able to legally re-enter the U.S.

While policymakers and politicians have been unwilling or unable to enact permanent legal protections (most unfortunately from our point of view) for this population, a strong and fortified DACA program can offer beneficiaries cautious hope that they can be part of this country's ever-unfolding story as a land of opportunity and progress.

As a life-long educator, as an immigrant myself, and simply as a father who can imagine the devastating impact of DACA's expiration on a family -- on behalf of the NYU community -- I applaud DHS and the Biden Administration for initiating this rulemaking to make the final rule as strong and effective as possible. Thanks for your consideration.

Sincerely,



Andrew Hamilton  
President  
New York University