



EVERY TEXAN

Formerly Center for Public Policy Priorities

Comments on the Continued Importance of Keeping DACA in Place

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Samantha Deshommes
Chief, Regulatory Coordinator Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security

Re: Comment in Response to the DHS/USCIS Notice of Proposed Rulemaking (NPRM) Deferred Action for Childhood Arrivals; CIS NO. 2691-21; DHS Docket No. USCIS-2021-0006; RIN 1615-AC64

To whom it may concern:

Every Texan issues the following comment in response to the Department of Homeland Security's (DHS) notice of proposed rulemaking (NPRM) published on September 28, 2021, for Deferred Action for Childhood Arrivals (DACA).

At Every Texan, we believe at our core that social justice requires public policy while envisioning a Texas where people of all backgrounds – including DACAmented and undocumented immigrants - can fulfill their potential and contribute to our community. We are a team of dedicated, accomplished policy experts with thorough knowledge and expertise of Texas public policy and advocacy working to strengthen public policy for expanded opportunity and equity for every Texan.

Every Texan and our staff strongly support USCIS' intent to preserve and fortify DACA through this formal rulemaking. DACA is a critical program that has benefitted the lives & well-being of thousands of immigrants across Texas along with their families, loved ones, and communities. While this is a necessary and urgent step to codify DACA in federal agency rules, we also urge USCIS to take further steps to strengthen these protections which remain unattainable by too many who do not fit the rigid categories implemented nearly a decade ago.

Our nonprofit organization works primarily in the policy areas of health care, food security, education, jobs & financial security, budget & taxes, and equity & inequality. Our analysts agree that each of these facets of public policy and public life are improved on both an individual and collective basis by the existence and continuation of DACA as a program empowering qualifying immigrants with the essential opportunities to both fulfill their dreams and achieve their life goals along with the access to provide for themselves and their families. DACA allows granted

individuals and their dependents much greater access to health care via work benefits and reduced risk of food insecurity, leading to a healthier Texas. In Texas, DACAmented individuals can attain driver's licenses that fully undocumented immigrants are barred from, leading to more transportation opportunities and safer, more insured roadways. In every aspect, DACA strengthens our country, benefits our communities, empowers our young people, and brightens our future.

DACA has made so many more opportunities attainable for qualifying immigrants, but increasingly more are finding themselves ineligible given the aging eligibility requirements that have not been updated since the program's inception. Unless these requirements are updated and remedied – such as implementing a higher age limit for first-time applicants and a later entry date into the United States – and unnecessary restrictive criminal bars eliminate, fewer people will be eligible for DACA each year. The final ruling on a DACA application should also require notice and a chance to respond before any DACA grant is terminated.

Thank you for your consideration of this comment. Please contact me to provide any additional information you might need. I look forward to your response.

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