



November 23, 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

Dear Acting Chief Strano:

In collaboration with Communities for Our College and the equity committees for the Association for College Trustees and the Washington Association for Community and Technical Colleges, the Washington State Board for Community and Technical Colleges (SBCTC) submits this comment letter in response to the U.S. Department of Homeland Security's proposed rule, Deferred Action for Childhood Arrivals (DACA), DHS Docket No. USCIS-2021-0006, published September 28, 2021. We write in support of the proposed rule and would like to associate ourselves with recent comments submitted by the American Association of Community Colleges. SBCTC strongly supports the intent to preserve and strengthen DACA through this rulemaking as DACA provides foundational support for many of our students' in reaching their career and life goals through higher education.

SBCTC represents the 34 two-year community and technical colleges in Washington State that offer opportunities for over 367,000 students each year to finish their high school diploma or get their GED, receive hands-on training to go straight to work, and/or get their 2-year and 4-year degrees. We are affiliated with the nearly 1,200 community colleges across our nation whose open-door mission plays a key role in ensuring access to college for many first-generation, low-income, students of color.

According to the Migration Policy Institute, Washington State is home to 14,740 DACA recipients and an estimated 30,000 individuals are immediately eligible for DACA protection¹. SBCTC has an established history of supporting DACA and advocating for providing a path to citizenship for our "Dreamers." DACA recipients are not just our students – they are our colleagues, neighbors, family, and friends. Our colleges are proud to welcome DACA recipients and are dedicated to supporting the many immigrants, refugees, and asylum seekers within our student body and our surrounding communities.

As engaged higher education leaders and community members, we bear witness to the value and power of the DACA program. We are pleased that the proposed rule includes the critical concepts of equity, dignity, and fairness as essential considerations. These important ideals are aligned with our system vision for "leading with racial equity" and ensuring "racial, social, and economic justice" for our students.

On behalf of Washington State's community and technical colleges, we are grateful for this Administration's efforts to propose regulations that support and strengthen the DACA program. Our federal priorities will continue to be

focused on establishing a path to citizenship for qualifying undocumented students and providing access to federal aid, as well as protecting Dreamers from deportation and establishing pathways to permanent legal status.

Notwithstanding its strong support for DACA and the proposed rule, SBCTC believes that the proposed rule can be improved to better protect DACA participants and to better realize the benefits of the program. In particular, SBCTC believes the date- and age- based eligibility criteria should be modified to reach otherwise-eligible individuals who were brought to the United States as children and who have built their lives in this country, but who are not eligible under the current program and proposed rule.

Likewise, SBCTC is concerned that the mandatory application fees for DACA and work authorization impose too significant a burden upon DACA participants, and should be lowered and/or subject to need-based waivers. The proposed rule would assess \$85 in fees to submit a Form I-821D Consideration of Deferred Action for Childhood Arrivals application, and \$410 in fees to submit a form I765 Application for Employment Authorization. The proposed rule does not provide for any opportunity for an individual to seek a waiver of these fees. These fees impose a serious burden on DACA-participant members of Washington's community and technical college system.

We stand ready to advance legislative effort to extend the full protection of citizenship to our Dreamer colleagues, neighbors, family, and friends. Our community and technical college system will continue to open our doors and hearts to the rich diversity of students we serve and we stand firmly with our students in supporting their dreams.

Sincerely,

Jan Yoshiwara
Executive Director
Washington State Board for Community and Technical Colleges

Fernando Mejia-Ledesma
Organizer
Communities for Our Colleges

Dr. John Mosby
President
Highline College

Dr. Julie White
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Pierce College

Paul Speer
Trustee
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Rich Fukutaki
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1 "Deferred Action for Childhood Arrivals (DACA) Data Tools," MPI, accessed Nov. 22, 2021, <https://www.migrationpolicy.org/programs/data-hub/deferred-action-childhood-arrivals-daca-profiles>

