



11/23/2021

Submitted via [www.regulations.gov](http://www.regulations.gov)

U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW  
Washington, DC 20529-2140

RE: Comments on Proposed Regulation – Deferred Action for Childhood Arrivals  
(DHS Docket No. 2021-000)

Dear Sir or Madam:

I am writing on behalf of The Healing Trust and the grantee partners that it supports. The Healing Trust is a private foundation that funds over 80 nonprofits serving 40 counties in Middle Tennessee that focus on advocacy, physical health, mental health, recovery from alcohol and drug abuse or healing from abuse, neglect, and violence. Since our inception, we've distributed more than \$100 million in grants to nonprofits that serve people who are uninsured or underinsured, including DACA recipients.

While we support that the Department of Homeland Security's (DHS) proposed rule, "Deferred Action for Childhood Arrivals," DHS Docket No. 2021-0006," aims to "preserve and fortify" the Deferred Action for Childhood Arrival (DACA) policy, we do not believe it goes far enough to actually strengthen it. As a dedicated supporter of the policy and its recipients, we strongly encourage DHS to reinforce the proposed rule by ensuring that both deferred action and work authorization remain connected in the policy, which DHS acknowledges to be an effective program to help undocumented immigrants live and work in the only country they've ever called home.

In addition to the raw statistics supporting protecting DACA recipients, we believe it would be a significant loss for family members, loved ones, communities, classrooms, nurses, farmworkers and so

many more if DACA recipients no longer have at least a temporary relief from deportation as well as access to work authorization. No one should have to live with the legal uncertainty of losing protections from deportation or the practical uncertainty of whether one can feed him or herself and family.

DHS must take steps to improve the proposed rule to better protect DACA recipients from uncertainty and legal limbo, but as this proposal-- which was published by an administration that maintains it supports undocumented immigrants-- shows, the DACA policy does not resolve the day-to-day limbo experienced by DACA recipients. Congress must immediately provide permanent relief to the millions of undocumented people who call the U.S. home. It's time for President Biden and Congress to deliver a pathway to citizenship for undocumented youth, farmworkers, and essential workers, as well as those granted Temporary Protected Status. Because their home is here.

Sincerely,

Kristen Keely-Dinger  
President and CEO of The Healing Trust