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National Partnership for New Americans
1818 South Paulina Street
Chicago, IL 60608
www.partnershipfornewamericans.org

The Honorable Elaine C. Duke
Acting Secretary of Homeland Security
Washington, D.C., 20528

September 11, 2017

Dear Acting Secretary Duke,

We are writing to express our profound disappointment at the administration's decision to rescind the Deferred Action for Childhood Arrivals (DACA) program and to urgently request a meeting. Although we deeply disagree with the decision to terminate DACA, we write about one aspect in the implementation of this decision. At NPNA we believe that the decision to require all DACA recipients whose permission expires in the next six months to have their renewal submitted by October 5 is a deadline that is arbitrary, unworkable, and cruel. It will result in tens of thousands of current DACA holders losing their legal status, protections from deportation, and ability to work legally and contribute to our nation. We ask to meet with you to discuss several policy recommendations concerning the implementation of this decision.

The National Partnership of New Americans (NPNA) is composed of 37 immigrant and refugee advocacy organizations across the United States with a long history of working with your department. Our members provide a range of immigrant integration services, from financial literacy and language training to workforce development and naturalization. Our mission is to promote and enhance immigrant integration economically, linguistically, socially, and civically into the fabric of our country.

As a result of the administration's decision, close to 800,000 DACA recipients now face an uncertain future. 97% of DACA beneficiaries are employed or in school, paying taxes, and contributing to our economy. Ending it will cost an estimated 700,000 jobs and over \$2 billion a year in tax revenue. It will force highly productive, skilled workers underground, harming US businesses and impoverishing our communities. This is why DACA has overwhelming support among employers, educators, political and faith leaders, and voters. The decision to rescind DACA is disruptive to our economy and devastating to these youth who have done nothing wrong.

As you know, DACA was instituted by the previous administration as a band-aid solution until Congress found the will to act. While we understand your desire to push Congress to act on this matter, relying on Congress to address the impact of the DACA rescission does nothing to address the immediate impact and significant burden of the October 5th deadline on current DACA recipients, their families and their employers and those legal and community organizations working to support them."

According to USCIS, 154,000 DACA beneficiaries have expiration dates between September 5, 2017 and March 5th, 2018. Your recent announcement gives all 154,000 of these youth until October 5, 2017 to submit their DACA renewal applications. The artificial October 5 deadline to submit 154,000 DACA renewal applications is unworkable and impractical. It will result in tens of thousands of current DACA holders missing the deadline due to lack of information, resources, or legal capacity to assist with application renewals. There are many practical reasons to extend the deadline, allowing a public information campaign to properly inform the youth of this sudden and unexpected change.

The actual effect of this Oct. 5 deadline is that there must be 5,433 applications filed every single day, including weekends, if the 154,000 current DACA holders whose permissions expire over the next six months are to be able to apply to renew their DACA. This would mean 214 applications must be filed every single hour, all night long, for 30 days. This is a very limited timeline for organizations like ours to locate and inform these DACA youth and assist them. Many DACA recipients will not have saved for the unexpected \$495 expense. The October 5 deadline is simply unworkable.

The result of this impractical deadline is that tens of thousands of DACA recipients will lose their status, their jobs, their homes, and their security and be pushed back into the shadows from which they had once proudly emerged.

In the wake of this decision NPNA respectfully requests that the Department of Homeland Security and U.S. Citizenship and Immigration Services:

1. **Meet** with NPNA leadership and immigration advocates to discuss the implementation of the policy change;
2. **Extend** the deadline for deferred action renewal to, minimally, January 5, 2018; and
3. **Inform** each DACA recipient across the country, by registered letter, of the change in U.S. policy and of registration requirements and deadlines.
4. **Establish tables** at all DHS / USCIS offices for the final week before the deadline, to receive completed DACA Applications with time stamps and receipts, to facilitate renewal submission and minimize chaos during the final crush before the deadline.

Given the devastating consequences of the October 5 deadline for DACA renewal applications we urge you to respond to these requests in an expedited manner, and look forward to engaging with you and your colleagues on this critical issue.

Respectfully submitted,

NPNA Executive Committee

Eva Millona, Executive Director, Massachusetts Immigrant and Refugee Advocacy (MIRA) Coalition;
Co-Chair, National Partnership for New Americans (NPNA)

Steven Choi, Executive Director, New York Immigration Coalition (NYIC)
Co-Chair, National Partnership for New Americans (NPNA)

Angelica Salas, Executive Director, Coalition for Humane Immigrant Rights of Los Angeles (CHIRLA)

Rich Stolz, Executive Director, OneAmerica, Washington State

Joshua Hoyt, Executive Director, National Partnership for New Americans

CC: Mr. James McCament, Acting Director, U.S. Citizenship and Immigration Services (USCIS)

CC: Ms. Veronica Venture, Acting Officer, DHS Office for Civil Rights and Civil Liberties (CRCL)

The National Partnership for New Americans advances the integration and active citizenship of immigrants to achieve a vibrant, just, and welcoming democracy for all.
www.partnershipfornewamericans.org

NPNA Member Organizations supporting this letter:

NPNA Member Organizations

1. Alabama Coalition for Immigrant Justice
2. Arkansas United Community Coalition
3. CASA (MD, PA, VA, DC)
4. Causa (OR)
5. Center for Popular Democracy (CPD)
6. Coalition for Human Immigrant Rights of Los Angeles (CHIRLA)
7. Colorado Immigrant Rights Coalition (CIRC)
8. Comunidades Unidas (UT)
9. El Centro de Igualdad y Derechos (NM)
10. Florida Immigrant Rights Coalition (FLIC)
11. Global Cleveland (OH)
12. Hispanic Interest Coalition of Alabama (HICA)
13. Illinois Coalition for Immigrant and Refugee Rights (ICIRR)
14. Junta for Progressive Action (CT)
15. Latin American Coalition (NC)
16. Maine People's Alliance
17. Make the Road (NY, NJ, PA)
18. Massachusetts Immigrant and Refugee Advocacy Coalition (MIRA) (NH, MA)
19. Michigan United
20. National Korean American Service & Education Consortium (NAKASEC)
21. Nebraska Appleseed
22. New York Immigration Coalition
23. OneAmerica (WA)
24. Pennsylvania Immigration and Citizenship Coalition
25. Progressive Leadership Alliance of Nevada
26. Promise Arizona
27. Somos Un Pueblo Unido (NM)
28. Tennessee Immigrant and Refugee Rights Coalition (TIRRC)
29. Texas Organizing Project
30. The Resurrection Project (IL)
31. Voces de la Frontera (WI)

Affiliated Immigrant Rights Coalitions

1. Consejo de Federaciones Mexicanas (COFEM) (CA)
2. Services, Immigrant Rights, and Education Network (SIREN) (CA)
3. Sunflower Community Action (KS)
4. Colorado People's Alliance (COPA)
5. Georgia Latino Alliance for Human Rights (GLAHR)
6. Idaho Community Action Network (ICAN)
7. Iowa Citizens for Community Improvement (ICCI)
8. Montana Organizing Project (MOP)

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9. New Hampshire Alliance for Immigrant Rights (NHAIR-MIRA)
10. El Centro de Igualdad y Derechos
11. Pineros y Campesinos Unidos del Noroeste (PCUN) (OR)
12. Workers Defense Project (TX)
13. WashingtonCan!
14. People's Action
15. Center for Community Change
16. Movement of Immigrants in America (MIA)



**U.S. Citizenship
and Immigration
Services**

NOV 20 2017

Ms. Eva Millona
Co-Chair
The National Partnership for New Americans
1818 South Paulina Street
Chicago, Illinois 60608

Dear Ms. Millona:

Thank you for your September 11, 2017 letter to Acting Secretary Duke. Acting Secretary Duke asked that I respond on her behalf.

The Department of Homeland Security (DHS) and its Component, U.S. Citizenship and Immigration Services (USCIS), do not plan on making any further adjustments to the Deferred Action for Childhood Arrivals (DACA) wind-down policy. With the September 5, 2017 decision to wind down DACA, DHS and USCIS made several points clear:

- 1) The DACA initial process is no longer available to individuals who did not request initial DACA on or before September 5, 2017;
- 2) The DACA renewal process is no longer available to individuals whose DACA expired before September 5, 2017, and whose properly filed renewal request was not received by that date;
- 3) USCIS will consider requests for renewal from individuals whose DACA status expires between September 5, 2017, and March 5, 2018, inclusive, and whose properly filed renewal request was received on or before October 5, 2017; and
- 4) USCIS will consider deadline extensions on a case-by case basis for DACA requests received from residents of Puerto Rico and U.S. Virgin Islands, due to the lack of communications and infrastructure for a prolonged period of time in Puerto Rico and the U.S. Virgin Islands following Hurricane Maria.

DHS has carefully reviewed the Attorney General's September 4, 2017 letter wherein he advised DHS to rescind the June 15, 2012 Memorandum, "Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children." In that letter, the Attorney General suggested that DHS should consider an "orderly and efficient wind-down process."

Eva Millona

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To ensure individuals have the information that they need, USCIS will continue to provide updates to its website when appropriate. These updates, along with archived content that may be useful, are located at <https://www.uscis.gov/daca2017>.

Thank you again for your letter and interest in this important issue. Please feel free to share this information. Should you wish to discuss this further, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "L. Francis Cissna". The signature is stylized, with the first letters of the first and last names being capitalized and prominent.

L. Francis Cissna
Director