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Department of Homeland Security

DHS Docket No. [USCIS-2021-0006](#)  
86 FR 53736

November 29, 2021

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

The Episcopal Church (“the Church”) respectfully submits this comment to the Department of Homeland Security (DHS) interim final rule, titled “Deferred Action for Childhood Arrivals” DHS Docket No. USCIS-2021-0006, in the Federal Register at 86 FR 53736, issued September 28, 2021.

The Episcopal Church has long advocated for the protection of those children who came to the United States as children, and we have a longstanding commitment to protecting the most vulnerable among us. The Episcopal Church Office of Government Relations advocates for humane immigration policies that respect the dignity and worth of every human being. We also focus on issues of global migration and its root causes, including protecting the human rights and safety of refugees by supporting the refugee resettlement work of Episcopal Migration Ministries (EMM), one of the resettlement agencies.

Advocating for the protection of undocumented immigrants who arrived to the United States as children has been a major component of this mission. The Episcopal Church recognizes these individuals, which include Deferred Action for Childhood Arrivals (DACA) recipients, as part of our churches and communities. Accordingly, we have advocated for providing them with pathways to permanent protection and maintaining the DACA program. The Church’s General Convention has called for protection for nearly 15 years:

- In 2009, the Church adopted an Act of Convention titled “[Advocate for Immigration Reform](#),” which called for supporting “the provision of conditional legal status for undocumented youth who arrived as infants and/or children and have grown up as members of our communities and schools, providing for them the opportunity to pursue higher education and/or serve the United States so they can become full contributing members of our communities and could eventually become U.S. Citizens.”
- In 2012, the Church adopted an Act of Convention titled “[Support the DREAM Act](#),” which advocated for supporting “the passing of federal legislation that presents a pathway to citizenship for undocumented youth and young adults.”
- In 2015, the Church adopted an Act of Convention titled “[Support Immigration Actions for Youth and Parents](#),” which sought “expanded immigration relief for youth and parents designed to keep families together, as outlined in the expanded Deferred Action for

Childhood Arrivals (DACA) and Deferred Action for Parental Accountability (DAPA) executive actions.”

- In 2018, the Church adopted an Act of Convention titled “[Denounce Racism Against Immigrants and Advocate for Immigration Reform](#),” sought expanded immigration relief for youth as outlined in the Deferred Action for Childhood Arrivals (DACA) … and support the passing of federal legislation that presents a pathway to citizenship for undocumented youth and young adults known as DREAMers.”

In addition to these governing documents, the Church has also made public statements and organized advocacy efforts to support DREAMERS and DACA recipients over the past many years. Providing protection for immigrant youth is a cornerstone of the Church’s efforts to create a truly humane immigration system that, in biblical terms, welcomes the stranger.

We believe that this proposed rule will uphold the Church’s commitment to this mission. Our analysis of the rule’s guiding principles based on our guiding policy documents and advocacy work has led us to support these goals:

- First, we agree with the rule’s recognition that “it is not generally the best use of those limited [enforcement] resources to remove productive young people to countries where they may not have lived since early childhood and whose languages they may not even speak.”
- We also laud the rule’s recognition that “DACA recipients, who came to this country many years ago as children, lacked the intent to violate the law, have not been convicted of any serious crimes, and remain valued members of our communities.”
- We support that DACA recipients should “have access to a process that, operating on a case-by-case basis, may allow them to work to support themselves and their families, and to contribute to our economy in multiple ways.”

Finally, we strongly agree with the regulation’s statement that only Congress can provide a permanent pathway to a green card for DACA recipients and other immigration youth. Although administrations should have the ability to issue executive actions like this proposed rule to provide protection to immigrant youth, it is not a substitute for legislation with a pathway to a green card that would provide permanent security for DACA recipients. To this end, we will advocate for legislation that provides these protections as we support this proposed rule to provide near-term relief for DACA recipients, especially those who are eligible but have not applied for this protection.

This rule aligns with our guiding principles for immigration policy and law and will receive its full support from the Church and its members.

Sincerely,

Office of Government Relations  
The Episcopal Church