

April 13, 2018

The Honorable Kirstjen M. Nielsen
Secretary of Homeland Security
U.S. Department of Homeland Security
Washington, DC 20528

Dear Secretary Nielsen:

As a result of the January 8, 2018, preliminary injunction issued in *Regents of the University of California v. Department of Homeland Security*, the undersigned higher education associations commend the decision of the Department of Homeland Security (DHS) to initiate the renewal process for current Deferred Action for Childhood Arrivals (DACA) registrants. We write today to express our support for your decision and to emphasize the importance of timely processing all DACA renewal applications. We strongly encourage DHS and United States Citizenship and Immigration Services (USCIS) to expedite the review and processing of all renewal applications and give prompt attention to submissions that have recently expired or will expire in the coming days and weeks. We also request that you convene a meeting of the Homeland Security Academic Advisory Council to discuss these and other important issues.

Following the administration's September 2017 announcement of the termination of DACA, only individuals whose protections were set to expire on or before March 5, 2018, were permitted to file renewal applications. In light of the court's order that DHS maintain the DACA program on "the same terms and conditions as were in effect before the rescission on September 5, 2017" (subject to some exceptions), it would be inequitable and unproductive to penalize through untimely action those who have already seen their DACA status expire due to the gap in renewal processing. A communication on March 7, 2018, from DHS Acting Press Secretary Houlton, encouraging DACA renewal filings, asks that "the public understand that there will be cases of DACA recipients who lose their deferred action due to violations of their terms of DACA." We urge you to prioritize renewal applications for individuals who were only recently eligible to apply for renewal post March 5, 2018, as a result of court action. We are concerned that a backlog of applications will result in the loss of protections for applicants whose two-year DACA status may soon lapse.

We also are concerned that delays in the renewal process will discourage hundreds of thousands of DACA recipients from renewing before their current protections expire. DACA recipients would benefit from your guidance and assurance that a gap in status will not jeopardize their renewal and that recipients whose status expires soon will be processed expeditiously.

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We hope that our recommendations will help DHS and USCIS fulfill its obligation to comply with the court's decision. We appreciate the challenges this matter presents to DHS and stand ready to work with you and your staff where appropriate and needed.

Thank you for considering our views.

Sincerely,



Ted Mitchell
President

On behalf of:

ACPA-College Student Educators International
ACT
American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities (AASCU)
American Association of University Professors
American College Health Association (ACHA)
American Council on Education
American Dental Education Association
APPA, Leadership in Educational Facilities
Association of American Colleges and Universities
Association of American Medical Colleges
Association of American Universities
Association of Catholic Colleges and Universities
Association of Community College Trustees
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Association of Public and Land Grant Universities
Association of Research Libraries
Coalition of Urban and Metropolitan Universities (CUMU)
College and University Professional Association for Human Resources
Consortium of Universities of the Washington Metropolitan Area
Council for Advancement and Support of Education
Council for Christian Colleges & Universities
Council of Graduate Schools
Council of Independent Colleges
EDUCAUSE
Hispanic Association of Colleges and Universities
NAFSA: Association of International Educators
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling

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National Association for Equal Opportunity in Higher Education (NAFEO)

National Association of College and University Business Officers

National Association of Colleges and Employers

National Association of Independent Colleges and Universities

National Association of Student Financial Aid Administrators

UPCEA