



**Docket ID ED-2021-OPE-0077**

November 29, 2021

Andria Strano, Acting Chief  
Office of Policy and Strategy  
Division of Humanitarian Services  
U.S. Department of Homeland Security  
5900 Capital Gateway Drive  
Camp Springs, MD 20746  
VIA [www.regulations.gov](http://www.regulations.gov)

Dear Acting Chief Strano:

On behalf of the Middle States Commission on Higher Education (MSCHE), I am pleased to submit these comments in response to the United States Department of Homeland Security's (DHS) proposed rule on Deferred Action for Childhood Arrivals (DACA), Docket Number USCIS-2021-0006.

MSCHE is a voluntary, non-governmental, membership association that defines, maintains, and promotes educational excellence across institutions with diverse missions, student populations, and resources. Recognized by the United States Department of Education as an institutional accreditor, MSCHE examines institutions as a whole rather than specific programs within institutions. MSCHE conducts accreditation and pre-accreditation activities for over 500 institutions of higher education in Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, the U.S. Virgin Islands, and other jurisdictions across the United States as well as globally.

MSCHE supports the administration's rulemaking efforts to preserve and fortify the DACA program and to appropriately focus DHS's limited enforcement resources while advancing the significant humanitarian and economic interests the DACA policy was intended to serve.

DACA has allowed young people whose undocumented status was not their choice the ability to obtain higher education degrees and pursue the American Dream. Higher education prepares these individuals to fill critical skill shortages and better positions them to support their families and make important contributions to their communities and the U.S. economy. The proposed rules would assist colleges and universities in enrolling and supporting those who meet the program's criteria and contribute to the global standing and reputation of the country's colleges and universities.

If I may provide additional information, please contact me by email at [hperfetti@msche.org](mailto:hperfetti@msche.org) or by phone at (267) 284-5026.

Sincerely,

Heather F. Perfetti, J.D., Ed.D.  
President