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Division of Humanitarian Affairs
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

November 24, 2021

Re: Deferred Action for Childhood Arrivals, Notice of Proposed Rulemaking, U.S. Citizenship and Immigration Services, DHS Docket No. USCIS-2021-0006

As leading members of the U.S. startup ecosystem—incubators, accelerators, support organizations, and companies—and as immigrants, employers, and drivers of economic growth and job creation, we write in support of the proposed rulemaking for Deferred Action for Childhood Arrivals (DACA) recipients and encourage policymakers to take further steps toward providing a pathway to citizenship for all Dreamers.

Upon finding the DACA program unlawful in July 2021, the Fifth Circuit closed the door to new DACA applicants. And although those who already had status were not affected, the ruling, and inevitable continued legal challenges, brought further uncertainty to those already legally protected.

Critics of the DACA program fail to acknowledge the benefits the program brings for all Americans. The ability to work and live in the United States is not simply an advantage for those who receive DACA protection. Rather, DACA recipients, and Dreamers more broadly, represent a vital segment of the U.S. workforce, including in critical STEM fields like medicine and engineering, and they are essential to the vibrancy of our startup ecosystem. Failing to affirm protections for Dreamers is short-sighted, and quite simply, the wrong thing to do for long-term U.S. economic growth. Reports indicate that repealing the DACA program would result in a \$460 billion loss in GDP over a decade.¹ Further, DACA recipients are employed at high levels² and have impressive rates of entrepreneurship—they launch new businesses at rates that exceed those of U.S.’ general population.³ And

¹ FWD.us, The Impact of DACA Program Repeal on American Jobs, <https://www.fwd.us/news/daca-impact-report/>.

² House Committee on Small Business, Economic Impact of DACA, Spotlight on Small Business (Feb. 2018), <https://smallbusiness.house.gov/sites/democrats.smallbusiness.house.gov/files/documents/economic%20impact%20of%20daca%20report.pdf>.

³ Tim K. Wong, et al, DACA Recipients’ Livelihoods, Families, and Sense of Security Are at Stake This November (Sept. 19, 2019), <https://www.americanprogress.org/issues/immigration/news/2019/09/19/474636/daca-recipients-livelihoods-families-sense-security-stake-november/>; *New American Economy, DACA-Eligible Entrepreneurs Earned More Than \$658.7 Million in Total Business Income in 2015* (Jan. 31, 2018), <https://www.newamericaneconomy.org/press-release/daca-eligible-entrepreneurs-earned-more-than-658-7-million-in-total-business-income-in-2015/>.

importantly, particularly amidst recovery from the COVID-19 pandemic, DACA recipients are job creators—businesses launched by DACA recipients employ an estimated 86,000 workers across the country.⁴ Many of these workers are employed at technology companies, helping to shape the next generation of products and services that cement the United States’ status as a leader in innovation.

While this rulemaking is critical, particularly in light of recent judicial activity, it must be noted that purely “preserving and fortifying” DACA is not enough to safeguard DACA recipients’ and Dreamers’ status in the U.S. Policymakers across government simply must do more, including by supporting and passing legislation that provides permanent legal protections.

Innovation is a core component of the American experience, as is the diversity of those residing in the U.S. Providing certainty for Dreamers is the right thing to do, and failing to do so sends the message to the international community that the U.S. is not a welcoming and hospitable place for talented innovators and high-skilled workers.

We urge you to continue to protect the eligibility and rights of DACA recipients, and we encourage DHS to work to more broadly provide security to all Dreamers. Doing so will ensure that the U.S. remains a leading destination for startup formation and growth.

Sincerely,

ACME AtronOmatic LLC

Allied for Startups

Arkansas Venture Center

Authentise Inc

Avventuras Ltd

Boundless Immigration

Coach.me

Cofounders Capital

Compound Eye

Crea7ive Interactive Advertising, Corp

CrowdCheck, Inc.

Digital4Startups Inc.

Founder Collective

Hacom LLC

iFixit

Indiegogo, Inc

Libib

M1PR, Inc.

MongoDB

OculoTherapy

Onfleet, Inc.

OpenGrants

PIE

Postagraph, Inc

Reddit

RevUp Capital

Sandwich.Net, LLC

ShareProgress

ThredUp Inc.

Tono Latino

Tostie Productions, LLC

UnaliWear

Upgraded Technologies Inc

Washington Technology Industry Association

Xerb

⁴ Claudia Flores and Nicole Prchal Svajlenka, Why DACA Matters (April 29, 2021), <https://www.americanprogress.org/issues/immigration/news/2021/04/29/498944/why-daca-matters/>.