



December 6, 2018

U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

RE: Comments on Proposed Regulation – Inadmissibility on Public Charge Grounds (DHS Docket No. USCIS-2010-0012)

To whom it may concern:

On behalf of the Center for Arab American Philanthropy (CAAP), I am writing to express our strong opposition to the Department of Homeland Security's Notice of Proposed Rulemaking on public charge, published October 10, 2018 in the Federal Register.

The Center for Arab American Philanthropy is the only Arab American community foundation in the country. An institution of ACCESS located in Dearborn, Michigan, CAAP's objective is to unite and empower the Arab American community by demonstrating the impact of giving together. We improve communities through grantmaking, serve donors by providing tools and resources for Arab Americans to carry out their charitable giving, build community leaders, and shape perceptions of Arab Americans by highlighting their generous heritage and exceptional contributions to society.

As an Arab American community foundation, we stand for a just and equitable world with the full participation of Arab Americans. One of our central grantmaking priorities focuses on improving the lives of immigrants and refugees. We fund many grassroots nonprofit organizations across the country that serve thousands of Arab American immigrants who rely on public support programs such as Medicaid, the Supplemental Nutrition Assistance Program (SNAP), housing supports such as Section 8 vouchers, and subsidies for Medicare Part D to reduce the cost of prescription drugs.

We stand against the proposed expansion of the public charge rule, which could negatively affect upwards of 24 million people including 9 million children. Implementing this proposed change to the public charge rule will cripple many of the nonprofits we fund in terms of their ability to provide services. The proposed rule unjustly impacts those who are taking the right steps to become legal residents and citizens, forcing them to choose between critical support benefits for their families and becoming a Legal Permanent Resident.

Further, we view the proposed public charge rule as an attack on American values that builds on institutional bias against the working poor. The Center for American Progress estimates that if the same

proposed public charge test were applied to all Americans, one in three would fail. Immigrants in fact often underutilize public benefits out of fear and lack of access to information. The proposed rule would only further this fear, not only among the families of immigrants without a green card, but those of green card holders and naturalized citizens as well. This could result in a plummet in the number of eligible people enrolled in public benefits. Public benefits should not be viewed as costs which should be discouraged, but as investments that should be promoted. As a community foundation, we witness firsthand the value that comes from investing in essential services, such as housing and health care. We see from the hundreds of grants we make annually the benefits of supporting services that allow families to stay healthy, working, educated, and contributing fully to our communities. This proposed rule seeks to undermine years of investment and progress to help immigrant families access health and social services.

Once again, the Center for Arab American Philanthropy stands against the proposed change to public charge. Immigrants make up the fabric of our country, and this rule would cause lasting damage to immigrants and their families, exacerbating racial stereotypes and income inequalities. The thousands of nonprofits, hospitals, shelters and community organizations serving immigrants will be strained, negatively impacting our communities and our economy. We hope you will uphold the American values that allow people to seek a better life and contribute fully to society, by reconsidering the proposed rule.

Sincerely,

Maha Freij
Director, Center for Arab American Philanthropy