



To Whom it May Concern:

I am writing on behalf of the Conrad N. Hilton Foundation, in response to the Department of Homeland Security's (the Department) Notice of Proposed Rulemaking (NPRM or proposed rule) to express our strong opposition to the changes regarding "public charge".

The Conrad N. Hilton Foundation is a family foundation established in 1944 by the man who started Hilton Hotels. We provide funds to nonprofit organizations working to improve the lives of disadvantaged and vulnerable people throughout the world. Since our inception, we have awarded more than \$1.6 billion in grants, distributing \$114.9 million in the U.S. and around the world in 2017. Our work and expertise in areas such as ending chronic homelessness, ensuring that youth who are aging out of the child welfare system become self-sufficient and thriving adults, and building career pathways for opportunity youth inform our opposition to the proposed changes to the public charge.

Under the proposed rule, any person whose family seeks or uses a wide range of health and human services programs – including affordable housing, health coverage, and food security benefits – could face barriers to maintaining or improving their immigration status. The proposed rule would notably change the definition of "public charge", abandoning the enduring meaning as a person who depends on the government for subsistence, and would even scrutinize services used by an applicant's dependents or family members—including U.S. citizen children who are entitled to such benefits. As a grantmaker focused on vulnerable persons, we oppose measures that will negatively impact the health and well-being of children and youth in our communities.

The proposed rule would significantly undermine our efforts to improve the lives of vulnerable families. Our grantmaking and partnerships support direct services and also reducing the systemic barriers that create the need for such programs, strengthening and aligning the systems that can create pathways of opportunity, and sharing knowledge about the best ways to achieve lasting change. We know that undermining access to critical health, housing, and nutrition programs for eligible immigrants and their family members will threaten the health and well-being of many of the youth and children with whom we work. The proposed changes would make child poverty worse by discouraging enrollment in programs that address health, hunger and economic security, with profound consequences on families' well-being and long-term success. The fear created by these rules would extend far beyond any individual who may be subject to the "public charge" test, harming entire communities as well as the infrastructure that serves all of us. For these reasons, we urge the Department to withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen the ability of immigrants to support themselves and their families in the future. If we want our communities to thrive, everyone in those communities must be able to stay together and get the care, services and support they need to remain healthy and productive.

Thank you for the opportunity to submit comments on the NPRM.

PETER LAUGHARN
President and CEO