



*The Annie E. Casey Foundation
Bainum Family Foundation
The Ballmer Group
Bill and Melinda Gates Foundation
Buffett Early Childhood Fund
The Burke Foundation
The David and Lucile Packard Foundation
Einhorn Family Charitable Trust
The Ford Family Foundation
Foundation for Child Development
GAR Foundation
The George Gund Foundation
The Grable Foundation
The Grossman Family Foundation
The Heinz Endowments
Heising-Simons Foundation
Irving Harris Foundation
J.B. & M.K. Pritzker Family Foundation
The Kresge Foundation
Maher Charitable Foundation
Mimi and Peter Haas Fund
The Nicholson Foundation
Omidyar Network
The Oregon Community Foundation
Perigee Fund
The Permanent Fund for Vermont's Children
Rauch Foundation
Robert R. McCormick Foundation
Robert Wood Johnson Foundation
Rose Community Foundation
Samuel N. and Mary Castle Foundation
Sisters of Charity Foundation of Canton
Stranahan Foundation
Vanguard Charitable
W. Clement & Jessie V. Stone Foundation
W.K. Kellogg Foundation
William Caspar Graustein Memorial Fund
William Penn Foundation*

December 6, 2018

Samantha Deshommes, Chief
Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2010-0012, RIN 1615-AA22, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds

Dear Madam:

I am writing on behalf of the Early Childhood Funders Collaborative (ECFC) to express our strong opposition to the Department of Homeland Security's Notice of Proposed Rulemaking (NPRM) on inadmissibility on public charge grounds. The proposed rule would cause major harm to the health and well-being of young children in immigrant families—a significant share of the young child population in the US—with justification.

ECFC is comprised of 38 foundations that invest in the health and well-being of America's young children at the national, state, and community levels. Together, we invest millions of dollars each year in early learning, home visiting, early childhood health and mental health programs, and family support programs. But philanthropy's capacity is limited. To achieve our vision--that all children have an equitable opportunity for healthy development and learning --philanthropic investment builds on a strong public safety net for families that creates a ladder of opportunity for our next generation. The proposed public charge rule directly threatens the realization of our mission by limiting access to nutrition, health, and family income necessary to meet the basic needs of children.

The stakes are high—over 25% of all the young children in the United States, or 19 million --are living in immigrant families. Well over 90% of these children are American citizens who are a critical part of our next generation of American leaders. **Families will be forced to choose between using benefits programs that provide vital services or maintaining their eligibility to remain legally in the country. This leaves children very vulnerable.**



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For example, the Kaiser Family Foundation estimates that about two million citizen children with a non-citizen parent could drop Medicaid/CHIP despite their eligibility. These losses would increase the uninsured rate for citizen children with a noncitizen parent from 8% up to 22%. Even if children continue to receive nutrition assistance and health coverage, children’s well-being cannot be separated from their parents’ well-being. Loss of benefits for parents will have a detrimental impact on multiple generations.

Children of immigrants already experience food insecurity at higher rates than other American children. The Supplemental Nutrition Assistance Program (SNAP) is the key support for low-income families to ensure that children have healthy development during the most critical growth period of their lives – the first five years. The proposed rule will make it harder for parents to put food on the table- even though good nutrition in childhood is vital and has lifelong benefits. DHS’s own analysis predicts possible “worse health outcomes, including increased prevalence of obesity and malnutrition, especially for pregnant or breastfeeding women, infants, or children...” (proposed rule; page 370). This is an unacceptable and short-sighted policy that will undermine the next generation of America’s workers and leaders.

The proposed regulations are already causing a devastating “chilling effect” in which families are declining to enroll children in services for which they are eligible – in many cases, services that are not covered in the proposed public charge rule. As funders, we work with non-profit grantees and community leaders. We have already heard from our partners across the country – including California, Nebraska, Illinois, and Virginia - that parents have declined to enroll their children in early intervention services or child care or Head Start because they fear it will hurt their long-term success in the US, even though these very services are critical to their children’s future. Children who are hungry and not healthy cannot learn. Parents who are hungry and ill cannot work to support their families and take good care of their children. If DHS moves forward with this regulation, countless more children and families will lose support.

ECFC funders join together because of our shared values <https://www.ecfunders.org/about-us/values/>. We work so that children reach their full potential, live the healthiest lives possible, and are nurtured in strong relationships with their parents, other adults, and safe and supportive communities.



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In addition to our values related to the health and well-being of children and families, ECFC members share core values expressing our vision for the country. We envision a country that:

- recognizes that US society has a stake in developmental outcomes for ALL children.
- recognizes our racial, cultural, and linguistic diversity as an asset.
- adopts budgets that reflect our values with investments in adequate health and mental health care, education (including early care and education), and economic policies that support children and families to thrive.

We believe in and invest in America, a land of opportunity. Our philanthropic support for children and families is designed to advance an equitable America with a thriving future based on children who grow up to be successful in school, on the job, and as contributing members of their communities. Achieving this vision requires both public and private action and public/private partnerships. The proposed rule conflicts with all these values.

For all of these reasons, the Early Childhood Funders Collaborative urges you to withdraw this harmful rule in its entirety. Thank you for your consideration of these comments.

Sincerely,

Shannon L. Rudisill
Executive Director
Early Childhood Funders Collaborative
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