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## Comment Submitted by Jennie Watson

This is a Comment on the **U.S. Citizenship and Immigration Services (USCIS) Proposed Rule: Inadmissibility on Public Charge Grounds**

For related information, [Open Docket Folder](#)

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### Comment

Submitted via [www.regulations.gov](http://www.regulations.gov)

U. S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Ave., 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:

I am writing on behalf of the Evelyn and Walter Haas, Jr. Fund to express our strong opposition to the proposed rule on public charge published in the Federal Register on October 10, 2018.

Based in San Francisco, the Haas, Jr. Fund seeks to fulfill its founders vision of a just and compassionate society where all people have the opportunity to live, work, and raise their families with dignity. Throughout the Funds history, its work has reflected a special concern for immigrant communities. This is in part because the Funds founder, Walter Haas, Jr., was CEO of Levi Strauss & Co. for many years and always had great respect for the immigrant workers in the companys sewing factories in San Franciscos Mission District and around the country.

The Haas, Jr. Funds focus on the issues of immigrant rights and integration crystallized in the early 2000s as we began to support the drive for comprehensive immigration reform, both nationally and in California. Despite the lack of progress on this issue in Washington, DC, we have been pleased to join with many great partners in our home state to expand rights and opportunities for immigrants. California is showing the country that everyone benefits when immigrants are allowed to play a vital role in our communities, our culture, and our economy.

But whether in California or in the other 49 states, immigrants and their families still face considerable barriers to realizing the American dream. One such barrier is anti-immigrant bias. Despite statistics showing that immigrants start businesses at a rate more than double that of the U.S.-born population, immigrants are too often portrayed as a drain on public resources. The fact is, immigrants are less reliant on public benefits and services than other populations. One million Latino children, 95 percent of whom are U.S. citizens and a significant portion of whom are children of immigrants, are eligible for Medicaid or the Childrens Health Insurance Program but are not enrolled.

The announcement of the new public charge rule reinforces anti-immigrant bias by incorrectly suggesting that immigrants are somehow less self-sufficient than other populations. Meanwhile, the effect will be to punish those low-income immigrants and their U.S. citizen children who receive critical services and support to keep themselves and their families healthy and employed, including low-cost prescription medication and food assistance. If the rule goes forward, these families will have to make an impossible choice: continue to avail themselves of vital programs that allow them to work and support their families, or move one step closer to deeper poverty and homelessness just so they do not jeopardize their legal status and risk separation from their U.S. citizen children.

For immigrant families in the San Francisco Bay Area and other expensive real estate markets, federal housing benefits such as Section 8 housing vouchers are a key lifeline enabling them to stay in their homes. A recent survey found that nearly half the renters in this region are spending more than 30 percent of their income on housing, a key benchmark for housing affordability. To penalize immigrant families, effectively including their U.S. citizen children, for using an eligible benefit that is keeping them from living on the streets is inhumane and contrary to core American values.

The Evelyn and Walter Haas, Jr. Fund has long expressed our belief in the need for real and lasting reforms to the nations immigration system. But the proposed rule on public charge is not reform. Rather, the proposed rule would increase poverty while exacerbating the fear and distrust that are already all too prominent in immigrant communities across the nation.

At the Haas, Jr. Fund, many of our nonprofit partners are working closely with immigrant communities to help them unleash their potential and participate fully in American society. We believe in the importance of treating immigrants as our neighbors. We respect and admire the contributions of immigrants to the American economy and to our communities and our culture.

This proposed rule ignores those contributions and puts children and families across this country at risk.

We hope you decide against adopting this proposal, and we look forward to joining with you in the pursuit of real reforms that bring the U.S. immigration system more in line with the ideals of fairness, equality and opportunity on which our great nation was founded.

Thank you very much for your consideration.

Sincerely,  
Jennie Lehua Watson

President  
Evelyn and Walter Haas, Jr. Fund