



December 7, 2018

Submitted via www.regulations.gov

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)*

Dear Sir or Madam:

I am writing on behalf of the General Service Foundation to express our strong opposition to the Department of Homeland Security’s Notice of Proposed Rulemaking (“proposed rule”) on “public charge,” published in the Federal Register on October 10, 2018.

The General Service Foundation (GSF) is a private family foundation that was founded 73 years ago. With offices in Berkeley, CA and Aspen, CO, GSF amplifies the visions and voices of leaders who are advancing a bold vision for a just world. Our grantmaking is a reflection of our deeply held beliefs everyone has a right to thrive, and that everyone belongs. These proposed rule changes on public charge are counter to our foundation’s core values, and will only deepen existing inequities.

The Proposed Public Charge Rules Will Perpetuate Harmful and Inaccurate Myths about Immigrants and Benefits, Undermine Public Health and Safety and Create Long Term Harm and Trauma in Immigrant Communities.

The proposed rule puts low wage immigrants in the cross hairs, creating a narrative that they are not welcome in this country, and that they take resources from U.S. citizens. The proposed rule perpetuates the false stereotype that immigrants are overly dependent on public benefits. In actuality, immigrants underutilize benefits and services. 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 CHIP but are not enrolled.^[1] If there is a “problem” regarding immigrant families’ utilization of public benefits, it is underuse relative to need, with immigrants excluded from many public benefits supported by their tax payments, and far too many immigrants going without benefits for which they are eligible, due to misinformation and fear. The proposed regulation will make these problems worse.

It is the role of government to provide services for the people living within a country’s borders. Our role as a foundation is to complement government supports. We provide funding to create the conditions for a more just world. This proposed policy will divert crucial philanthropic resources to respond to both a policy and a narrative that will threaten basic human dignity and perpetuate negative messages about immigrants.

This ill-advised policy will create trauma within families that will takes years, if not generations, to erase due to the stress of forgoing basic needs in order to be considered for legal status. It will have a lasting

effect on the physical and mental health of immigrants due to a lack of health care, nutrition and housing. This proposed policy is designed to ensure that immigrants stay poor, disenfranchised and hidden, which can impact the economic and educational attainment of children and their families for generations. The policy seeks to dissuade immigrants from accessing legally available benefits by creating a climate of fear of discrimination. This proposed policy reinforces a racial caste system between those who "worthy" of having their basic needs met and those who are not.

At GSF, we believe that it is important to invest in all members of society. Health, housing and nutrition programs should support the most vulnerable, and ensure that all families thrive. It is not possible to separate out members of our community and cut off services without impacting all communities. This policy will have a negative impact not only on immigrants and their families, but on all communities.

The introduction of this proposal has already had a chilling effect resulting in fewer immigrants seeking public benefits, and others un-enrolling from necessary public benefits out of concern for the consequences of this rule change. Already, fewer children have health insurance and access to food and housing as a result of this process, even before this regulation is a law. This proposed rule will only make life more precarious for our country's most vulnerable, and will make the United States a poorer, sicker, and hungrier nation. We believe in a country that invests in all of its people, and that ensures that everyone thrives and for that reason we strongly oppose the proposed public charge rule.

Sincerely,

Robin Snidow
Board Chair, General Service Foundation

Dimple Abichandani
Executive Director, General Service Foundation

^[1] See Georgetown University Health Policy Institute Center for Children and Families and National Council of La Raza, "[Latino Children's Coverage Reaches Historic High, But Too Many Remain Uninsured](#)."