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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:

As President of the Healthy Communities Foundation and as an immigrant myself, I am writing on behalf of the Foundation to express our strong opposition to the expansion of the public charge rule definition published in the Federal Register on October 10th, 2018.

HCF is a private independent foundation that aims to improve the health and well-being of individuals, families and communities in its 27-zip code service area, located in Chicago and the suburban municipalities of western Cook County, Illinois. HCF promotes health equity, quality and access for these communities and believes all residents, especially those who live with the greatest disparities, should have access to the resources and opportunities that create a sustainable quality of life. Our grantmaking principles center on racial, ethnic and socioeconomic equity and we award grants to organizations that address individual health needs as well as systemic barriers to health.

We denounce the recent change in the public charge rule as it deliberately hurts those that already face significant challenges in our communities and threatens the health of families, people of color and particularly young children. About 25% of the 900,000 residents that reside within our service area are immigrants (1). Therefore, through commissioned research of our service area and of our own personal experiences living and working in our region, we understand the hardships that these communities face every day and we work towards addressing those needs.

With this rule, immigrant families are put in an inconceivable position to choose between accessing necessary public health benefits and preserving their immigration status. The fear of being deemed a public charge is enough for them to withdraw from public benefits that they and their families are rightfully eligible to receive, such as Medicaid and SNAP (formerly known as food stamps). Mixed-status families are particularly vulnerable to this rule change as citizen children are not receiving the care they are fully eligible for. The health implications brought on by the public charge rule reverberate into several aspects of an individual's life and only deepens the susceptibility towards issues of poverty, food insecurity and housing instability.

Within our service area, 32% of residents have incomes below 150% of the federal poverty level (FDL) which, based on the new income threshold of 125% FPL described in the rule, impacts more than a quarter of our population (2). Furthermore, 25% of our population receives Medicaid and covers more than 50% of children under 17 (3). Citizen children are at risk of not having health insurance and this should be a concern for all of us.

The effects of this rule change are not short-lived nor isolated to the immigrant community. The toxic stress and trauma that young children experience can have a compound effect leading to long-term mental and physical health outcomes. According to a report from the American Academy of Pediatrics, "...toxic stress in young children can lead to less outwardly visible yet permanent changes in brain structure and function." (4) The future

of our children and the rest of our society is at risk. In fact, the rule change's impact will touch all of us, our local/national economies, our education system, our healthcare system, among other aspects in our society.

Philanthropy builds upon what a functioning government system should provide individuals in this country, which are basic, fundamental needs. However, the public charge rule erodes the provision of those needs and places a burdensome stressor on social services and philanthropy to fill the gaps. Our grantee partner organizations are witnessing the chilling effect of this rule and are working tirelessly to address it by redirecting resources to this issue. Our philanthropic goals are also interrupted as our resources are diverted to address rapid action against unnecessary and ineffective rules such as this one.

Living one's best life in this country should not be contingent on whether you were born in the United States. It should not be based on your income level, the color of your skin or the language you speak. Living a healthy and full life is a right – a human right.

We will strengthen our efforts and collaborations with our local and national partner organizations to continue working towards the common vision of healthy and vibrant communities for all. There is no room in society for hateful and discriminatory policies like this one. The Administration should immediately dismiss this proposed rule.

Maria S. Pesqueira

President, Healthy Communities Foundation