

November 19, 2018

Dear Sir or Madam:

I am writing on behalf of The Heising-Simons 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 Heising-Simons Foundation is a family foundation based in Los Altos, California. We work with our many partners to advance sustainable solutions in climate and clean energy, enable groundbreaking research in science, enhance the education of the nation's youngest learners, and support human rights for all people.

As a Foundation that has long invested in young children and their families and that seeks to support the well-being of immigrant communities, we strongly oppose the proposed rule. The proposed rule will exacerbate hunger and educational issues for our nation's children, and will in turn destabilize communities across the country,¹ including those here in Silicon Valley.

Several years ago, we funded research by the Urban Institute that showed that nearly three quarters of all low-income preschool-age children in Silicon Valley are the children of immigrants.² By law, these children will be part of our schools. When they are not given the chance to flourish, we will not be able to reach our goals in education.

We have already begun to see concerning symptoms. As word leaked of proposed changes to public charge determinations, local immigrants and their families began to withdraw from benefits, even in cases when the benefits were not listed in the proposed rule changes. Data from the San Mateo County Human Services Agency, reported to our grantee The Legal Aid Society of San Mateo County, shows that the county saw a 15% drop in CalFresh use among non-citizens from January 2017 to January 2018, as opposed to a 9% drop from citizens.

As a Foundation, we seek to improve lives not only by directly supporting organizations working with families and in communities, but also by improving the public systems that provide for the basic needs of our community members.

We foresee this proposed rule as having serious ripple effects in the early education and K-12 systems, both of which we have long supported. Earlier this year, Education Week noted that "[n]early 80 percent of educators report having students who have experienced emotional or behavioral problems because they are concerned about immigration enforcement, according to a new national survey from the Civil Rights Project at the University of California, Los Angeles."³

¹ See Migration Policy Institute, [Chilling Effects: The Expected Public Charge Rule and Its Impact on Legal Immigrant Families' Public Benefit Use](#)

² See Urban Institute, [Preschool Participation for Low-Income Children and Low-Income Children of Immigrants in Silicon Valley](#)

³ See Education Week, [Trump's Immigration Policies Hurting Academics and School Attendance, Survey Finds](#)

Educators have told us how children of immigrants, both U.S. citizens and not, are coming to school less ready to learn as a result of the culture of fear perpetuated by this proposed rule and other administration efforts targeting immigrant families. Educators and school administrators have also told us of their own confusion about what information to give families. They feel at a loss for how they can support families in crisis as a result of this proposed rule and other administration efforts. This distracts their attention from their job to educate and nurture the next generation. And it makes it harder for philanthropy to meet its own mission of being generative and catalytic and building on the foundation of the public system.

We urge you to reconsider this rule. It will unnecessarily destabilize working families and communities and will, over time, discourage families from engaging with public institutions. This affects us all.

Sincerely,

Deanna Gomby
President and CEO
Heising-Simons Foundation