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U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue
Washington, D.C. 20529-2140

Re: DHS Docket No. USCIS-2010-0012-0001, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds

Dear Sir/Madam,

As Director of the James and Gretchen Sandler Philanthropic Fund, I am writing to express our strong opposition to the Department of Homeland Security's Notice of Proposed Rulemaking on Public Charge, published in the Federal Register on October 10, 2018.

The James and Gretchen Sandler Philanthropic Fund is a private grantmaking fund that awards community organizing and public policy advocacy efforts across the Bay Area, California, and nationally to support Domestic Workers and Immigrants' rights. Our commitment is to individuals, families and the immigrant community most impacted by

economic, social, and racial injustice. We believe this rule change is racist and will largely impact poor immigrants of color.

The proposed change to the Public Charge rule would limit access to critical programs that help tax-paying immigrants, many of whom are U.S. citizens, and their families access health care, food, and other essential needs. These supports include SNAP, Medicaid, Medicare Part D subsidies, and public housing subsidies. These programs have helped to improve participants' health, well-being, school success, and economic security. By systemically denying and discouraging families access to basic supports, this rule change would create financial and emotional burdens, exacerbating racial disparities and income inequality. Targeting low-income, middle-income and underemployed immigrants covertly perpetuates negative stereotypes about immigrants and their families.

The proposed change has already made many immigrant families afraid to seek programs that support basic needs. With about one in four children having at least one immigrant parent, this issue touches millions and is critical now and for our nation's future. It would penalize those who use benefits for which they are eligible by taking away their chance at green cards or visas for family members. Experts estimate that there could be a decline of between 20% to 60% of people accessing care, which will have reverberations in their families and communities. This goes against this Country's values. Societies should strive to assist those who are experiencing extreme hardships and provide the basic human right of a living a healthy and full life.

The proposed change in this rule could hurt the many industries that employ lesser-skilled, but essential, workers. Industries like agriculture and domestic work need more workers and are trying to hire them legally under temporary worker visas but may not be able to do so if those workers cannot meet new and arbitrary standards of self-sufficiency.

Most Americans agree that immigrants are an essential part of our economy and society. We need a system that recognizes this and supports migrants, not penalizes them. Philanthropy is often called upon to fill the social service gaps that government doesn't provide. Forcing grantmakers to shift these resources requires a shifting away from already needed services. With almost two decades of grantmaking centered

around helping those newly-arrived immigrants with little understanding of the language, culture, and laws, we have been witnesses to success stories and living examples of the American dream. The proposed rule would have a dramatic impact and affect the long-term positive economic contributions of immigrants to the U.S. economy. The Sandler Fund will continue to work in collaboration with trusted partners and community organizations to strengthen the network that is essential to newly-arrived immigrants. We stand firmly against the intent and the effects of these proposed changes.

The safety and humanity of individuals should be among the defining characteristics for welcoming immigrants to our communities. The Administration should immediately withdraw its proposal.

Sincerely,

Somma LeBron-Cooke, Director of Philanthropy
James and Gretchen Sandler Philanthropic Fund
San Francisco, CA 94117