



December 7, 2018

Samantha Deshommes  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue, NW  
Washington, DC 20529-2140

RE: Request for Public Comment on Proposed Regulation: “Inadmissibility on Public Charge Grounds” – DHS Docket No. USCIS-2010-0012

Submitted via regulations.gov

Dear Ms. Deshommes:

On behalf of the Latino Community Foundation (LCF), I am writing to express our strongest opposition to the Department of Homeland Security’s proposed regulation on “public charge,” published in the Federal Register on October 10, 2018.

LCF is the premier statewide foundation investing in Latino leadership. We fulfill our mission by building a movement of civically engaged philanthropic leaders, investing in Latino-led organizations, and increasing the civic and political participation of Latinos. We are committed to this work because Latinos have been the backbone of the economic growth and wellbeing of our state and they represent the future of our country.

We know that the success of our state and our nation is intrinsically tied to the success of hard-working Latinos and immigrant families. The numbers are significant. With over 15 million Latinos in California, the state has grown to become the fifth largest economy in the world. With hope-filled dreams of a better life for their children, our families sacrifice everything to work as farmworkers, service providers in restaurants, hotels, private homes, construction workers, and the list goes on. So many of these job opportunities barely offer them the wages to live and put food on their table. And now, this proposed regulation will cause immeasurable harm to their lives and the lives of their children. They are our coworkers, our classmates, and our neighbors.

That is why the proposed regulation on “public charge” deeply concerns us. To ask immigrants to choose a path between providing for their families or securing legal status is morally reprehensible and economically unsound. Through their collective strength, undocumented immigrants contribute [\\$181 billion](#) to California’s overall GDP.

As it stands, [61%](#) of Children’s Health Insurance Program (CHIP) recipients are Latino and nearly [half](#) of all households in California who use CalFresh are Latino. Under the proposed changes to “public charge,” immigrants will become fearful of participating in these programs.

This will greatly increase suffering—caused by poverty, hunger, access to healthcare, and mental stress. Because of the inhumane choices immigrants will be forced to make under this proposed regulation, our economy will also suffer. According to the Fiscal Policy Institute, if 35% of California’s immigrants disenroll from programs such as CHIP and CalFresh, the state could lose over [66,000 jobs](#) and could lead to over [\\$9 billion](#) in lost economic output.

Yet the most important reason the proposed changes to “public charge” must be stopped is because it stands contrary to who we are as a nation. It undermines the values this nation was founded on: shared sense of humanity, opportunity, hope, and the pursuit of happiness. At its worse, the administration’s rule change is a matter of life and death— threatening the health of millions who receive critical care through programs like Medicaid.

**When our immigrant population is forced deeper into the shadows because of proposed regulations like these, nobody stands to gain anything. Instead, we stand to lose our soul as a nation.**

For these reasons, we strongly oppose the proposed changes to “public charge.” Thank you for your attention to my comments. If you have any questions or need any further information, please contact me at [carana@latinocf.org](mailto:carana@latinocf.org).

Sincerely,



Christian Arana  
Policy Director  
Latino Community Foundation