



SIERRA HEALTH
FOUNDATION

December 10, 2018

Samantha Deshombres
Chief, Regulatory Coordination Division
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

Dear Ms. Deshombres:

I am writing on behalf of Sierra Health Foundation to express our unwavering support for immigrant communities. As a foundation committed to improving the well-being of our communities, we stand with immigrants and refugees in protecting their rights as Americans to live a healthy and happy life with dignity. In response to the recent and proposed policies that threaten the safety, health and well-being of immigrants and their families, we call an end to the dangerous and inhumane policies that unfairly target immigrants rather than recognizing their essential contributions to this nation. To that end, Sierra Health Foundation strongly opposes the proposed regulation expanding the assessment of what constitutes a “public charge.”

Sierra Health Foundation is a private philanthropy that forges new paths to promote health and racial equity in partnership with communities, organizations and leaders in Northern California, including the San Joaquin Valley. As such, we are committed to serving impacted communities, including immigrants and refugees. We recognize the countless contributions that immigrants and refugees make to our society, both economically and socially. Immigrants are our employees, co-workers, neighbors, teachers, students, doctors, nurses and key community members. They are our family members. They are our future. They are us.

In the state that has the most immigrants in our nation, California is most at-risk of bearing the brunt of the proposed regulation to expand the assessment of how a “public charge” is determined. Given the current policy environment, immigrant families are already afraid to participate in programs that support their basic needs and health. The proposal could further dissuade immigrants from using the programs their tax dollars help support, preventing access to health-supportive needs like nutritious food and secure housing. The proposed change would make poverty worse by discouraging enrollment in programs that address health, hunger and economic security, with profound consequences on families’ health, well-being and long-term success. The fear created by these rules would extend far beyond any individual who may be subject to the “public charge” test, harming entire families and communities as well as the infrastructure that serves all of us. Community providers have already reported changes in health care use, including decreased participation in Medicaid, SNAP and other programs due to community fears stemming from the draft regulations.

Most notably, since one in four children comes from immigrant families, and most of these children are citizens, the detrimental impact of the proposed expansion to public charge will affect millions of citizen children. As research has shown, the far larger “chilling effect” will dissuade many families from enrolling or keeping their coverage and services for their children, limiting access to critical health and social services, and disrupting healthy development for, potentially, millions of children. The proposed regulation would negatively impact the lives of countless families across California and the United States. Children in immigrant families do not live in isolation. They live and grow up in communities where their individual success, and their families’ success, is critical to the strength of the country’s future workforce and collective economic security. Our lives are profoundly interconnected. Children who are hungry will be unable to focus in class, and the entire class will make less educational progress. Children who are sick but can’t get antibiotics will make their classmates sick. Children who can’t see a regular doctor for lack of insurance will end up in emergency rooms more often, making it harder for everyone who really needs emergency health care to be seen and draining our hospitals.

Investing in nutrition, health care and other essential needs helps keep children learning, parents working, families strong, communities thriving and allows all of us to contribute fully to our communities. The policies articulated in the proposed rule would terrify immigrant families, discourage or prevent hard-working people from immigrating, and deter immigrant families, most of which include U.S. citizen children, from seeking the help they qualify for and need to lead a healthy and productive life.

In conclusion, Sierra Health Foundation strongly opposes the proposed rule on public charge. The proposed rule is inconsistent with the history of how public charge has been understood and applied, and would make arbitrary and capricious changes. Our country must continue to value the contributions of immigrants to this country and recognize that value in the context of our immigration system. It is therefore vital that this rule is not finalized.

In particular, we urge policies that support and expand on immigrants’ access to public benefits and other essential services, as we recognize that the most vulnerable among us can and will one day be the most vital, caring and productive citizens and leaders.

We appreciate this opportunity to comment on this proposed regulation.

Sincerely,



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