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Comment Submitted by Gina Dalma, Vice President of Government Relations & Special Advisor to the CEO, Silicon Valley Community Foundation

This is a Comment on the **U.S. Citizenship and Immigration Services (USCIS) Proposed Rule: Inadmissibility on Public Charge Grounds**

For related information, [Open Docket Folder](#)

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Comment

Samantha Deshommes, 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: Comments on Proposed Regulation Inadmissibility on Public Charge Grounds (DHS Docket No. USCIS-2010-0012)

Ms. Deshommes,

I am writing on behalf of Silicon Valley Community 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.

Silicon Valley Community Foundation (SVCF), headquartered in Mountain View, California, advances innovative philanthropic solutions to challenging problems. We play an important role in addressing the social, economic, and environmental challenges of our communities.

As an organization concerned with equitable representation of underserved and immigrant communities, SVCF strongly opposes the Administration's public charge proposal. The harms resulting from the proposed rule will wreak devastation across the country and the economy. It will undercut the health and well-being of millions of immigrant families and exacerbate hunger, child poverty, and homelessness among immigrants and U.S. citizen children living in mixed-status families. And because immigrant families are interwoven into our social and economic fabric, these negative consequences will reverberate across the communities where we all live and work.

Silicon Valley would be especially impacted; more than one third of the 2.5 million residents of San Mateo and Santa Clara counties are immigrants, and more than two thirds of those younger than 18 are children of immigrants. More than twice as many immigrant and refugee families in Silicon Valley are living in poverty (7.8 percent) as compared to the general population (3.8 percent). These immigrants are not only challenged by the high cost of living in Silicon Valley but also by language as well as educational and legal barriers that make it difficult for them to access economic opportunities. The proposed rule imposes burdensome penalties and hardships on our hard-working, tax-paying immigrants. In general, immigrants have high rates of employment but in our area immigrants frequently work in jobs that pay them less than their U.S.-born counterparts and do not provide them with employer sponsored health insurance . Billions in taxes paid by immigrant families help support all government programs. Yet low-income children with foreign-born parents are less likely to receive SNAP or Medicaid than are children with U.S.-born parents.

The proposed rule will also roll back decades of investment by public agencies and philanthropy to increase immigrant families access to health and social services, reduce racial and ethnic disparities, improve community health and well-being, and facilitate long-term self-sufficiency and upward mobility. These deleterious effects will be felt by foundations (like ours) that seek to promote family economic security, businesses that employ immigrants, and communities where these families live and contribute.

Since 2008, SVCF has invested more close to \$10 million in programs that strengthen the legal services infrastructure in our region to ensure the provision of affordable and reliable legal services for immigrants. For example, we made investments in programs that provided Vocational English and English as a Second Language courses to ensure greater economic advancement by immigrants. We also funded the use of art and media, coupled with a social-change agenda, to bridge the cultural gap and create better understanding of both the receiving and immigrant communities in our region. We created and facilitated these programs because of our tireless dedication to improving the lives of immigrants. And we make these investments because we are a state of immigrants California leads the nation in DACA-eligible residents with approximately 539,000, or 28.4 percent.

However, philanthropy relies on a functioning government system to provide for basic needs onto which philanthropy may build. This rule fundamentally and adversely impacts the trajectory of our long-term commitments to community, while being unnecessary and ineffective in its purported goal.

Sincerely,

Gina Dalma
Vice President of Government Relations &
Special Advisor to the CEO