



12/10/18

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)

Dear Sir or Madam:

I am writing on behalf of Solidarity Giving to express our strong opposition to the changes proposed by the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking ("proposed rule") on "public charge," published in the federal register on October 10th, 2018.

Solidarity Giving is a donor advised fund launched by Brian and Tegan Acton in 2017 to support and defend America's civic values. The fund supports organizations that advance civil rights, promote civic engagement, and advocate for equity and systems reform. At Solidarity Giving, we believe that immigrants are an important part of the fabric of America—hard-working immigrants have been a critical part of our country's history since its inception and continue to make important contributions to American society.

We are concerned about the new public charge rule for the following reasons:

- **The proposed rule would create a chilling effect, deterring people from benefits for which they are eligible:** If the new public charge rule goes into effect, it would put millions of hard working immigrant families at greater risk of poverty, hunger, poor health, and homelessness. Even though the rule changes would affect a relatively small group of people, experts predict that as many as 26 million Americans could be deterred from participating in government programs¹ that not only keep their families healthy and strong, but also help to ensure a healthy and strong economy.
- **The proposed rule will negatively impact children and their families.** The rule will not only affect immigrant children but also the 1 in 4 American children in this country—18 million kids—

¹ Center for Law and Social Policy (October 2018). *Who would be harmed by Trump's "public charge" proposal?* Retrieved from: <https://www.clasp.org/publications/fact-sheet/who-would-be-harmed-trump-s-public-charge-proposal>

with at least one immigrant parent. The proposed changes to the rule would make it even more challenging for low-income, immigrant parents to ensure that their children's basic needs are met. SNAP, Medicaid, and federal housing assistance are crucial for children, protecting them from poverty, poor health, food insecurity, and homelessness.² The benefits of these government assistance programs are long-lasting, according to the Center on Budget and Policy Priorities. "Government economic security programs— which bolster income, help families afford basic needs, and keep millions of children above the poverty line — also have longer-term benefits, studies find: they help children to do better in school and increase their earning power in their adult years."³

- **The proposed rule will unfairly punish hardworking low-income immigrants:** In the United States, immigrants have high rates of employment yet they often work in low-paying industries and in jobs that do not provide employer-based health coverage. According to the Bureau of Labor Statistics, the unemployment rate for foreign-born persons in 2017 was 4.1%, lower than the rate of native-born persons at 4.4%.⁴ However, without a living wage and employee-based health coverage, immigrants often supplement their income by participating in a health, nutrition, or housing benefit, particularly when they are first entering the workforce here in the United States. This does not mean they are "likely to become primarily dependent on the government for subsistence," as public charge is currently defined. The new definition of public charge, including additional government assistance programs, will unfairly punish those who have come to this country to contribute and work hard.

How we treat immigrants and people who come to this country to seek a better life reflects who we are as a country. The public charge rule is an affront to our United States values, punishing people who have come to this country to work hard and achieve the American Dream. We urge the Department of Homeland Security to rethink this harmful and unfair rule.

Sincerely,



Emma Pompetti
Managing Director

² Hoynes, H.W., & Schanzenbach, D.W. (2018). *Safety net investments in children*. Retrieved from: <https://www.brookings.edu/bpea-articles/safety-net-investments-in-children/>.

³ Center on Budget and Policy Priorities (July 2017). *Economic security programs help low-income children succeed over long term, many studies find*. Retrieved from: <https://www.cbpp.org/sites/default/files/atoms/files/7-17-17pov.pdf>.

⁴ Bureau of Labor Statistics (May 2018). *Labor force characteristics of foreign-born workers summary*. Retrieved from: <https://www.bls.gov/news.release/forbrn.nr0.htm/Labor-Force-Characteristics-of-Foreign-Born-Workers-Summary>