



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 Sunlight 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 10, 2018.

Sunlight Giving, a family foundation in the San Francisco Bay Area, works to sustain healthy families and strong communities by supporting organizations that provide basic services to low income families with children ages 0-5 in ten counties across our region. Of utmost importance to our foundation is that young children have enough food to eat, are able to access the health care they need, and have a stable place to live. The proposed policy will make immigrant families afraid to access essential health, nutrition, and shelter programs.

We are gravely concerned that the new public charge rule will have a detrimental impact on California’s children, a state where nearly one in two children are part of an immigrant family<sup>1</sup>. Even though the rule changes would affect a relatively narrow group of people, experts predict hundreds of thousands more Californians could drop out of government programs because of confusion and fear. This chilling effect would negatively impact California’s children—many of whom are eligible for public benefits—increasing poverty, hunger, and poor health in vulnerable communities across the state.

We urge you to take the following information under account as you consider changing the rule around public charge:

***Children need access to nutritious foods:*** One in 10 Californians participate in CalFresh, California’s Supplemental Nutrition Assistance Program (SNAP), and more than 73% of participants are in families with children.<sup>2</sup> The UCLA Center for Health Policy Research estimates that between 129,000 and

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<sup>1</sup> Lucile Packard Foundation for Children’s Health (August 2018). [Bar graph]. *Children living with one or more foreign-born parent, 2016*. Retrieved from: <https://www.kidsdata.org/blog/?p=8327>.

<sup>2</sup> Center on Budget and Policy Priorities (December 2018). *Supplemental Nutrition Assistance Program fact sheet: California*. Retrieved from: [https://www.cbpp.org/sites/default/files/atoms/files/snap\\_factsheet\\_california.pdf](https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_california.pdf).

301,000 people would remove themselves from CalFresh if the new rules take effect.<sup>3</sup> The SNAP program is critical when it comes to lifting families out of poverty and reducing food security. The consequences of food insecurity are extensive, particularly when it comes to the health and development of young children. Food insecurity has been linked to lower health status, low birth weight, more frequent colds and stomachaches, asthma, mental health programs, and poor educational performance and academic outcomes.<sup>4</sup>

**Children need access to quality health care:** Medi-Cal, California’s Medicaid program, provides health insurance to a third of Californians. The UCLA Center for Health Policy research estimates that new public charge rules could result in 317,000-741,000 people un-enrolling in the program.<sup>5</sup> This would be detrimental in a state like California where more than 97% of children were insured in 2017<sup>6</sup> and the health community has worked tirelessly over many years to reduce uninsured rates among children. Children in immigrant families who have health insurance are more likely to have a primary medical provider and receive regular health care visits.<sup>7</sup>

**Children need stable housing:** In our region, affordable housing is one of the biggest barriers to financial stability for families. According to the Center for Law and Social Policy, without housing assistance, “children are more likely to live in overcrowded conditions, become homeless, and move frequently. They are also more likely to remain in high-poverty neighborhoods, which is associated with poor health and educational outcomes.”<sup>8</sup> Housing assistance helps families with the cost of rent and ensures that they have enough financial resources to spend on other basic needs, improving family financial stability and supporting the healthy development of children.

As you can see from the information above, children benefit when they—and their family members—can access programs and services that help them to meet basic needs and promote their healthy development. These public programs provide a lifeline to low-income immigrant families, but they are so much more than that. Safety net programs are the foundation of a healthy economy, improving opportunities for hard-working families and creating a society where opportunity is broadly shared.

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<sup>3</sup> The UCLA Center for Health Policy Research (November 2018). *How proposed changes to the ‘public charge’ rule will affect health, hunger and the economy in California* [PowerPoint slides]. Retrieved from: <https://healthpolicy.ucla.edu/newsroom/Documents/2018/public-charge-seminar-slides-nov2018.pdf>.

<sup>4</sup> Food Research & Action Center (December 2017). *The role of the supplemental nutrition assistance program in improving health and well-being*. Retrieved from <http://www.frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>.

<sup>5</sup> The UCLA Center for Health Policy Research (November 2018). *How proposed changes to the ‘public charge’ rule will affect health, hunger and the economy in California* [PowerPoint slides]. Retrieved from: <https://healthpolicy.ucla.edu/newsroom/Documents/2018/public-charge-seminar-slides-nov2018.pdf>.

<sup>6</sup> Georgetown University Center for Children and Families (2017). *State health care coverage facts* [website]. Retrieved from <https://ccf.georgetown.edu/state-childrens-health-facts/>.

<sup>7</sup> The Center for Law and Social Policy (CLASP) (October 2018). *Public charge: A threat to children’s health and wellbeing*. Retrieved from [https://www.clasp.org/sites/default/files/publications/2018/06/2018\\_pifchildfactsheet\\_web.pdf](https://www.clasp.org/sites/default/files/publications/2018/06/2018_pifchildfactsheet_web.pdf).

<sup>8</sup> The Center for Law and Social Policy (CLASP) (October 2018). *Public charge: A threat to children’s health and wellbeing*. Retrieved from [https://www.clasp.org/sites/default/files/publications/2018/06/2018\\_pifchildfactsheet\\_web.pdf](https://www.clasp.org/sites/default/files/publications/2018/06/2018_pifchildfactsheet_web.pdf).



Philanthropic organizations rely on a functioning government system to provide for basic needs onto which philanthropy may build. The community organizations that we support—the food banks, health care clinics, and community service agencies—are concerned about the consequences the proposed public charge rule will have on those in need in our community and the strain it will put on community organizations. These agencies do not have the capacity to fill the void that will be left when families disenroll from vital food, health, and housing government programs. This rule fundamentally and adversely impacts Sunlight Giving’s long-term commitments to community, while being unnecessary and ineffective in its purported goal.

As a foundation, we believe in dignity and respect for all people. We believe that our communities and our country should welcome immigrant families no matter where they are from or how much money they have. The proposed “Public Charge” regulation undermines our philanthropic goals, and does not represent our values as a foundation or as a country.

Sincerely,

A handwritten signature in black ink, appearing to read "Carolyn Wall Sakata".

Carolyn Wall Sakata  
Managing Director