

November 30, 2018

Samantha Deshommès, 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: DHS Docket No. USCIS-2010-0012

Dear Chief Deshommès:

Thank you for the opportunity to submit comments on the Department of Homeland Security's proposed changes to the "public charge" rule. We are very concerned about the impacts the rule changes will have on women and families in Texas and across the country, as well as on the economy.

Texas Women's Foundation is one of the largest regional women's funds in the world. Over 33 years, we have invested more than \$42 million in programs advancing economic security and leadership for women, girls and families. We are a community-supported foundation with donors from across the political spectrum who come together in our belief that strong women and families are the path for a strong Texas. Our *Economic Issues for Women in Texas* reports released in 2014 and 2017 both demonstrated the importance of family supports, including health care, housing, education and child care to allow women to fully participate in the workforce. We firmly believe that a strong safety net is imperative for community success.

On behalf of our entire Board of Directors, we are writing to urge the DHS to immediately withdraw the "public charge" proposed rule changes. The proposed regulation expands the test to consider whether a parent or, in some cases, her child has used or is likely to use government programs, including Medicaid, the Supplemental Nutrition Assistance Program (SNAP) and housing assistance. By widening the test in this way, millions of children and families are at risk of being deprived of vital nutrition, as well as health and housing services, out of fear that using such programs puts their opportunity to obtain a visa or green card in jeopardy.

Medicaid is a key source of vital prenatal care. Healthy pregnancies are less expensive for our communities, result in healthier children and better outcomes for all. Adequate housing provides an anchor for families in communities, yet costs continue to outstrip income. In Texas, 47% of Hispanic female-headed households are housing burdened spending more than 30% of their income on housing costs.

If approved, the new rule will not only inhibit workforce growth, but will have immense impacts on the health and educational success of children across the country. One in every four children in the United States lives in an immigrant family, meaning that the child or at least one parent is foreign-born. In 2017, more than 46 million children in the United States relied on Medicaid and the Children's Health Insurance Program (CHIP). Children covered by Medicaid and CHIP miss fewer school days due to illness or injury, perform better in school, are more likely to graduate and attend college, and be healthier adults that earn higher wages and pay more in taxes than their uninsured peers. Research also shows that when parents have health insurance, children are more likely to get the care they need; when parents do not have health care coverage, their children's health can suffer. Already, due to fear and confusion about the possible implications of the rule change, healthcare clinics are seeing a drop in children's health service appointments. The proposed rule changes will not only have a negative impact on the workforce and economy today, but also children's health, well-being and success in the future.

We appreciate the DHS's important work in maintaining a strong, just and prosperous nation that adheres to values held for over 240 years. In our small way, Texas Women's Foundation is also working to build communities and economies. The proposed rule changes to include key supports, such as CHIP, Medicaid, SNAP and housing assistance, target programs that have a strong return on investment for communities. They prepare immigrant families, and potential future citizens, for success in school and work. We believe, and evidence shows, the proposed rule changes would be detrimental to long-term goals; we ask that you rescind these proposed changes and continue with the historical definitions of "public charge."

Sincerely,



Caren K. Lock
Chair, Board of Directors



Roslyn Dawson Thompson
President & CEO