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December 10, 2018

Submitted via www.regulations.gov

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 the Fund for New Citizens in The New York Community Trust to oppose the Department of Homeland Security's Notice of Proposed Rulemaking ("proposed rule") on "public charge," published in the Federal Register on October 10, 2018.

The Fund for New Citizens was established in 1987 to coordinate the philanthropic response to changing laws, policies, and circumstances affecting immigrants living in New York City. The Fund makes grants to support quality, affordable immigration legal services; advocacy for policies that benefit the City's immigrants; and organizational capacity-building for immigrant-led groups that anchor this advocacy. For purposes of this comment, its members include the Altman Foundation; Morton K. and Jane Blaustein Foundation; Booth Ferris Foundation; Harman Family Foundation; SC Group; The New York Community Trust; New York Foundation; Charles H. Revson Foundation; and RCHN Community Health Foundation.

The proposed rule will put tremendous strain on the organizations and institutions that work with and provide services to immigrants and their families, including social services agencies, community health centers and hospitals, legal services providers, and others—including many of our grantees. Moreover, the proposed rule will roll back decades of philanthropic investment to increase immigrant families' access to health and social services, reduce economic and educational disparities among immigrant populations, and help immigrants integrate into the City's civic and economic life. Over the past 30 years, the Fund for New Citizens has awarded more than \$21 million in grants to strengthen the City's immigrant-serving nonprofits. The proposed public charge rule threatens that investment, and the substantial investments that our colleagues in philanthropy have made in immigrant-led organizations and immigration-focused initiatives.

Perhaps the most pernicious effect of expanding public charge as a ground for inadmissibility is the likelihood that it will create—and in fact, undoubtedly already is creating—a profound chilling effect on the use of vital services by immigrant families. In New York City, local officials estimate that more than one million residents are likely to be discouraged from seeking benefits as a result of the proposed rule; the children of immigrant parents are most vulnerable.

The diversity of New York City's residents is one of our greatest assets. By instilling fear in local immigrant communities—and thereby endangering their health and welfare—the proposed rule stands to inflict long-term damage on the social fabric of the City. As such, we urge the Department of Homeland Security to reconsider its proposal and discontinue its efforts to broaden the scope of public charge.

Sincerely,

The members of the Fund for New Citizens in The New York Community Trust