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Comment Submitted by Colleen Laing, United Way of King County

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

United Way of King County is writing in opposition to proposed changes in the public charge rule for the following reasons:

Broadening the benefits considered in determining if an individual is a public charge from cash assistance endangers the well-being of families and communities. King County residents are very diverse, and immigration makes up a significant portion of our community. Some jurisdictions within King County are comprised of 40% or more immigrant families. Forcing families to choose between the opportunity to qualify for permanent legal residency and necessary (even lifesaving) services such as housing, food, and medical care is cruel and counterproductive.

There are over 12,000 homeless individuals in King County, half of whom are unsheltered. Denying housing benefits runs counter to the federal HUD and Interagency Council on Homelessness' Continuum of Care (COC) approach and our community goals under our COC plans. Housing is a lifesaving resource, especially for families with young children. Forcing Hobbsian choices on unstably housed people harms our whole community by increasing homelessness and adding to the trauma of homelessness for families and individuals already under tremendous stress.

Food is a necessary resource for survival. Food security enables children to thrive, and adults to maintain their productive membership in society. Forcing families to choose between food assistance and permanent legal residency eligibility will result in increased hunger, which leads to more disease, poor school outcomes for children, and a lack of productivity for adults. Already we have seen among our grantee agencies a significant drop in immigrant families accessing WIC and SNAP resources. Our community is ill-served by this because the very children most likely to stay in our educational and health systems do not thrive due to lack of adequate nutrition. In this same vein, medical care is also a lifesaving resource that immigrant families should continue to be able to access, and increasing these families' barriers to health care

harms the viability of our entire community.

Beyond the unraveling of the critical support system King County philanthropies and local governments, Washington State, and the federal government have woven together, United Way of King County has significant concerns about the entire approach to widening the definition of public charge from a focus on likelihood of becoming dependent to utilization of public benefits. This is a fundamental shift in the US immigration philosophy that has made our nation what it is today. America is a nation of immigrants, and financial security is what people who come here seek, not necessarily what they bring. We can't know the nature of the change in our national character if we begin to exclude people striving to improve their and their children's economic security through emigrating to the US. This is a dangerous path, unmerited by the data on immigrants use of public benefits (it is lower than native born Americans' use of public benefits) or their contributions to our tax revenue, excellence in science and the arts, and other vital areas of community success.

Widening the definition of public charge to utilization of benefits ignores the work, taxes, and other contributions immigrants are making, and makes a false, negative comparison between immigrants' drain on public resources compared to other Americans' use. It continues the spread of negative messaging to domestic audiences that has contributed to a significant rise in hate crimes, it increases trauma for immigrant families, and it is aimed at fixing a problem that data shows does not exist. In short, this is bad policy and should not be implemented.

As a private philanthropy, we know that 90% of human services funding comes from public dollars, and most of that originates in the federal budget. Our meager resources, while strategically deployed and working to their utmost, will fall far short of being able to make-up the cuts that this proposed rule, if implemented, would create.

United Way of King County is creating a community where people have homes, students graduate, and families are financially stable. The proposed rule undermines our efforts. All people in our county who work hard and play by the rules should be allowed to pursue their American Dream. With the anticipated harmful impacts on children, families, low-wage workers, and ripple impacts on the charitable sector -- due to reduced access to Medicaid, SNAP, and housing assistance -- United Way opposes the proposed public charge rule and respectfully requests your withdrawal of the rule. Thank you for your consideration.