

20 N. Wacker Drive
Suite 3118
Chicago, Illinois 60606
Telephone (312) 214-1521
Fax (312) 214-1529
www.vnafoundation.net

December 4, 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 VNA Foundation to express our strong opposition to 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 VNA Foundation is a private independent grantmaking foundation located in Chicago. Similar to our 105 year legacy as the Visiting Nurse Association of Chicago, the VNA Foundation serves medically underserved populations through grants to nonprofit home- and community-based organizations located in the metropolitan Chicago area. In FY '18, VNA awarded 54 grants totaling more than \$2.4 million.

As a foundation, we understand that investing in healthcare, nutrition, housing and other essential needs allows parents to work, children to stay in school, and families to contribute fully to our communities. Yet, the proposed rule misguidedly views such investments as costs that should be discouraged. For people working low-wage jobs, particularly, health and nutrition assistance helps them and their families be healthy, productive members of society. Multiple studies, in fact, demonstrate that providing certain safety net programs targeted by the proposed regulation, such as Medicaid and SNAP, actually "ends up benefiting children and society over the long run." ¹

¹ See Hoynes and Schanzenbach, "[Safety Net Investments in Children.](#)"

The proposed rule will also roll back the philanthropic community's investments. For decades we have funded opportunities that increased immigrant families' access to health and social services, improved community health and well-being, and reduced health disparities and illnesses. The impacts of the proposed rule will be deeply felt by the philanthropic sector, which has supplemented the government's responsibility to protect the well-being of those in this country, while also harming businesses that employ immigrants, schools that educate children, farmers and businesses that provide food, and the communities where immigrant families live and contribute.

By discouraging immigrant families from accessing benefits, the proposed rule would create a humanitarian crisis across this country. As a smaller foundation that prides itself on agilely responding to the varying needs of the Chicago area's medically underserved populations, we would be forced to divert all support to respond instead to the new crises created by this misinformed proposed rule. Funding toward prevention, education and ingenuity would suffer, as would – more importantly – the health and well-being of the communities we serve.

The VNA Foundation strongly opposes the proposed “public charge” rule. If implemented, it would harm millions of working-class immigrant families already in the U.S. at greater risk of hunger, poverty, homelessness, and other hardships—and destabilize communities across the country.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert N. DiLeonardi".

Robert N. DiLeonardi
Executive Director
VNA Foundation