



December 10, 2018

U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

RE: Notice of Proposed Rulemaking on public charge, published in the Federal Register on October 10, 2018

As leaders of the William T. Grant Foundation, we are writing to urge the U.S. Citizenship and Immigration Services in the Department of Homeland Security to withdraw the proposed change to the definition of a “public charge,” a change that would make it more difficult for immigrant-origin children to receive the services to which they are legally entitled and that would impair their health and development. Our opposition to this change is based on research that we have supported and other empirical work in this area, consistent with our mission to support research to improve the lives of young people.

A central focus of our grantmaking is research on how policies, programs, and practices can reduce inequality in youth outcomes. Our focus on inequality stems from an understanding that 1) inequality is excessive, both in comparisons of the U.S. to our global competitors and in comparisons to our own history; 2) excessive inequality is economically and socially harmful, as it drags down our productivity, breaks down social cohesion, reduces civic participation, and ultimately undermines our democracy; and 3) rising inequality is not inevitable, and our own history reveals many occasions and arenas in which the provision of public benefits have quelled the growth of inequality.¹

One area of particular concern is the inequality facing immigrant-origin children.² They constitute one fourth of the children and youth in this country. Research evidence on immigrants and low-income families suggests that the proposed rule change would increase inequality in their outcomes.

The proposed rule change would decrease benefits among eligible families, thereby contributing to poorer child and youth outcomes. Past research on SNAP indicates that it is associated with 20 to 40 percent reductions in food insecurity, and that food

¹ Gamoran, A. (2013). *Educational inequality in the wake of No Child Left Behind*. Spencer Foundation Lecture to the Association for Public Policy and Management, Washington, DC. Retrieved from: <http://www.appam.org/awards/spencerfoundation-lectureship>.

Putnam, R.D. (2015). *Our kids: The American dream in crisis*. New York: Simon & Schuster.
Bailey, M.J., & Danziger, S. (Eds.). (2013). *Legacies of the War on Poverty*. New York: Russell Sage Foundation.

² Suarez-Orozco, C., Yoshikawa, H., & Tseng, V. (2015). *Intersecting Inequalities: Research to Reduce Inequality for Immigrant-Origin Children and Youth*. New York, NY: William T. Grant Foundation.

insecurity has a cascading influence on children’s health and developmental outcomes.³ In addition, increased eligibility for SNAP in early childhood has been associated with positive outcomes in adulthood in both health and economic self-sufficiency.⁴ Thus a policy change that results in decreased benefits would likely increase inequality.

The proposed rule change is also likely to create a broader “chilling effect” among legally present immigrants who fear the real or perceived consequences of taking up services for which they are eligible. Almost 90% of children of immigrants are born in the U.S. They are citizens and eligible for benefits, but their receipt of benefits will depend on their immigrant parents. It should be noted that immigrants already have lower rates of enrollment in public programs than their native-born peers.⁵ A further alienation of immigrant families would exacerbate inequality in children’s outcomes.

In 1965, our country took a great step forward in enacting an immigration policy that for the first time in our history did not discriminate against immigrants because of their countries of origin. According to analyses from the Migration Policy Institute, the proposed rule risks taking us backwards in history by disproportionately affecting immigrants from Mexico and Central America while favoring those from Europe, Canada, Australia, and New Zealand.⁶ It would also imperil our current immigration policy’s ability to support family reunification by making it more difficult for immigrants legally residing in the U.S. to obtain green cards or sponsor family members. Moreover, research on children of immigrants suggests that their prolonged separation from parents harms family relationships and negatively influences children’s well-being.⁷ The proposed rule change would thus further aggravate racial and ethnic inequality in our society and unravel historic gains.

³ DePolt, R.A., R.A. Moffitt, and D.C. Ribar. 2009. Food Stamps, Temporary Assistance for Needy Families and Food Hardships in Three American Cities. *Pacific Economic Review*, vol. 14, pp. 445–473. Nord, Mark, and Anne Marie Golla. *Does SNAP Decrease Food Insecurity? Untangling the Self-Selection Effect*. Washington, DC: USDA, Economic Research Service, Economic Research Report Number 85, October, 2009.

Mabli, James, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos. Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security. Prepared by Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, August 2013. <https://fns-prod.azureedge.net/sites/default/files/Measuring2013.pdf>

Ratcliffe, C., S. McKernan, and S. Zhang. 2011. How Much Does the Supplemental Nutrition Assistance Program Reduce Food Insecurity? *American Journal of Agricultural Economics*, 93, no. 4, pp. 1082–1098.

⁴ Hoynes, H., Schanzenbach, D. W., & Almond, D. (2016). Long-run impacts of childhood access to the safety net. *American Economic Review*, 106(4), 903-34.

⁵ Suarez-Orozco, C., Yoshikawa, H., & Tseng, V. (2015). *Intersecting Inequalities: Research to Reduce Inequality for Immigrant-Origin Children and Youth*. New York, NY: William T. Grant Foundation.

⁶ Capps, R., Greenberg, M., Fix, M., & Zong, J. (2018). *Gauging the Impact of DHS’ Proposed Public-Charge Rule on U.S. Immigration*. Washington, DC: Migration Policy Institute.

⁷ Suarez-Orozco, C. & Suarez-Orozco, M.M. (2002). *Children of Immigration*. Cambridge, MA: Harvard University Press.

In conclusion, we thank you for your consideration of our comments, and we encourage you to reconsider the proposed rule change. Doing otherwise would only exacerbate inequality in our country.

Sincerely,



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President



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Senior Vice President, Program