November xx, 2018

Ms. Samantha Deshommes

Office of Policy and Strategy, U.S. Citizenship and Immigration Services

Department of Homeland Security

20 Massachusetts Avenue NW

Washington, DC 20529-2140

**RE: Docket No. USCIS-2010-0012 - Inadmissibility on Public Charge Grounds**

Dear Ms. Deshommes,

On behalf of the {insert name of organization}, I am writing to express our opposition to the U.S. Department of Homeland Security’s (DHS) proposed rule entitled “Inadmissibility on Public Charge Grounds” which could potentially deter many legal residents from accessing basic assistance for needs such as food, healthcare, and housing.

{insert name of organization} is responsible for {insert one or two sentences on mission of your organization and who your organization serves}. Our organization is concerned that this new proposed rule has the potential to contribute to additional growth of homelessness, food insecurity, and health emergencies across California by discouraging vulnerable populations from seeking necessary benefits and services.

{Insert one or two sentences about population experiencing homelessness in your service area, as well as recent successes in reducing and preventing homelessness/hunger/or medical emergencies} Healthcare, nutrition assistance, and subsidized housing are critical tools to ensure safe and healthy communities for all. As DHS is proposing to include the use of these benefits as grounds to be deemed a “public charge,” these preventative measures may create perverse disincentives for some of the people that we serve.

This new proposed rule may hinder our mission of {insert mission}. As such, we oppose this proposed rule and are concerned that its implementation will threaten the health and wellbeing of {insert name of jurisdiction} residents, regardless of citizenship status. We urge the Administration to withdraw this proposal and instead work with local health, nutrition, and housing providers to develop policies and practices that are safe, supportive, and contribute to healthy communities and residents.

In 2014, immigrant-led households in California paid $56.5 billion in federal taxes, $26.4 billion in state and local taxes, and exerted $237.8 billion in spending power.[[1]](#footnote-1) Despite their stimulus to the economy, immigrant households, who are equally as likely to be in the labor force as U.S. born citizens, have lower incomes than comparable non-immigrant households, leaving this population uniquely vulnerable to poverty and homelessness.[[2]](#footnote-2)

California is home to some of the highest housing costs in the country. A total of 57% of California’s immigrants are rent-burdened, meaning they spend more than 30% of their gross income on rent; many of these individuals and families are at risk of homelessness.[[3]](#footnote-3) Housing interventions like rental assistance and public housing are considerably more economical than the costs associated with people who have already fallen into homelessness. Between increased emergency room usage, higher volumes of calls to local first responders, and other factors, a person experiencing homelessness can cost local governments up to $60,000 annually.[[4]](#footnote-4) Immigrant communities are our neighbors, the engines of our local economies, and partners in our work to end homelessness, and as a local organization tasked with {reducing homelessness/providing healthcare/providing nutrition assistance}, we believe we must advocate for policies that allow them to access resources to prevent homelessness, instead of using these resources in a punitive manner.

The potential negative effects of this new proposal are far from trivial. Many families, even those not directly impacted by the rule, may disenroll from much-needed benefits, as fear and confusion among immigrant communities across the nation appears to have already resulted in benefit disenrollment prior to this proposed rule, according to recent findings from the Kaiser Family Foundation. [[5]](#footnote-5) The proposed rule has the potential to deprive children, some of whom are U.S. citizens and legal permanent residents, from receiving proper medical care, nutrition, and housing, which could negatively affect their growth and development. This rule change may push more Californians into homelessness by forcing immigrant families to forgo needed benefits and be more vulnerable to the emergencies and economic disruptions that can result in a family losing their housing.

We appreciate the opportunity to provide comment on this rule change. We look forward to working with the department to craft policies that ensure opportunity and safety for all residents of our communities.

Sincerely,

{insert signature of Executive Director}

{insert name of Executive Director}
{insert name of organization}

1. New American Economy. (2016). *The Contributions of New Americans in California.* [↑](#footnote-ref-1)
2. U.S. Census Bureau. (2017). *2012-2016 American Community Survey Five-Year Estimates*. [↑](#footnote-ref-2)
3. U.S. Census Bureau. (2017). *2012-2016 American Community Survey Five-Year Estimates*. [↑](#footnote-ref-3)
4. Flaming, D., Lee, S., Burns, P., & Sumner, G. (2013). “Getting Home: Outcomes from Housing High Cost Homeless Hospital Patients.” Los Angeles, CA: Economic Roundtable. [↑](#footnote-ref-4)
5. Kaiser Family Foundation. (2018). “Family Consequences of Detention/Deportation: Effects on Finances, Health, and Well Being.” [↑](#footnote-ref-5)