

November 27, 2018

RE: Comments on Proposed Regulation - Inadmissibility on Public Charge Grounds (DHS Docket No. USCIS-2010-0012)

To Whom It May Concern:

The Greenlining Institute strongly opposes the Department of Homeland Security's Notice of Proposed Rulemaking on public charge, published in the Federal Register on October 10, 2018. This proposal targets immigrant families whose economic and cultural contributions are deeply embedded into the social fabric of the United States. The proposed rule will impose an inaccurate and strikingly ambiguous determination process that will threaten the security of immigrant families. Furthermore, the inclusion of personal attributes to define who is likely to become a public charge makes the proposed process vulnerable to discriminatory practices. If passed, this policy will perpetuate inequities by race, income, age, and education.


The Greenlining Institute is a California-based, multi-ethnic policy organization committed to racial and economic justice. We strive to build a state and nation where communities of color thrive, and race is no longer a barrier to economic opportunity. Greenlining's coalition is largely comprised of immigrants and their descendants, many of whom were raised in mixed-status households.¹ Many of our staff and coalition partners relied on the strength of their families to overcome economic insecurity. These experiences, which are common among millions of immigrants across the nation, demonstrate the importance of public benefits to improving outcomes and opportunities for immigrant families, especially those living in communities crippled by the persistent effects of Jim Crow and anti-immigrant sentiment.

Moreover, this proposed rule will cripple California and the nation's economy. Ample studies prove that the United States benefits from the taxes immigrants pay and the money they spend on consumer goods and services.² Ten million immigrants reside in California, with 51 percent born in Central and Latin America and 31 percent born in Asia.³ California is also home to 9.3 million Americans with at least one immigrant parent. As consumers and entrepreneurs, immigrants generate billions of dollars for California's economy—the

¹ National Immigration Law Center. (2014). The Affordable Care Act and Mixed-Status Families. https://www.nilc.org/issues/health-care/aca_mixedstatusfams/

² Kosten, Dan. National Immigration Forum. (2018). Immigrants as Economic Contributors: Immigrant Tax Contributions and Spending Power. <https://immigrationforum.org/article/immigrants-as-economic-contributors-immigrant-tax-contributions-and-spending-power/>

³ Public Policy Institute of California. (2018). Just the Facts: Immigrants of California. <http://www.ppic.org/publication/immigrants-in-california/>

A decorative graphic at the top of the page showing a rural landscape with wind turbines, a barn, and a house on the left, and a city skyline with skyscrapers on the right.

fifth largest in the world.⁴ In 2015, 880,000 immigrant business owners accounted for 38.2 percent of all self-employed California residents and generated \$21.8 billion in business income.⁵ Conversely, immigrants pay more into public benefit programs than they account for, and are less likely to depend on public benefits compared to natural born citizens.⁶ The notion that immigrants partake in public benefits more than they contribute in taxes is patently false; in fact, they contribute far more and play a pivotal role in ensuring these programs continue to serve those in need.

This proposal will also reduce support for working immigrant families who disproportionately earn less than citizens. Among immigrant households in California, the median income in 2016 was \$60,100—24 percent lower than families with citizen head of households.⁷ Although immigrants are just as likely to be in the workforce as citizens, they still receive lower wages.⁸ Furthermore, limiting access to benefits like the Supplemental Nutrition Assistance Program (SNAP) will perpetuate a vicious cycle of malnourishment, poverty, and poor health. For example, in Asian American and Pacific Islander (AAPI) communities, where food insecurity impacts nine percent of Asian Americans and 24 percent of Native Hawaiians or Pacific Islanders—523,000 AAPI immigrant-led households depend on SNAP.⁹

The proposed changes have already begun to compromise our nation’s public health as immigrants withdraw from Medicaid and SNAP fearing that enrollment will jeopardize their status or that of their family members.¹⁰ The proposed rule will aggravate a host of public health concerns, from communicable diseases to emergency room admissions. Working immigrants may forgo Medicaid services and stop taking children for check-ups and vaccines, depleting much-needed revenue for providers who serve rural areas and immigrant-rich regions, alike.¹¹ Moreover, income instability and joblessness would increase the chance of immigrant families—including those with citizen children—losing their

⁴ Migration Policy Institute. (2018). Frequently Requested Statistics on Immigrants and Immigration in the United States. <https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states#Demographic>

⁵ USC Center for the Study of Immigrant Integration. California Immigrant Snapshot. <https://www.gcir.org/sites/default/files/resources/CA-ImmigrationSnapshot-web.pdf>

⁶ National Immigration Forum. (2018). Fact Sheet: Immigrants and Public Benefits. <https://immigrationforum.org/article/fact-sheet-immigrants-and-public-benefits/>

⁷ Public Policy Institute of California. Ibid.

⁸ Ibid.

⁹ Becerra, M. B., Mshigeni, S. K., & Becerra, B. J. (2018). The Overlooked Burden of Food Insecurity among Asian Americans: Results from the California Health Interview Survey. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6121379/>

¹⁰ Misra, Tanvy. (2018). Why Blocking Poor Immigrants Could Be Very Costly.

<https://www.citylab.com/equity/2018/09/why-blocking-poor-immigrants-could-be-very-costly/571087/>

¹¹ Ibid.

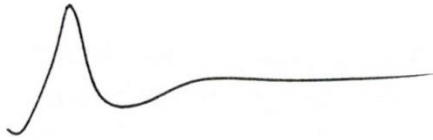


homes.¹² Reduced vaccination rates and access to preventative care could endanger the health of all, not just immigrants, and ultimately increase costs of our nation's health system rather than reduce them.

To require immigrant families to choose between accessing the American dream and accessing health care, nutrition, and shelter is a betrayal of our nation's core values.

On behalf of the Greenlining Institute, we strongly urge the Department of Homeland Security to reject this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Orson Aguilar'.

Orson Aguilar
President
The Greenlining Institute
orsona@greenlining.org
510-926-4005

¹² Misra. Ibid.