



RE: Comment Submitted via Regulations.gov (ID: USCIS-2010-0012-0001) by UUSJ

December 6, 2018

We, the Unitarian-Universalists for Social Justice, urge DHS/USCIS to cease its efforts to expand the "public charge" definition as proposed. To add SNAP, Medicaid and housing subsidies to the definition is short-sighted and lacking in compassion. (See full comments below.)

- Our faith calls us to affirm the inherent worth and dignity of every person. We believe immigrant and LPR applicants deserve temporary access to needed public assistance programs to become integrated and productive members of our communities.
- Deterring immigrant families from using publicly-funded health and nutrition programs puts our general public health at risk and may negatively affect the health of children who are US citizens in mixed-status families.
- Considering income below 125% of federal poverty guidelines as evidence of public charge status ignores our long history of welcoming immigrants who have started off at low-level entry jobs and then built a better life and contributed greatly to our society. (note immigrants in Fortune 500 company leadership and Nobel prize winners, e.g.).
- Indirect impact of the proposed expanded definition of public charge includes decreased employment and income for health care providers, decreased grocery sales, slowed economic growth and increased demands on safety-net charities. The value of this impact is estimated to far exceed the potential savings from reduced use of federal benefits.
- We have direct experience working with immigrant and refugee families that confirm that legal immigrants are hard-working, tax-paying full-time workers, often in sectors where US citizens do not seek employment. After initial use of SNAP, Medicaid and housing subsidies, they gradually move off such programs, the short-term use of which more than pays for itself in the medium-term through these families' contributions in taxes. The proposed nine-month trigger is too little time for many families to establish themselves in better-paying work.

Sincerely,

Robert W. Denniston
Board Chair
Unitarian Universalists for Social Justice



December 6, 2018

**UNITARIAN UNIVERSALISTS FOR SOCIAL JUSTICE COMMENT ON
PROPOSED DHS/USCIS REGULATORY CHANGE ON
INADMISSIBILITY ON PUBLIC CHARGE GROUNDS**

We, the Unitarian-Universalists for Social Justice (UUSJ), are writing to express our deep concern regarding the proposed regulatory changes by DHS/CIS to the definition of “public charge” to be used for decisions of inadmissibility and ineligibility to adjust status (DHS Docket No. USCIS-2010-0012).

UUSJ represents Unitarian Universalist values and voices at the Federal level, working in partnership with congregations and individual members nationwide. Our denomination has passed a *Statement of Conscience, Immigration as a Moral Issue (2013)*, and two Actions of Immediate Witness, in 2015 and again in 2018, that are directly relevant to this issue. We have both moral and practical reasons for our concern about the proposed change in definition of public charge.

We believe in the inherent worth and dignity of every person as part of our faith. To treat immigrants, both those legally here and those seeking admission, differently than native-born citizens with regard to their eligibility for needed public assistance programs is not acceptable. It means turning our back on vulnerable persons who usually need only a temporary supplement to their incomes on their road to becoming integrated and productive members of our communities. We accept and support the use of taxes we pay to help such families succeed here, as part of our belief in justice, equity and compassion in human relations.

We are particularly concerned about the proposed expansion of the scope of programs to be considered as a basis of public charge to include Medicaid. We regard the provision of health services as basic to the dignity, health and survival of human beings, and regard access to health care regardless of ability to pay a major responsibility of a developed country such as ours. Excluding immigrants from access to means tested medical care by making use of Medicaid a negative factor in being admitted for permanent residence in the US targets some of the most vulnerable members of society and puts the health of the entire community at risk.

In practical terms, such a complex change in definition of benefits to be taken into account to determine inadmissibility is already having a chilling effect on many persons who continue to be eligible for benefits but are uncertain about its applicability. This is causing them to withdraw from using needed public benefits which will have potentially significant impact on both public health and the US economy. Deterring families from using health and nutrition assistance programs (Medicaid, SNAP) for which they are eligible, though it may appear to save federal and local funds in the short



term will reduce the health and productivity of millions of adults and children. For young children, many of them US citizens in mixed-status families, reduced nutrition may negatively affect their performance for the rest of their lives, reducing their contributions to our society and economy. For those who develop serious illness owing to inadequate or foregone preventive care, our health care system will face increased costs as these ill persons become charity patients in the safety-net system. Deporting people living in the United States who develop unexpected serious health issues because of impeded access to affordable health care would simply be cruel.

Further, to consider persons with family income below 125% of the Federal Poverty Guideline as prospective public charges, when so many immigrants must start off with minimum-wage jobs and work their way up, is a barely disguised pretext to limit legal permanent residence to the relatively well-off and highly skilled. Ignoring our long history of immigrants building a better life here and contributing to our society even when they start with very little is short-sighted, to say the least.

Indirect impacts affecting US citizens include decreases in retail grocery sales, decreased employment for healthcare workers (many of whom are legal immigrants) and more expensive health care services for the general population (if new immigrant health care workers cannot gain legal status). Deterring eligible persons from using temporary public benefits to the extent that they must divert their discretionary income to cover food and medical services will reduce their general spending in the economy, slowing economic growth, and increase their need for supportive services funded locally, municipally or through safety-net charities. These indirect costs are, we believe, likely to exceed the potential savings of reduced use of federal benefits.

We have direct experience through our social justice work with immigrants and refugees yielding anecdotal evidence that legal immigrants here are hard-working, tax-paying full-time workers, sometimes engaged in more than one job, often in sectors where US citizens choose not to seek employment. Their initial low incomes are due to low wages, justifying their receipt of supplements such as SNAP and Medicaid. Yet, over time, the immigrants we have come to know are able to move to better-paying jobs that also offer benefits, and gradually are able to move off of the federal programs currently available. This temporary "boost" to tax-paying residents and their families more than pays for itself in the medium and long term. Shutting off this temporary assistance is both short-sighted and lacking in compassion.

We urge DHS/USCIS to cease its efforts to expand the "public charge" definition as proposed. If you have any questions, contact Charlotte Jones Carroll, at cjonescarroll@aol.com or advocacy@uusj.org.

Robert W. Denniston
Board Chair
Unitarian Universalists for Social Justice