[DATE]

*Submitted via www.regulations.gov*

Samantha Deshommes, Chief

Regulatory Coordination Division, Office of Policy and Strategy

U.S. Citizenship and Immigration Services

Department of Homeland Security

20 Massachusetts Avenue NW

Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2010-0012, RIN 1615-AA22, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds

Dear Sir/Madam:

I am writing on behalf of [your organization’s/agency’s name] in response to the Department of Homeland Security’s (DHS) Notice of Proposed Rulemaking to express our strong opposition to the changes regarding "public charge” published in the Federal Register on October 10, 2018 (CIS No. 2499–10; DHS Docket No. USCIS–2010–0012). [Sentence about why your organization/agency opposes the public charge rule.] We urge the rule to be withdrawn in its entirety, and instead that current, long-standing immigration policies continue to remain in effect.

Illinois is home to 1.75 million immigrants, and roughly one in four children in Illinois has an immigrant parent. [Insert information about your clients if applicable] [Your organization/agency’s name] is dedicated to ensuring that all of our community members have access to important public benefits, including housing and homelessness assistance, regardless of where they or their parents were born.

[INSERT paragraph describing your organization/agency, its mission, why this proposed rule and its implications are particularly urgent to you, and the experience in your community with housing and homelessness and related issues, such as access to public benefits like SNAP and Medicaid, and why safety net programs are so vital to ensuring strong and healthy communities. If you are a neighborhood organization, consider describing the immigrant populations in your community and, if you have them, consider including specific data on the populations you serve. If you cite data or studies, be sure to upload them as well, if possible, or, if not, to include a live link and ask that any cited materials be considered part of your comment.]

**All families should have a safe, affordable home regardless of immigration status**

Access to safe, affordable housing is crucial for ensuring a decent quality of life and a chance at upward mobility for immigrant families. Nonetheless, across the state of Illinois, and the entire country, there is a severe shortage of affordable rental homes.[[1]](#footnote-1) All families need a stable home so they can send their kids to school, pursue educational and job opportunities, and lead healthy, productive lives. The proposed rule only strives to make the housing crisis worse for immigrant families by forcing families to shy away from important benefits that are proven to increase the quality of life for all families and communities.

The long-term effects of housing instability and homelessness is especially striking in children, many of whom are U.S. citizens who are part of immigrant families. Research has shown that economic and housing instability [negatively impacts children’s cognitive development](https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF), leading to poorer life outcomes as adults.[[2]](#footnote-2) Housing instability is directly correlated to decreases in student retention rates and contributes to homeless students’ high suspension rates, school turnover, truancy, and expulsions, limiting students’ opportunity to obtain the education they need to succeed later in life.[[3]](#footnote-3)

[Insert stories about individual member’s struggles in finding affordable housing and the difference that having a stable home has.]

In spite of the national housing crisis, the proposed rule harms immigrants and their families applying for and receiving critical housing and homelessness assistance. As drafted, the rule departs from longstanding immigration policy where use of these critical, life-sustaining programs were not counted against immigrants and their families. Even worse, the rule specifically targets low-income immigrants, a population that already faces [substantial barriers](https://www.rwjf.org/en/library/research/2006/08/living-in-america.html) to housing.[[4]](#footnote-4) By chilling access to assistance from already at-risk groups, the proposed changes to the public charge rule threatens to plunge those already struggling even deeper into poverty, making their route to a better life [nearly impossible](https://www.theatlantic.com/business/archive/2017/04/economic-inequality/524610/?utm_source=fark&utm_medium=website&utm_content=link&ICID=ref_fark).[[5]](#footnote-5)

Immigrant families, faced with the threat of separation, will be forced from housing assistance programs under the proposed rule, causing increased rates of homelessness and unstable housing among an already vulnerable population.[[6]](#footnote-6) Reduced access to other work supports like health care or nutrition will also make it harder for this at-risk population to pay rent or remain in private housing. Rather than punishing immigrant communities for the national housing crisis, we should instead ensure that every family, regardless of immigration status, has access to one of the most basic of human rights: a safe place to call home.

**The proposed rule chills access to housing for immigrant communities and increases costs to safety net providers**

The proposed rule is already creating a chilling effect—making eligible individuals and families afraid to access vital benefit programs and undermining access to critical health, food, and housing supports. It will likewise discourage immigrants from applying for permanent status, a move that has been shown to improve an immigrant’s earnings and ability to remain in housing.[[7]](#footnote-7)

[Illustrate the chilling effect by inserting a few sentences describing stories of community members that have already raised concerns about the proposed rule’s application and impact on their families and the impact that deportation/family separation has on your community. For example, you can include stories of tenants that have already decided to disenroll, or that have taken other actions in anticipation of this rule.]

**DHS should continue with the current, longstanding public charge test and no additional programs should be included in the public charge determination**

We urge DHS to immediately withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of immigrants to support themselves and their families in the future. If we want our communities to thrive, everyone in those communities must be able to stay together and get the care, services and support they need to remain healthy and productive.

In the proposed rule, DHS specifically asks about unenumerated benefits— including whether additional programs should explicitly be counted, and whether use of other benefits should be counted in the totality of circumstances. **We strongly oppose adding any additional programs to the list of counted programs, or in any way considering the use of non-listed programs in the totality of circumstances test.** No additional programs should be considered in the public charge determination. The programs enumerated in the proposed rule already go far beyond what is reasonable to consider and will harm millions of immigrant families. The addition of any more programs would increase this harm to individuals, families and communities.

As we stated above, [brief restatement of some of your arguments as to why the proposed rule will hurt immigrants, their families, and the U.S. as a whole].

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact [FILL IN] to provide further information.

[Name]

[Title]

[Insert contact information and add signature line if desired.]

[If submitting as a PDF, consider attaching any studies, reports, or other sources of information you referenced in your letter]

1. *See e.g.* Joint Center for Hous. Studies of Harv. Univ., The State of the Nation’s Housing (2018), <http://www.jchs.harvard.edu/sites/default/files/Harvard_JCHS_State_of_the_Nations_Housing_2018.pdf>. [↑](#footnote-ref-1)
2. Heather Sandstrom & Sandra Huerta, The Negative Effects of Instability on Child Development: A research Synthesis (2013), <https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF>. [↑](#footnote-ref-2)
3. *See* Mai Abdul Rahman, The Demographic Profile of Black Homeless High School Students Residing in the District of Columbia Shelters and the Factors that Influence their Education 55 (Mar. 2014) (Ph.D. dissertation, Howard University), available at <http://gradworks.umi.com/3639463.pdf> (citations omitted). [↑](#footnote-ref-3)
4. Robert Wood Johnson Found., Living in America (Katherine E. Garrett ed., 2006), <https://www.rwjf.org/en/library/research/2006/08/living-in-america.html>. [↑](#footnote-ref-4)
5. Gillian B. White, *Escaping Poverty Requires Almost 20 Years With Nearly Nothing Going Wrong*, Atlantic (Apr. 27, 2017), <https://www.theatlantic.com/business/archive/2017/04/economic-inequality/524610/?utm_source=fark&utm_medium=website&utm_content=link&ICID=ref_fark>. [↑](#footnote-ref-5)
6. Pratt Ctr. for Cmty. Dev., Confronting the Housing Squeeze: Challenges Facing Immigrant Tenants, and What New York Can Do (2018), <https://prattcenter.net/research/confronting-housing-squeeze-challenges-facing-immigrant-tenants-and-what-new-york-can-do>. [↑](#footnote-ref-6)
7. *See* Robert Lynch & Patrick Oakford, Center for Am. Progress, The Economic Effects of Granting Legal Status and Citizenship to Undocumented Immigrants 4 (2013), https://cdn.americanprogress.org/wp-content/uploads/2013/03/EconomicEffectsCitizenship-1.pdf. [↑](#footnote-ref-7)