



December 10, 2018

Mark Phillips
Residence and Naturalization Division Chief
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security

Submitted via <http://www.regulations.gov> (Docket #2018-21106)

RE: Inadmissibility on Public Charge Grounds

Dear Mr. Phillips,

The Arab American Institute strongly opposes the rule changes detailed in Federal Register #2018-21106. The changes that the Department of Homeland Security (DHS) proposes would re-define and broaden the term “public charge” order to deem greater numbers of immigrants inadmissible, and will place undue burdens on those seeking permanent legal status in the United States, especially families with children.

Existing federal law and regulation already place strict conditions on lawful immigrants for receiving Medicaid benefits. By unnecessarily expanding the definition of “public charge,” DHS is punishing families for accessing congressionally allocated food, health care, and housing assistance. As a national organization representing the interests of 3.7 million Arab Americans, we are regularly coordinating with a robust network of community-based organizations. One such group based in Michigan, ACCESS, is the nation’s oldest and largest Arab American social service agency. Serving thousands annually, ACCESS profession staff have reported that families have already un-enrolled from public assistance programs, fearing that participation would endanger their paths to citizenship:

The proposed changes to public charge have already demonstrated harm to our clients through the chilling effect. Individuals and families seeking basic, daily needs have expressed fears of experiencing punitive measures despite not meeting the criteria for the proposed rule. As a result, we are seeing lower participation in services that are critical for survival, growth, and long-term self-sustainability. If this rule is implemented, this impact would exponentially harm immigrant communities, directly and indirectly, decreasing their participation in society.

Because of the damage these changes would do to children across the country, the American Academy of Pediatrics also opposes the proposed rule.

Congress, pursuant to existing regulations, presently allows narrow categories of immigrants to benefit from public assistance with the understanding that immigrants are not intrinsically divided into ‘contributors’ and ‘public charges.’ Instead, tailored public assistance is crucial to help many families to become contributors to this country for generations to come. However, the proposed changes will simply prioritize the wealth of immigrants over all else. By excluding immigrants from legal admission because of considerations such as English language ability, medical pre-conditions, or family situations, the rule changes will unnecessarily turn away deserving immigrants from lawful entry or permanent status.

Sincerely,

A handwritten signature in black ink, consisting of several vertical, slightly wavy lines followed by a horizontal stroke that curves upwards and to the right.

Maya Berry
Executive Director