



## Submitting Comments on Proposed Public Charge Rule

### Background

The Trump administration has proposed dramatic changes to the public charge rule that would make it more difficult for immigrants to obtain a green card if they use a range of public benefits.

The rule would expand the types of public benefits that could be considered in determining whether an immigrant who is applying for a green card is likely to become a public charge to include Medicaid, SNAP benefits and Section 8 vouchers, all benefits that help individuals and families – including many who are working – meet basic needs.

While only benefits received by the individual applying for a green card will be considered, the rule will have a chilling effect on families who will forego benefits for eligible family members (including citizens and lawful permanent residents) who will not be directly affected. In fact, we have already heard of families asking to have benefits stopped, even though they will not be affected by the rule.

The rule change is estimated to impact 26 million people across the country, including 9 million children. These are the number of people in families that include one non-citizen who may need SNAP to help keep food on the table, Medicaid to access health care, housing assistance to keep a roof over their family's head and cash assistance when they are unable to work. Many of those who receive these benefits are working, but do not earn enough to make ends meet.

### Comments due December 10, 2018

Comments can be submitted on line through the Federal eRulemaking Portal ([Regulations.gov](https://www.regulations.gov)). Search for DHS Docket No. USCIS-2010-0012 “Inadmissibility on Public Charge Grounds”.

The Protecting Immigrant Families (PIF) Coalition has prepared fact sheets describing “Helpful Ways to Approach your Public Comment” that suggest information to include in your comments as well as details about submitting them. There is one for comments from [Organizations](#) and another for [Individuals](#).

Your comments do not have to be long or detailed, but it's important to join the tens of thousands of people across the country who have sent in objections to this harsh proposed rule. Refer to the PIF fact sheet. You may also want to include the following RI specific information:

**The number of potentially impacted Rhode Islanders is estimated as 73,500.** This is the number of people in families with at least one non-citizen and earned income of less than 250% of the federal poverty level (\$52,000 for a family of 3). This includes both pregnant women and children who are eligible for Rite Care and would be directly impacted by the proposed change since receiving this critical health care benefit could threaten their ability to get a green card if the rule is finalized. And it includes

the chilling effect on individuals who will forego receiving RIte Care and SNAP, even though they will not be directly impacted.<sup>1</sup>

**The ‘chilling effect’ of the proposed public charge rule will not only mean that more Rhode islanders will be hungry or less healthy, as families forego enrolling in SNAP or Medicaid, but will have an economic impact on our state as a whole.** If 15% of eligible individuals dis-enroll from these programs, our state will lose \$39 million in federal funds. The loss of these federal funds has ripple effects to businesses and workers. Loss of SNAP funding means a reduction in spending in grocery stores. Reduction in Medicaid enrollment means losses to hospitals and doctors. The ripple effect of a 15% drop in enrollment is estimated at \$75 million for our state. If 35% of individuals dis-enroll, the loss of federal funds rises to \$90 million and the potential economic ripple effect is \$175 million.<sup>2</sup>

### **Want More Information?**

You can find much more information about the proposed rule, details of the impact on different populations (e.g., people with disabilities, seniors) and on health, nutrition and other factors at the Protect Immigrant Families website: <https://protectingimmigrantfamilies.org/>.

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<sup>1</sup> Manatt. <https://www.manatt.com/Insights/Articles/2018/Public-Charge-Rule-Potentially-Chilled-Population>

<sup>2</sup> The Fiscal Policy Institute. <http://fiscalspolicy.org/public-charge>