



45 Broadway, Suite 2201 | New York, NY 10006  
(212) 967-0322 | [www.unhny.org](http://www.unhny.org)

October 31, 2018  
Samantha Deshommes  
Department of Homeland Security  
20 Massachusetts Avenue NW  
Washington, DC 20529-2140

Re: Comments on “Public Charge” Rule, DHS Docket No. USCIS-2010-0012

Dear Ms. Deshommes,

On behalf of United Neighborhood Houses of New York, I write to offer comments in opposition to the proposed “Public Charge” rule. United Neighborhood Houses (UNH) is the association 40 nonprofit settlement houses and neighborhood centers in New York City and two in upstate New York reaching over 765,000 New Yorkers every year. Our network strongly urges the Department of Homeland Security (DHS) to drop the proposed changes to the Public Charge rule and maintain existing standards that protect immigrants from discriminatory practices. It is clear that the proposed rule directly attacks immigrant families by intimidating them from applying for or continuing to enroll in public benefits that their contributions to society otherwise entitle them to.

Settlement houses are deeply embedded into the communities they serve. As a result, staff within our network have been hearing that the proposed policy is causing fear and confusion among immigrant communities. We know that families already feel under pressure to choose between applying for needed benefits and compromising their ability to obtain visas or full citizenship. As some of the largest human services providers in New York, settlement houses promote and facilitate the uptake of public benefits among their program participants as a key piece of their holistic approach to strengthening communities. A high volume of their program participants effectively use services that would be impacted by the proposed policy – such as Public Housing, Section 8 Vouchers, SNAP, and Medicaid – to lead productive lives and contribute to the overall wellbeing of their neighborhoods.

While the proposed policy would most directly affect people applying for a green card through a family-based petition where Public Charge is relevant, the consequences go much further. A new report entitled “Impact of Public Charge” states that 24 million people in the United States are likely to be frightened and confused about the potential consequences of applying for food, health, and housing programs (Fiscal Policy Institute, 2018). This fear would extend far beyond people who may be subject to the Public Charge test. It would harm entire communities as well as the infrastructure that serves the entire American population, regardless of citizenship status. In New York alone, 2.1 million people live in a household with at least one non-citizen immigrant, and where someone in that family has received one of the public benefits named in the public charge rule (Fiscal Policy Institute, 2018). Additionally, public uptake of benefits serves as an important economic stabilizer. Widespread withdrawal from these programs would cause ripple effects across multiple industries, stunting economic growth that stems from individuals and families that effectively utilize homelessness prevention, public health insurance, and nutrition subsidies.

In short, deliberately suppressing immigrants from accessing public benefits will have a detrimental impact on our country’s social, political, and economic well-being. In coalition with other stakeholders from across the country, we join in calling the Administration to represent the interests of all Americans by protecting immigrants from the harmful effects that the Public Charge rule would have. We urge DHS to withdraw this proposal to prevent the long-term negative repercussions on the health, development, and economic outcomes of current and future generations.

Sincerely,  
Susan Stampler  
Executive Director