



November 27, 2018

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 Ms. Deshommes:

Health Center Partners of Southern California represents 16 primary health care organizations providing comprehensive medical, dental and behavioral health care to nearly one million patients in San Diego, Riverside and Imperial counties. We write today, on behalf of the network and health center patients to **strongly oppose the Department of Homeland Security's proposed rule change to "public charge,"** which will undermine access to essential health care, nutrition, and housing assistance for eligible immigrants and their family members, and to **formally request DHS withdraw this harmful proposal.**

The proposed rule has caused a widespread "chilling effect" that encourages families to withdraw from benefits due to fear. Some recipients are very confused and assume they no longer have access to these services even though no laws regarding their eligibility have been changed. This fear stems from misinformation and confusion about how this law could impact the lives of their families or themselves, causing an increase in mental health

issues. Immigrants are going without treatment because of fear, while fear and anxiety are exacerbating the mental health issues these patients have.

Additionally, the rule would force immigrant families to make an impossible choice between meeting their basic needs and pursuing a permanent future in the United States. Fear of immigration consequences, and uncertainty over who this rule applies to, will cause and has already caused immigrant adults to forgo essential benefits, and to remove their children from programs they are legally eligible to receive. These programs have significant consequences on families' well-being and long-term success by addressing economic security, health, and hunger. The panic created by the proposed rule goes much further than any one person who may be subject to the "public charge" test, damaging whole communities and the infrastructure that serves all of us.

Access to Care

As the primary care safety net for San Diego County, our 16 member's patient populations include a significant number of immigrant families who will be harmed by the proposed rule's chilling effect, whether the rule applies to them or not. The fear created by these rules extends far beyond any individual who may be subject to the "public charge" test. It is discouraging many immigrant families from accessing benefits for which they are eligible.

In San Diego County, this proposed change could affect nearly 500,000 people – or nearly 15% of the population. In a time where we are working diligently to improve health outcomes in our communities, this rule change would negate those efforts and return us to the days of patients delaying needed care and seeking that care in the highest cost center possible, our local emergency departments.

Population Health Outcomes

Health Center staff have already reported anecdotal decreases in service utilization due to fears stemming from the leaked draft and final regulations. Parents are not keeping their



children on regular vaccination schedules, preventive care has decreased, and patients with chronic diseases are skipping their appointments. If this rule is finalized as drafted, it's very likely HCP health centers will see an increase of uninsured patients, forcing a cut in patient services. Since 2013, the uninsured rate in California has fallen from 17% to under 7% in 2017. These coverage gains have allowed California's families to access regular health care and lead healthier lives. Healthy families are better able to assimilate and contribute to the U.S. economy; It is vital that health center patients and their families continue to access medical care and other social services without fear of adverse immigration consequences. The Trump administration's rule change will threaten the health of millions who receive critical care through programs like Medicaid.

Health Center Partners of Southern California strongly opposes efforts to deter, penalize, or stigmatize people who are eligible for public benefits programs from accessing those services; and is against imposing immigration consequences for using benefits that they are legally entitled to receive. **For these reasons, the Department of Homeland Security should immediately withdraw its current proposal and dedicate its future efforts to advancing policies that strengthen the ability of immigrant families to support themselves in the future, and to contribute to our great nation.**

Thank you for the opportunity to submit comments regarding this proposed rule change. Please do not hesitate to contact our Chief Experience Officer, Vernita Todd, (vtodd@hcpsocal.org | 619.542.4334) to provide further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Henry N. Tuttle".

Henry N. Tuttle
President & CEO

Submitted via www.regulations.gov - 11.28.18