

Dear partners,

As you may have heard, the federal government recently proposed a rule that would make it more challenging for immigrants to legally stay in our country. The rule, if implemented, would penalize immigrants who participate in a wide range of public benefits programs, counting their participation as a mark against them that harms their chances that their visa or application for citizenship is approved.

Among other harms, this rule would hurt our nation's effort to build a skilled workforce. Though education and workforce funds are not included in the list of benefits counted against people, we know that many people will turn away from all public programs for fear of immigration consequences. Furthermore, programs like SNAP and Medicaid provide vital support to people that makes it possible for them to participate in education and training. You can read more analysis of why this rule will be harmful through the National Skills Coalition and the Protect Immigrant Families Coalition.

The Jobs Council is joining a national effort to rally comments against this awful proposed rule. We want you to join us. Please consider submitting a comment stating your opposition to the rule - either on behalf of your organization, or as an individual. The goal is to get over 100,000 comments in by the December 10 deadline. You can start your own using the attached template!

This proposal comes at a time when attempts to support immigrants and refugees have been under attack from all angles. We've seen outright violence, from Pittsburgh to the Mexico-Honduras border. This proposal, while it appears at first to be bureaucratic, represents a thinly veiled, structural attack against both immigrants and the social safety net. We must fight back on all fronts. Opposing this rule is one way to speak out today.

Submit your comments at <https://www.regulations.gov/comment?D=USCIS-2010-0012-0001>

Please contact us with any questions, comments, or requests!

Sincerely,

Mari Castaldi
Director of Policy and Advocacy
Mari@cj.net

TEMPLATE

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

[REDACTED]

[REDACTED]

Re: Opposition to Proposed Changes in Public Charge Policies

Dear Samantha Deshommes,

[REDACTED] strongly opposes the proposed changes to federal policies regarding the public charge. The proposed regulation would enact extensive and far reaching damages on individual, local, state, and federal government and stakeholder efforts towards meeting workforce training and education goals. The proposed rule changes will further entrench barriers to self-sufficiency for vulnerable populations and disincentivize job seekers from enrolling in skill building education and training programs, ultimately damaging our nation's effort to build a skilled workforce.

Many low income people seek and participate in workforce development and education programs to obtain licenses, certificates, or degrees in order to improve their earnings potential and achieve sustainable, prosperous, family-supporting careers. While workforce development and educational services are not among those discouraged through these proposed rule changes, many people may be scared to seek out those services based on their perception of the intent of this rule. Furthermore, many people who seek professional development rely on other public benefits in order to be successful in their education or training. In sum, both of these dynamics will disincentivize low-skill individuals from engaging in pathways to self-sufficiency through higher wage earnings. For example,

The people that the Department of Human Services prioritizes for public benefits assistance services (including low-income, low-skill, or low-literacy adults) are also priority populations identified by our organization [REDACTED]

[REDACTED] for [REDACTED]. These program participants need opportunities to build towards obtaining licenses, certificates, and degrees in order to achieve sustainable, prosperous, family-supporting careers. [REDACTED]

It is clear that the intent of these proposed policy changes is to punish people who utilize public benefit programs. However, if the federal government wishes to reduce reliance on public benefits, it should instead increase resources that go towards workforce development and help advance strategies that promote access employment as a pathway out of poverty. This proposed policy would do the opposite - it would further entrench barriers to financial stability such as housing instability, chronic unemployment, and hunger.

[REDACTED] urges the Department of Homeland Security to reject and withdraw the proposed changes to existing public charge regulations and continue to welcome and allow immigrants supported opportunities for professional and educational advancement and overall well-being.

Thank you for your consideration.

Sincerely,

[REDACTED]