



Office of Mayor Ted Wheeler
City of Portland



Office of Chair Deborah Kafoury
Chair of Multnomah County

December 10, 2018

Samantha Deshommès, 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 # USCIS-2101-0012

Ms. Deshommès,

Multnomah County and the City of Portland stand together in strong opposition to the Department of Homeland Security's proposed changes to "public charge" rules. The proposed policy will force immigrants hoping to stay in the country permanently to choose between receiving vital health, nutrition or shelter assistance and their future documentation status. Hard working families here in our community would no longer be able to access basic human services including prenatal care, immunizations and Women, Infants and Children nutrition programs without risk. Children who are United States citizens would be denied help at their time of greatest need.

This is unacceptable. These proposed changes put our whole country at risk.

We have already seen the impacts of these proposed changes in our communities, even though it has not taken effect. Families accessing critical services **they are legally entitled to** are concerned for their safety and are questioning the wisdom of applying for, or continuing, services. Adults are removing themselves from services, while cautiously maintaining services for their children. Applications are left incomplete for fear that program files are not confidential. These actions have repercussions: data show that the very services being rejected improve community wide health, economic, and school outcomes. They are investments in our shared future, not handouts.

While the entire proposed rule is inconsistent with our joint vision of inclusion, specific concerns must be called out:

- Expanding programming subject to public charge (to include health, nutrition, and housing programs) is unfair, unsafe, and un-American. DHS estimates that an additional 400,000 immigrants already in this country would be subject to the new

requirements. These are families who came to the U.S. to forge a new life, not to become dependent on benefits and live in poverty.

- The proposal to change the guidelines for calculating a public charge determination from those who are ‘primarily dependent’ on federal cash assistance to focusing on those who use any combination of federal benefits that total no more than 15 percent of federal poverty guidelines is an unnecessary and unfair change in scope. The minimal financial support provided by federally-funded benefits does not promote dependency, it is a safety net for vulnerable families and should not be linked to threats of deportation.
- The proposed expansion of factors permissible to consider when determining if an individual is ‘likely to become a public charge’, is racist and not reflective of the United States’ unique and proud immigrant history. Limits on an individual’s age, number of children, English language proficiency, employment history, and medical conditions are not reflective of the United States’ values and the human and civil rights that have been won over the past 60 years. These limits also do not encourage the kind of migration that adds diversity, creativity and passion to our nation’s future.

This proposed change imperils not only the health of children and the likelihood they grow up prepared for a productive future, it jeopardizes the health of our nation. Our country was built on a strong sense of democracy. It has thrived with the promise of liberty and justice for all. We are made stronger by the limitless potential of all our residents and our policies need to reflect those values.

Elected officials, staff and residents of our community stand with immigrant families experiencing poverty. We recognize their humanity and value them as our neighbors and friends. We will continue to oppose this, and any other attempt to intimidate our community’s families based on their documentation status, age, family composition, English language proficiency, income, or medical condition.

If finalized, the rule would impact millions of immigrant families hoping to secure their permanent future in this country. States and localities would also be negatively impacted, due to decreased participation in programs that improve the health and well-being of their communities. Not only does this proposal encourage discrimination, it is inconsistent with United States values and impedes the creation of healthy communities and the skilled and diverse workforce our country needs to be successful in the future.

We urge the Trump Administration to immediately withdraw its proposal.



Deborah Kafoury
Multnomah County Chair



Ted Wheeler
City of Portland Mayor