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CONTACT: Alexandra Soto, Outreach Coordinator, Spring Institute for Intercultural Learning Phone: 303.863.0188, asoto@springinstitute.org

PROPOSED CHANGES TO PUBLIC CHARGE WILL DAMAGE ECONOMY AND AMERICAN VALUES

Denver, CO—Spring Institute for Intercultural Learning opposes the Trump Administration’s proposed rule changes for evaluating immigration applications. If implemented, the new “public charge” test would apply to anyone who simply receives assistance with health care, nutrition, or housing, rather than individuals likely to be primarily dependent on government cash assistance or long-term institutionalization. The proposed rule changes would dramatically alter longstanding U.S. immigration policy in favor of wealthier immigration applicants.

“This shift to reject the applications of individuals who are not wealthy at the time of applying for a visa or green card not only flies in the face of long-standing American values as a land of opportunity for those who do not enjoy economic opportunity or success in their home countries,” said Paula Schriefer, President of Spring Institute, “but it also will have the unintended consequences of stifling economic growth in the long term.”

The U.S. economy is heavily dependent on immigrant labor at all levels, from high-skilled engineers, medical professionals and IT specialists, to low-skilled agricultural, manufacturing, hospitality and construction workers. These sectors will suffer from the deprivation of traditional flows of immigrant workers in both the short and long term.

Spring Institute’s public comment submitted for public record can be read in full below.

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Spring Institute for Intercultural Learning is a nonprofit organization with a mission to empower people and organizations to succeed across languages and cultures. To find out more, visit our website at <http://www.springinstitute.org/> and follow us on [Facebook](#).

December 7, 2018

Re: DHS Docket No. USCIS-2010-0012

Submitted via www.regulations.gov

Spring Institute for Intercultural Learning opposes the proposed rule changes to federal policies regarding the public charge determination. As a provider of adult education and pre-employment training to the immigrant and refugee population of Greater Denver for nearly 40 years, it is our strong view that the proposed rule changes would have a detrimental effect not only on the immigrant population, but also on American employers and our larger society. While participation in federally-funded workforce and adult education programs are not included in the benefits that will be considered for a public charge determination under the proposed rule changes, the expansion of benefits to include many critical wrap-around or supportive services important for individuals and their family members will severely limit the ability and willingness of immigrants to participate in workforce and adult education programs. Likewise, while refugees and asylees are not directly subject to the public charge rules, they will be negatively impacted due to poor education about the rules, a well-founded fear that use of benefits may be held against them in the future, and the impact on family members who are not exempt from the public charge rules. Finally, the emphasis on providing visas and permanent legal status only to individuals who can demonstrate a much higher level of wealth than in the past, is in direct contradiction to long-standing American values as a land of opportunity and will have negative consequences for our current and future economic growth.

Spring Institute's specific concerns about the proposed rule changes follow:

1. The proposed rule changes would have the immediate effect of reducing participation by immigrants in state and local workforce and adult education programs and deprive our employers of a critical portion of our workforce

Immigrants, like native-born citizens, often need to obtain additional education or credentials to access the jobs that are in high demand in our state. Spring Institute's President and CEO is an active member of Denver's Workforce Development Board, and knows first-hand the demand for employees with middle or high level skills in sectors that are in most need of employees and which provide sustainable wage jobs. These include health care, construction, education, and IT, among others. Many immigrants need access to language classes or post-secondary educational opportunities to fill in-demand jobs and many will be unable to do so if participation in supportive services necessary for their participation is now going to be considered in a public charge determination. This includes participation in non-emergency Medicaid, federal housing

assistance, and the Supplemental Nutrition Assistance Program--all of which are key supportive services that allow individuals to invest in their education and training until they are able to obtain higher wage jobs. These services are investments in individuals, whether native-born or immigrant, that are more than recouped in future income and tax generation. Moreover, the proposed rule now places greater emphasis on the individual's level of income or employment status at the time of applying for permanent legal status or a visa, which will greatly reduce the number of highly talented and motivated individuals from being allowed to live and work in the U.S., depriving employers and our communities of individuals who can become financially successful with a limited investment in their education and skills.

2. The proposed rule changes will have a negative impact on families of immigrants and refugees, particularly children and future generations

First and foremost it is critical to understand that implementing rule changes that will hurt some immigrant parents will necessarily negatively impact their children. Spring Institute has been running programs to support the healthy development and school readiness for young immigrant and refugee children and their families for over eight years. We know how critical access to benefits by the parents is to the success of children and their ability to have a healthy, nutritional diet, to have appropriate and positive engagement with the parents, and to get a good start in school. The published rule change also asks for specific comment on the potential impact of including CHIP in the public charge test and whether use of public benefits by lawfully present children should count against immigrant parents when they adjust status to permanent residents. Spring Institute resoundingly objects to both the inclusion of CHIP in the public benefit determination and the use of benefits by children in future adjustment of status applications. There is strong documented evidence that the receipt of benefits allowing children access to health care and nutritional food are major contributing factors to the future success and integration of those children.

Moreover, beyond families and children who would be directly impacted by the proposed rule changes, expanding the public charge determination will deter many immigrant and refugee households from accessing essential services out of fear it will negatively impact their immigration status or the status of family members still attempting to immigrate. In a broader environment of negative rhetoric toward the immigrant and refugee community, we already hear that immigrant and refugee families are not willing to apply for benefits to which they are entitled out of fear and confusion regarding which programs and populations are considered.

3. The proposed rule changes will shift immigration authorization based on pre-existing wealth, depriving the United States of its traditional inflows of immigrants with the motivation and talent to work hard for their children and future generations.

The proposed rule would alter the public charge determination dramatically, applying it to anyone who simply receives assistance with health care, nutrition, or housing rather than applying it to individuals who are likely to be primarily dependent on government cash assistance or long-term institutionalization. This shift drastically increases the scope of who can be considered a public charge to include not just people who receive benefits as the main source of support, but also people who use basic needs programs to supplement their earnings from low-wage work. This shift to reject the applications of individuals who are not wealthy at the time of applying for a visa or green card not only flies in the face of long-standing American values as a land of opportunity for those who do not enjoy economic opportunity or success in their home countries, but it also will have the unintended consequences of stifling economic growth in the long term. The U.S. economy is heavily dependent on immigrant labor at all levels, from high-skilled engineers, medical professionals and IT specialists, to low-skilled agricultural, manufacturing, hospitality and construction workers. These sectors will suffer from the deprivation of traditional flows of immigrant workers in the short term and they will suffer from the loss of many successful future children of immigrants. There is a long history of immigrants who make tremendous sacrifices doing hard, low-paying work here in the U.S. to enable their children to get an education and become successful Americans. There is also a long history of immigrant children coming to the U.S. to achieve tremendous success and innovations during their lifetimes. One need only look at the statistics regarding Nobel prize awardees from the United States to understand how important the immigrant population has been to American innovation and economic success. According to National Geographic magazine, 63% of U.S. Nobel Prize winners in medicine were born abroad, as were 35% of prize winners in physics and 32% in chemistry.

Hence, immigrant populations have made significant contributions to this country and they are vital to members of our community. Therefore, we urge you to eliminate the proposed changes to the public charge determination so that *everyone*, regardless of nationality, race, ethnicity, gender, religion, and socioeconomic class has the right to rebuild their lives and contribute their skills meaningfully to our economy. This is precisely what it means to be an American and what the overwhelming majority of immigrants seek to do.