



December 19, 2025

Submitted via www.regulations.gov

Kristi Noem
Secretary of Homeland Security
Washington, D.C. 20528

Re: DHS Docket No. USCIS-2025-0304, U.S. Citizenship and Immigration Services

I am writing on behalf of Spring Institute for Intercultural Learning in response to the Department of Homeland Security's (the Department) Notice of Proposed Rulemaking (NPRM) to express our strong opposition to the changes regarding "public charge," published in the Federal Register on November 19, 2025.

For nearly 50 years since its founding in 1979, Spring Institute has promoted the social and economic integration of the diverse international newcomers who contribute so much to Colorado's cultural vibrancy and socioeconomic vitality. Through a range of programs including English language and digital skills training, career counseling, healthcare resource navigation, early childhood home visiting, and youth engagement, we support thousands of immigrant and refugee families each year in achieving educational goals, pursuing workforce opportunities, and attaining economic success and mobility as Coloradans.

Immigrants to Colorado from all backgrounds are crucial to our shared prosperity, paying \$7.7B in taxes and wielding \$21.3B in spending power annually. Hundreds of millions of those taxes are paid by Coloradans who are undocumented, subsidizing vital public programs from which they are personally excluded. Our staff work hard to establish trusting advisory relationships with clients/participants to facilitate full engagement in our programs and in other facets of community life, bolstering their important and varied roles in our local society and economy. Fear of undue suspicion, unjustified animosity, needless aggression, arbitrary surveillance, and unwarranted interference by the government have deeply concerning chilling effects on service and civic engagement by the peaceful, ambitious, and hardworking Coloradans that our programs are proud to serve. We routinely encounter clients, including expectant mothers and families with small children, who, despite meeting eligibility, are apprehensive about applying for benefits such as nutrition assistance due to misgivings about being targeted with hostile government scrutiny and persecution. The proposed rule will only exacerbate and further justify such concerns.

While long-established, the "public charge" inadmissibility test is conceptually misguided in that it ignores the stimulus and saving effects of granting cost-effective public benefits to immigrants whose strong motivation to participate in our economy drives U.S. innovation and competitiveness in the long term. Implementation of the proposed rule, broadening discretion in how this problematic test is applied,

will deter millions of lawfully present immigrants and U.S. citizens in immigrant families from seeking care and aid for which they qualify under federal law, increasing down-the-line costs. The American Public Health Association said as much in its 2019 statement opposing the Trump administration's public charge policy change, warning that "we can expect higher rates of obesity, malnutrition and poverty; lower rates of prescription adherence and education attainment; and increased health care costs as immigrants turn to emergency departments to treat preventable illness and chronic disease complications." Deterring eligible individuals from seeking the support they are due now inevitably paves the way for much higher economic and societal costs in the future.

Spring Institute is particularly troubled that the proposed rule would remove the regulations that provide "bright line" guidance to immigration officers on the law of public charge that only past receipt of cash assistance for income maintenance or long term institutionalization at government expense would be considered in the public charge assessment. The clarity in the current rule has allowed Spring Institute and fellow organizations promoting immigrant integration to confidently guide our clients in accessing the public benefits for which they or their children are eligible and that promote family wellbeing and economic mobility, such as nutrition education and assistance, breastfeeding support, health insurance, and early childhood education. Furthermore, without a clear prohibition on considering benefits used by family members, the rule will cause families to worry that the receipt of benefits by family members – including U.S. citizen children – will be held against them in a public charge assessment.

While failing to account for these egregiously detrimental impacts, The Department glaringly omits any justifiable case for why the current policy should be eliminated. We therefore strongly urge the Department to withdraw its current proposal and redirect efforts to advancing policies that strengthen—rather than undermine—the ability of immigrants to support themselves and their families in the future. Any other approach is an affront to the fundamental patriotic values and basic economic tenets that heretofore have shaped the U.S. into the most prosperous country in the world.

At a minimum, the Department should immediately clarify that any changes will not be retroactive. Since the 2022 regulations state that the only programs that may be considered in the public charge assessment are cash assistance for income maintenance or long term institutionalization at government expense, going forward, no other benefits should be considered if they were received while these regulations remain in effect.

Thank you for the opportunity to comment on this important matter.

Amanda Bent
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