



December 10, 2018

Ms. 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, D.C. 20529

Re. Docket No USCIS-2010-0012

Dear Ms. Deshommes:

The Nutrition Policy Institute, within the University of California's Division of Agriculture and Natural Resources, submits this comment in strong opposition to the US Department of Homeland Security's October 10, 2018, proposed rule with regard to immigrants' "public charge" determinations.

For nearly twenty years, the Nutrition Policy Institute (NPI) has engaged in research to improve nutrition policy in California and the nation, with special emphasis on the challenges for low-income communities and individuals in accessing a healthy diet. Taking a public-health approach, NPI focuses much of its work on children, for whom a disease-prevention approach is most effective. Seeking to improve nutrition and health for the largest number of low-income children, NPI studies often examine the federal food programs in light of their reach and impact. Because low-income children and their families are at the heart of so much that NPI does, NPI has deep interest in the predictably damaging consequences of the proposed rule to make participation in the Supplemental Nutrition Assistance Program (SNAP) a criterion in determinations to admit individuals to the United States and to become permanent residents.

Many of the thousands of comments submitted to date highlight the critical importance of SNAP for low-income individuals, for their nutrition and health, and for their growth, education, and the opportunity to live productive lives. While NPI agrees fully with those comments, the present comment uses a different lens, examining the extremely unfortunate consequences the proposed rule would cause for the broader community.

For example, in the State of California, more than \$6 billion each year goes directly into the state's economy from spent SNAP benefits. On top of this, an additional \$5 billion each year is generated by SNAP-related business transactions in the state, helping to support farmers, grocers, truckers, packers, and other businesses, helping them to be profitable and competitive. That means that SNAP benefits account for a total of \$11 billion annually in economic activity in California alone.¹ This revenue is critical to the economic viability of low income and rural communities and is generated in every state in the nation.

¹ Economic Impact: California Budget & Policy Center. CalFresh Reduces Hunger in Every Congressional District in California, but Could Face Deep Federal Cuts. <https://calbudgetcenter.org/resources/calfresh-reduces-hunger-every-congressional-district-california-face-deep-federal-cuts/>.



A University of California study demonstrates that SNAP, by helping families with food, contributes to keeping them healthy and thereby reducing healthcare costs. According to the study, SNAP participants in California incur \$1,400 less in healthcare costs per year than non-participants, saving taxpayers more than \$5 billion each year.² An additional study by UC researchers documents how SNAP participation during childhood is associated with improved health and productivity of adults.³ Adults who received SNAP benefits during childhood were likely to have better jobs as a result of improved nutrition and academic performance. Further these adults were more likely to have lower rates of obesity, diabetes, and high blood pressure, thus reducing healthcare costs. Still another recent study, authored by UCLA researchers, reveals that up to 17,700 jobs will be eliminated by the proposed changes to public charge.⁴ Thus SNAP benefits impact the whole community, with productive adults who can help build vibrant local economies, while incurring lower healthcare costs. With reductions in SNAP benefits going to those who need them, communities throughout the state will be impacted by job loss, causing thousands of families to become food insecure, with adverse nutrition and health consequences that undermine the state's economy.

A recent study conducted by researchers at NPI and UC Berkeley found that many adults living in the Fresno area of California in mixed-status families, composed of at least one undocumented parent born in Mexico and at least one US citizen child, felt threatened by immigration concerns.⁵ Even though the study was conducted before the proposed public-charge rule was issued, families already were reporting their concern that participation in SNAP and Medi-Cal might result in deportation, family separations, and rejection of applications for permanent resident status. Mere rumors and uncertainty about how participation in nutrition and health programs might disadvantage immigrant families convinced them not to apply for, or to drop out of, the federal assistance programs – to the state's as well as the families' detriment.

The fear factor – fear that in the future, present participation in SNAP, although satisfying current eligibility requirements, might have adverse immigration ramifications – was prevalent among those interviewed and a decisive basis of foregoing SNAP participation. For example, one mother of three spoke of the importance of SNAP to her family, particularly after she had stopped her job as a farmworker because she feared being picked up for deportation while traveling to and from the job or while at work: “... the stamps help our [her family's] economy, especially now that my husband is the only one bringing the money. It helps us have enough food for the kids.” Another mother was fearful to keep her citizen children enrolled in WIC even though she knew they were fully entitled to be: “But now since all this is coming up, I don't want even the WIC.”

² Berkowitz SA, Seligman HK, Rigdon J, Meigs JB, Basu S. Supplemental Nutrition Assistance Program (SNAP) Participation and Health Care Expenditures Among Low-Income Adults. *JAMA Intern Med.* 2017;177:1642-9

³ Hoynes H, Schanzenbach DW, Almond D. Long-Run Impacts of Childhood Access to the Safety Net. *Amer Econ Rev* 2016;106:903-34.

⁴ Ponce NA, Lucia L, Shimada T. Proposed Changes to Immigration Rules Could Cost California Jobs, Harm Public Health. Los Angeles, CA: UCLA Center for Health Policy Research, UC Berkeley Labor Center & California Food Policy Advocates. December 2018. <http://healthpolicy.ucla.edu/publications/Documents/PDF/2018/publiccharge-factsheet-dec2018.pdf>.

⁵ Rangel MI. Latino Health In the Trump Era: Government Health Care Utilization Among Mixed-Status Mexican Families. UC Berkeley School of Public Health Capstone Project. May 2018.



University of California
Agriculture and Natural Resources

In light of the severely harmful impact this proposed rule would have on many immigrants' nutrition and health and on our communities' economic vitality, NPI registers its strong opposition to the proposed rule.

Sincerely,

Lorrene D. Ritchie

Lorrene D. Ritchie, PhD, RD
Director and Cooperative Extension Specialist
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A handwritten signature in blue ink, appearing to read 'Ken Hecht', with a stylized flourish at the end.

Kenneth Hecht, JD
Director of Policy
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