



November 6, 2018

Samantha Deshommes
Office of Policy and Strategy
United States Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Ave NW
Washington, D.C 20529

Submitted via [regulations.gov](https://www.regulations.gov)

Re: Comments in Response to Inadmissibility on Public Charge Grounds

Upon learning of the details surrounding the changes to the "public charge" rule in our national immigration policy, the Kalamazoo Community Foundation felt called to stand in opposition to this harmful policy proposal that will impact our community. This proposed rule differs significantly from the long standing public charge rule as it directly impacts families who have received a broader range of public benefits and denies legal permanent residency pathways as well as other visa obtainment pathways for many immigrant communities nationwide who cannot meet the proposed level of scrutiny in this proposed policy. Families in our community would be left with making the onerous decision about the well-being of their family and their future legal standing in our country. Although the use of benefits by eligible children who are not applying for immigration status themselves would not be considered under this proposal, we expect that entire households will remain burdened by the proposed rule. There is no way to target individual immigrants with this type of proposed rule without hurting children, families, and entire communities, including our own.

Kalamazoo County is home to about 12,000 community members that identify as immigrant. According to county level data from the U.S. Census Opportunity Mapping Tool, children in Kalamazoo County who are born into immigrant mothers have an average income of \$37,000. There is significant potential that these children in our community will be deeply impacted by this policy due to the proposed minimum income level of \$62,000 for a family of four to be considered a low risk of becoming a "public charge." This will consequently deny immigrant adults in our community the liberty to pursue health, housing and nutrition benefits for themselves and their children, as well as the opportunity to seek permanent status in our country. Furthermore, one of Kalamazoo's core neighborhoods, The Edison Neighborhood, has the most



concentrated number of immigrants per square mile within the city of Kalamazoo at 5.4% of residents identifying as immigrant. Within this neighborhood, there are over 400 children who may be first or second-generation immigrant children (often U.S. citizens). Children in this neighborhood will likely be impacted by this policy as they experience increased concern and anxiety regarding the future standing of their parent's citizenship status in this country. If the proposed rule is not withdrawn, it will have direct impact on the health, nutrition, and housing needs of children, youth and adults in our broader Kalamazoo community. Ultimately, this will also impact the life trajectory of the immigrant families and children in our community.

The Kalamazoo Community Foundation recognizes the responsibility we have as a community to advocate against any proposal that causes fear and instability within our immigrant families who may need support to meet their most basic needs. As a grantmaking organization, our work stands to be impacted by this proposed rule as we deploy numerous resources into our community to minimize the harm that lack of access to food, healthcare, and other basic needs often has on marginalized populations. Within the last year, our community foundation deployed almost 1 million dollars in resources in these specific areas. Policies like the proposed rule will cause a ripple effect into the work of philanthropy, causing increased tensions in supply and demand on unrestricted dollars we have available to invest in our community. More importantly, we are a philanthropic institution driven by our values and mission and its proximity to the community we care deeply about. We understand the many ways in which this rule will result in negative consequences for our children, their education and their ability to reach their full potential in life. We support policies that ensure we are not creating further harm for the most vulnerable families in our community and respectfully request that the proposed rule be withdrawn. Our values as an organization and leadership role in philanthropy in Michigan require that we support policy efforts that allow our immigrant families to remain together and get the care, services and support they need to lead healthy and fulfilling lives in our community.

Sincerely,

A handwritten signature in black ink, appearing to read "CP", is positioned above the typed name of the signatory.

Carrie Pickett-Erway
President/CEO
Kalamazoo Community Foundation