SIGN ON LETTER FOR ANTI-HUNGER & NUTRITION STAKEHOLDERS ON PUBLIC CHARGE RESCISSION

Submitted via www.regulations.gov

December 19, 2025

Regulatory Coordination Division
Office of Policy and Strategy
Citizenship and Immigration Services
U.S. Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, Maryland 20746

Re: DHS Docket No. USCIS- 2025-0304, RIN 1615-AD06, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds

Dear Sir/Madam:

We write on behalf of the undersigned organizations to express strong opposition to the Department of Homeland Security's proposed Rule "Public Charge Ground of Inadmissibility" and ask that the Rule be withdrawn. Rescinding the 2022 public charge regulations through this deeply flawed proposal would dismantle decades of settled policy that appropriately limits public charge determinations to cash assistance for income maintenance and long-term institutionalization, and would replace that clarity with a broad, vague, and harmful framework.

Our organizations work across the country to reduce hunger and poverty, improve health and educational outcomes, and support the well-being of children, families, older adults, and people with low incomes. We include national and state advocates, direct service providers, health and nutrition experts, anti-hunger and immigrant rights organizations, and groups representing schools, health care providers, and community-based organizations.

We see every day how access to nutrition, health, and housing programs helps families stabilize their lives, participate in the workforce, and contribute to their communities.

For nearly two decades, U.S. immigration officials have explicitly reassured immigrant families that participation in programs such as the Supplemental Nutrition Assistance Program (SNAP), the Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Child Nutrition Programs (including school meals, CACFP, and the Summer Nutrition Programs), and other non-cash, means-tested benefits would not jeopardize their ability to become lawful permanent residents. Families, service providers, and state and local agencies have relied on this assurance. The proposed rule would reverse this longstanding interpretation of public charge by opening the door to treating non-cash benefits as negative factors, departing from a framework under which receipt of such benefits has never been the determining factor in a public charge finding.

This change would predictably chill participation among U.S. citizen and lawful permanent resident children and pregnant people, increasing the risk of food insecurity, unmet health needs, and unstable living conditions. The rule's broad discretion and lack of clear guardrails will fall hardest on immigrants who are people of color, children, older adults, people with limited English proficiency, and low- and moderate-income households.

The Department of Homeland Security (DHS) itself acknowledged that public benefits "play a significant role" in helping individuals work, attend school, and maintain their health.[1] When families can access these supports, communities experience stronger educational outcomes, improved health, and increased economic participation. Conversely, when families avoid needed assistance because of fear or confusion, the consequences reverberate across schools, hospitals, and local businesses.

DHS's 2018 analysis, based on a far narrower proposal, warned that disenrollment by eligible immigrants could result in worse health outcomes, increased emergency room use due to delayed care, greater spread of communicable diseases, higher uncompensated care costs, increased poverty and housing instability, and reduced productivity and educational attainment.[2] The harms would be significantly magnified under this proposed rule, which is both broader in scope and more ambiguous in its standards.

In the current Notice of Proposed Rule Making (NPRM), DHS estimates that at least 446,664 individuals, many of them children, would lose access to SNAP due to disenrollment [3] driven

[1] *Inadmissibility on Public Charge Grounds*. (2018, October 10). Federal Register. https://www.federalregister.gov/documents/2018/10/10/2018-21106/inadmissibility-on-public-charge-grounds
[2] *Inadmissibility on Public Charge Grounds*. (2018, October 10). Federal Register. https://www.federalregister.gov/documents/2018/10/10/2018-21106/inadmissibility-on-public-charge-grounds
[3] *Public Charge Ground of Inadmissibility*. (2025, November 19). Federal Register. https://www.federalregister.gov/documents/2025/11/19/2025-20278/public-charge-ground-of-inadmissibility#page-52214

by fear and misunderstanding. This is almost certainly a conservative estimate, given the proposal's broad and undefined reach. The rule also provides no meaningful analysis of its impact on WIC, school meals, and other child nutrition programs, despite strong evidence from prior public charge policies that families withdraw from programs not even included in the test when they fear immigration consequences.

The benefits of federal nutrition programs are well established. Research shows that SNAP improves food security, dietary quality, and health outcomes, and reduces poverty more effectively than any other program for non-elderly households.[4] Early access to SNAP increases educational attainment, earnings, and long-term economic stability.[5] SNAP participation also improves academic performance, moderates the effects of material hardship, and reduces childhood food insecurity. Studies consistently find that SNAP buffers against obesity among food-insecure adults and lowers the risk of overweight among children participating in nutrition programs.[6]

WIC, meanwhile, has become the nation's premier preventive public health nutrition program, supporting pregnant and postpartum individuals, infants, and children up to the age of five who have or are at risk for developing nutrition-related diseases and disorders. Poor nutrition, especially during the critical first five years of a child's life, can negatively impact overall child health and development and hinder adult achievement and productivity.[7] Research has shown that WIC improves health outcomes, supports learning and development, protects against obesity, reduces healthcare and other costs, and supports economic mobility. [8]

Changes to the public charge rule also could significantly reduce participation in free and reduced-price school meals, creating both educational and financial consequences for schools. Fear or confusion about whether school meal benefits count against immigration status would lead many eligible immigrant families to avoid applying. Lower participation in

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[4] *Hunger and Health - The Role of the Supplemental Nutrition Assistance Program (SNAP) in Improving Health and Well-Being - Food Research & Action Center*. (2017). Food Research & Action Center. https://frac.org/research/resource-library/snap-public-health-role-supplemental-nutrition-assistance-program-improving-health-well%e2%80%90being-americans

[5] *Hunger and Health - The Role of the Supplemental Nutrition Assistance Program (SNAP) in Improving Health and Well-Being - Food Research & Action Center*. (2017). Food Research & Action Center. https://frac.org/research/resource-library/snap-public-health-role-supplemental-nutrition-assistance-program-improving-health-well%e2%80%90being-americans

[6] *Hunger and Health - The Role of the Supplemental Nutrition Assistance Program (SNAP) in Improving Health and Well-Being - Food Research & Action Center*. (2017). Food Research & Action Center. https://frac.org/research/resource-library/snap-public-health-role-supplemental-nutrition-assistance-program-improving-health-well%e2%80%90being-americans

[7] Colman, S., Nichols-Barrer, I. P., Redline, J. E., Devaney, B. L., Ansell, S. V., & Joyce, T. (2012). Effects of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): A Review of Recent Research. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis.

[8] *WIC IS A CRITICAL ECONOMIC, NUTRITION, AND HEALTH SUPPORT FOR CHILDREN AND FAMILIES* [Review of *WIC IS A CRITICAL ECONOMIC, NUTRITION, AND HEALTH SUPPORT FOR CHILDREN AND FAMILIES*]. FRAC. https://frac.org/wp-content/uploads/frac_brief_wic_critical_economic_nutrition_health_support.pdf

school meals would reduce federal reimbursements and erode economies of scale. Additionally, fewer eligible children participating in SNAP and Medicaid would mean less children directly certified for free school meals, which could shrink the number of schools able to utilize the Community Eligibility Provision.

The rule would also impose substantial costs on state and local governments. When federal policy drives eligible families to withdraw from SNAP, WIC, School Meals, Medicaid, or other essential programs, the need for food, housing, and health care does not disappear. Instead, the financial responsibility shifts to state, county, and municipal governments, which must fill gaps previously covered by federal funds. This dynamic creates an unsustainable burden on state and local budgets and diverts resources from other critical services. The aftermath of the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), which eliminated SNAP eligibility for many legal immigrants, illustrates this clearly: several states used state dollars to provide limited food assistance, but these stop-gap measures were neither comprehensive nor sustainable.[9][10] The proposed rule would force states and localities to confront similar, and far larger, costs today, compounded by harms to health, food security, education, and family well-being resulting from the loss of benefits.

The economic harm extends beyond governments to businesses and local economies. DHS itself notes in the NPRM that "a reduction in payments to these households could have a negative impact on the economy by their reduced spending." [11] USDA has estimated that SNAP benefits generate significantly more in economic activity than the federal dollars invested.[12] These economic harms will be compounded by the reconciliation law's restrictions, which reduce the number of people eligible for SNAP and therefore amplify the spending reductions created by the proposed rule.[13] When participation in nutrition programs falls because of fear, grocery retailers, farmers, food manufacturers, transportation companies, and other businesses lose revenue, and communities lose jobs and economic vitality.[14]

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[9] *PRWORA's Immigrant Provisions*. (2025). Ct.gov. https://www.cga.ct.gov/2007/rpt/2007-R-0705.htm?

[10] Fix, M., & Zimmermann, W. (1998, August). *The Legacies of Welfare Reform's Immigrant Restrictions* [Review of *The Legacies of Welfare Reform's Immigrant Restrictions*]. https://migration.ucdavis.edu/cf/more.php?id=120

[11] "Public Charge Ground of Inadmissibility." *Federal Register*, 19 Nov. 2025,www.federalregister.gov/documents/2025/11/19/2025-20278/public-charge-ground-of-inadmissibility#page-52214.

[12] Canning, Patrick, and Brian Stacy. *The Supplemental Nutrition Assistance Program (SNAP) and the Economy: New Estimates of the SNAP Multiplier United States Department of Agriculture*. 2019.

[13] *Congressional Budget Office Supplemental Information*. 2025., Estimated Effects of Public Law 119-21 on Participation and Benefits Under the Supplemental Nutrition Assistance Program

[14] Johnson, Stephanie. "The "One Big Beautiful Bill Act": How Major SNAP Reforms Will Reshape the Independent Grocery Industry - National Grocers Association." *National Grocers Association*, 18 July 2025, www.nationalgrocers.org/news/the-one-big-beautiful-bill-act-how-major-snap-reforms-will-reshape-the-independent-grocery-industry/.

In conclusion, the proposed public charge rule would reverse decades of progress in reducing hunger and poverty and would lead to a hungrier, sicker, and poorer nation. By deterring individuals and families from accessing vital programs, it would increase food insecurity and hardship, worsen health outcomes, widen racial and economic disparities, and strain state and local budgets and economies.

For these reasons, the undersigned organizations respectfully urge DHS to withdraw the proposed rule and instead advance policies that strengthen, rather than undermine, the ability of U.S. citizens and immigrants to support themselves, care for their families, and contribute to their communities.

Sincerely,

A+ Schools
American Friends Service Committee - WV
Anne Arundel County Food Bank, Inc.
Arlington EATS
Association of State Public Health Nutritionists
Autistic Self Advocacy Network
Catholic Charities of Fairfield County, Inc
Center for Ecoliteracy
Church Women United in New York State
Coalition for a Healthy Greater Worcester
Coalition on Human Needs
Community Action Partnership of Orange County
Community Harvest Project
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Cooperative Baptist Fellowship (CBF)
Dave Cassaro Consulting
DC Hunger Solutions
Division for Early Childhood of the Council for Exceptional Children
East Boston Social Centers
ESTHER GROUP FAMILY DAYCARE INC
Family Health Council of Central PA, Inc.
Farm and Food Justice Network
Food Research & Action Center
Greater Wisconsin Agency on Aging Resources, Inc.
Healthy Food America
HIAS Pennsylvania
Houston Food Bank
Hunger Free Colorado
Illinois Public Health Association

Institute for Child Success
Jeremiah's Inn
Jericho Road Community Health Center
Johnson Food Shelf
Justice & Advocacy Coalition of Montgomery County (MD)
Kent County Essential Needs Task Force
Little Gem Family Daycare
Local Initiatives Support Corporation (LISC)
Lori's Daycare
Los Angeles Regional Food Bank
Lowcountry Food Bank Inc
Lutheran Social Services of the Southwest
Manna Food Center
Maryland Hunger Solutions
Massachusetts Law Reform Institute
Missoula Food Bank & Community Center
Montgomery County Food Council
National Advocacy Center of the Sisters of the Good Shepherd
National CACFP Forum
National Council of Jewish Women
National Education Association
Nebraska Appleseed
Nourish California
Nourish Colorado
Oregon School-Based Health Alliance
Our Lady Queen of Peace
Pittsburgh Food Policy Council
Poetry X Hunger
Providers Network Inc
QueenBeeBooks
Refugee & Immigrant Assistance Center
Rogan's List
Rooted In Inc.
Sisters of St. Joseph Healthcare Foundation
Sparks UMC Food Pantry
Spoonfuls
The Center for Wellbeing-Centro Bienestar, Inc.
The Food Group
The Hope Center for Student Basic Needs
The Mane Attraction
Vermont Environmental Justice Network
Vermont Foodbank

Washington State Association of Head Start
Washington State Parent Ambassadors
Westside Food Bank
Wisconsin Education Association Council
Yes We Care, Inc.
Zeina Lorraine Inc