

April 25, 2022

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

**U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW  
Washington, DC 20529-2140**

*Re: DHS- Docket No. USCIS-2021-0013; Comments in Response to Proposed Rulemaking,  
Public Charge Ground of Inadmissibility*

We write on behalf of the UnidosUS Affiliate Council in response to the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking (NPRM), published on February 24, 2022. The Affiliate Council serves as a voice for, and represents the partnership between, UnidosUS, the nation's largest Hispanic civil rights and advocacy organization, and our most important constituency – our nearly 300 Affiliates that serve Latino communities nationally. We provide guidance to UnidosUS on its programs and policy, and on strengthening regional networks and promoting the work of Affiliates.

Since the Biden-Harris administration came into office, DHS has taken proactive measures to address the long-problematic public charge rule. We thank you for and applaud the latest proposed rulemaking for the public charge ground of inadmissibility. If implemented effectively, this policy will help Latinos and immigrants surmount the “chilling effects” that previously made them reticent to access critical social safety net programs and other public resources. As our nation strives to come out of the COVID-19 pandemic unified, we urge DHS to quickly finalize this latest public charge rule in an effort to provide much needed clarity and reassurance to immigrants, mixed-status families, and their communities.

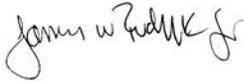
The UnidosUS Affiliate Council endorses and incorporates by reference the joint comments submitted by UnidosUS and the Protecting Immigrant Families (PIF) campaign into our own. Within these comments, we would like to draw special attention to the following insights that we believe will ensure an equitable recovery for our communities:

- **Build community trust to reduce chilling impacts.** We welcome the invitation to provide advice on how to “communicate with parents of U.S. citizen children that the receipt of benefits by such children would not be considered part of the public charge inadmissibility determination for the parents.” Namely, we recommend the inclusion of a non-exclusive list of exempted benefits that we regularly hear confusion about directly within the text of the regulation.
- **Exclude programs funded completely by state, local, tribal, and territorial governments.** As we have seen during the pandemic, states and locality often fill the important gaps in the social safety net where the federal government falls short; thus, their inclusion in the public charge determination could frustrate these important state and local interests.

- **Do not consider Medicaid, even for institutional long-term care, in a public charge determination.** Its inclusion is likely to confuse people and lead them to forgo health care.

We thank you for your prioritization of this policy. The UnidosUS Affiliate Council urges DHS, for the sake of our communities, to quickly issue a final rule including the above referenced recommendations.

On Behalf of the UnidosUS Affiliate Council,



James Rudyk, Executive Director, Northwest Center  
Chair of the UnidosUS Affiliate Council

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