



ERIC GARCETTI
MAYOR

October 11, 2018
Samantha Deshommes
Chief, Regulatory Coordination Division
Department of Homeland Security
USCIS, Office of Policy and Strategy
20 Massachusetts Avenue NW
Washington, DC 20529-2140

Re: Request for Public Comment on Proposed Regulation: “Inadmissibility on Public Charge Grounds” – DHS Docket No. USCIS-2010-0012

Dear Ms. Samantha Deshommes,

On behalf of the City of Los Angeles, I respectfully submit these comments in response to your Proposed Regulation: “Inadmissibility on Public Charge Grounds.”

I am proud to represent a city where everyone is welcome, regardless of where they were born or how much money they make – and I believe our country is strongest when we keep the doors of opportunity open for all. Unfortunately, this new rule will shut those doors on millions of families, in my hometown and across our country, all because they needed a little extra help to afford a meal for their kids, a visit to the doctor, or a roof over their heads.

For the nearly 1.5 million immigrants who call Los Angeles home, some newly arrived and others who have lived here for decades, the proposed change would strip them of their fundamental economic rights. It would force too many families to forgo basic necessities if they wish to remain together. It would punish American-born children and penalize immigrants who work hard, pay taxes, and play by the rules.

This anti-family measure is simply wrong, and I strongly urge your department to reject it.

As written, the expanded regulation would represent a significant departure from longstanding practices that have been in place for nearly 20 years. It would not only increase the number of immigrants denied entry/green cards because of the likelihood that they would become dependent on government benefits, but it would also dissuade our nation’s most vulnerable individuals and

families from seeking assistance for fear of denial of permanent residency and a path to citizenship. This regulatory change particularly threatens the public health and wellbeing of our immigrant communities in my city. Today, Medicaid and CHIP help provide lawfully present immigrants access to needed care and protections from high medical costs that support their ability to work and the growth and healthy development of their children, many of whom are United States citizens.

According to a recent analysis, the proposed changes would likely lead to decreased participation in Medicaid, CHIP, marketplace coverage, and other programs among immigrant families, including their citizen children. This will put the lives of vulnerable Angelenos at risk, negatively affect their health and financial stability, and increase uninsured rates throughout our community.

According to projections based on Los Angeles County enrollment data, the economic impact to our region due to populations withdrawing from benefits would be severe. Just over 1 million immigrant individuals in Los Angeles county currently receive TANF, MediCal, SNAP, and Section 8 benefits. The estimated annual cost to our local economy if 25% of immigrant households in LA County forgo benefits would be \$54,020,736 for SNAP (CalFresh) and \$8,458,560 TANF (CalWORKs). 8,050 immigrants receive Section 8 benefits in the City of Los Angeles. If every single American were to take this eligibility exam, 100 million Americans -- one third of the population -- would fail.

It is critical that changes to our nation's rules and regulations protect families from becoming susceptible to adverse health risks and financial instability. I strongly oppose this policy and encourage you to turn back this change to the classification of inadmissibility on public charge grounds.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Garcetti". The signature is stylized and includes a horizontal line extending to the right.

ERIC GARCETTI
Mayor