



December 19, 2025

Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

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

Dear Secretary Noem,

The Federation of Protestant Welfare Agencies (FPWA) submits these comments in strong opposition to the Department of Homeland Security's proposed Rule "Public Charge Ground of Inadmissibility." The proposed rule will harm local economies and businesses that benefit from the infusion of spending from safety net programs and the economic activity these programs generate, while also creating substantial confusion and fear among immigrant families and deter them from participating in critical support programs that have wide social and economic benefits.

FPWA is a leading anti-poverty, social policy and advocacy organization dedicated to strengthening faith institutions and human services organizations and advancing economic opportunity and justice for New Yorkers with low incomes. For more than 100 years, FPWA has driven groundbreaking policy reforms to better serve those in need and strengthened the capacity of human services agencies and faith institutions to serve the community. Our nearly 170 faith-based and human services agency members provide vital services to their communities ranging from child care and early education to services for older adults and food pantries. We appreciate the opportunity to comment on the proposed rule.

As the founder and co-chair of the National True Cost of Living Coalition, FPWA commissioned the Urban Institute to develop a first-in-the-nation True Cost of Economic Security (TCES) measure.¹² This research revealed that across the nation, 52 percent of people—and 54 percent of New Yorkers³—are economically

¹ Acs, G., Dehry, I., Giannarelli, L. & Todd, M. (2024). *Measuring the True Cost of Economic Security*. Urban Institute. <https://www.urban.org/sites/default/files/2024-11/Measuring-the-True-Cost-of-Economic-Security.pdf>

² Using county-level data, the TCES offers a robust look at the costs families face today, measuring average costs for food, clothing, housing, health care, child care, transportation, post-secondary education, debt service, and additional miscellaneous costs. In addition, the measure calculates the resources that individuals and families have to meet these costs, including labor earnings and self-employment income, some types of passive investment income, pensions and retirement income, government social insurance and public assistance programs like Social Security, Medicare, Medicaid, and the Supplemental Nutrition Assistance Program (SNAP), as well as employer-provided healthcare contributions. Unique to this measure, the TCES includes a 10 percent savings threshold in the costs criteria that allows households to cover unexpected expenses and plan for the future.

³ Unpublished Urban Institute TCES data, held at FPWA.

insecure, meaning they do not have the resources necessary to meet this comprehensive set of regular household costs, set aside savings both for future planning and for short-term emergencies, and manage debt. More, economic mobility has declined⁴ and wages have stagnated,⁵ leaving economic security out of reach for most New Yorkers.

While we build toward a New York in which everyone lives with economic security, we advocate in particular for a variety of policies to support the needs of New Yorkers with low and extremely low incomes. This includes but is not limited to ensuring an equitable system of income supports, such as the Temporary Assistance for Needy Families (TANF) block grant, the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and health insurance programs like Medicaid.

Research shows that income support programs not only yield significant positive impacts on adults, children, and communities, but they also yield significant economic benefits and cost-savings to federal, state, and local governments. For example, studies show that SNAP reduces poverty⁶ and food insecurity⁷ and enhances educational advancement, especially among children.⁸ But SNAP also has been shown to yield macroeconomic benefits: USDA estimates that every \$5 in SNAP benefits generates \$9 in economic activity.⁹ Similarly, WIC reduces household food insecurity in recipient households with children under 5 years old by at least 20 percent¹⁰ and WIC enrollment and utilization during pregnancy are associated with improved birth outcomes, including lower risk of preterm birth, low birth weight, and perinatal death.¹¹ Further, every \$1 in prenatal WIC services saves about \$2.48 in medical, educational, and productivity costs over a newborn's lifetime.¹² These programs also effectively respond to economic downturns, swiftly injecting spending into local economies and supporting businesses during periods of financial stress while providing immediate relief to families facing financial hardship.

⁴ Isaacs, J. B. *International Comparisons of Economic Mobility*. (2016). The Brookings Institution.

https://www.brookings.edu/wp-content/uploads/2016/07/02_economic_mobility_sawhill_ch3.pdf

⁵ Mishel, L., Gould, E., & Bivens, J. (2015). *Wage Stagnation in Nine Charts*. Economic Policy Institute.

<https://www.epi.org/publication/charting-wage-stagnation/>

⁶ Tiehen, L., Jolliffe, D., & Smeeding, T. M. (2015). SNAP Matters: How Food Stamps Affect Health and Well-Being University of Wisconsin-Madison Institute for Research on Poverty (IRP). <https://www.irp.wisc.edu/resource/the-effect-of-snap-on-poverty/>

⁷ Li, Y., Mills, B., Davis, G. C., & Mykerezi, E. (2014). Child food insecurity and the Food Stamp Program: what a difference monthly data make. *Social Service Review*, 88(2), 322–348.

https://uknowledge.uky.edu/ukcpr_papers/29

⁸ Beharie, N., Mercado, M., & McKay, M. (2017). A Protective Association between SNAP Participation and Educational Outcomes Among Children of Economically Strained Households. *Journal of hunger & environmental nutrition*, 12(2), 181–192. <https://doi.org/10.1080/19320248.2016.1227754>

⁹ Canning, P. & Stacy, B. (2019). *The Supplemental Nutrition Assistance Program (SNAP) and the Economy: New Estimates of the SNAP Multiplier*. United States Department of Agriculture.

https://ers.usda.gov/sites/default/files/_laserfiche/publications/93529/ERR-265.pdf?v=70863

¹⁰ Kreider, B., Pepper, J. V., & Roy, M. (2016). Identifying the effects of WIC on food insecurity among infants and children. *Southern Economic Journal*, 82(4), 1106–1122. <https://doi.org/10.1002/soej.12078>

¹¹ Fingar, K. R., Lob, S. H., Dove, M. S., Gradziel, P., & Curtis, M. P. (2017). Reassessing the Association between WIC and Birth Outcomes Using a Fetuses-at-Risk Approach. *Maternal and child health journal*, 21(4), 825–835.

<https://doi.org/10.1007/s10995-016-2176-9>

¹² Nianogo, R. A., Wang, M. C., Basurto-Davila, R., Nobari, T. Z., Prelip, M., Arah, O. A., & Whaley, S. E. (2019). Economic evaluation of California prenatal participation in the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) to prevent preterm birth. *Preventive medicine*, 124, 42–49.

<https://doi.org/10.1016/j.ypmed.2019.04.011>

For individuals and families earning low wages and those currently left out of the labor market, safety net programs provide essential resources. They support individuals and families in meeting their day-to-day needs and caring for themselves and their children. They also help individuals and families manage challenging circumstances in their lives, whether it be caring for aging adults or children with disabilities, experiencing domestic violence, or navigating their own illnesses, injuries, or disabilities. Research shows that four out of five Americans will experience at least one year of significant financial instability or rely on public assistance during their working years.¹³ Over a lifetime, about 70 percent of Americans will need to turn to the safety net at some point.¹⁴ Thus, public benefits are not a niche resource for a small minority but rather are critical supports that reach the vast majority of individuals and families, especially when they face unexpected financial hardships.

The Department of Homeland Security (DHS) has acknowledged that public benefits “play a significant role” in helping individuals work, attend school, and maintain their health.¹⁵ DHS’s own 2018 analysis, based on a far narrower proposal, warned that disenrollment from public benefits by eligible immigrants could result in worse health outcomes, greater use of emergency rooms due to delayed medical care, higher uncompensated care costs, increased spread of communicable diseases, higher rates of poverty and housing instability, and reduced productivity and educational attainment.¹⁶ These harms would be significantly magnified under the current proposal, which is far more expansive. DHS now estimates that at least 446,664 individuals, many of them children, would lose access to SNAP due to disenrollment¹⁷—which is likely an underestimation given the proposal’s broad and undefined scope. The rule also does not provide an analysis of the effects on programs such as WIC or School Meals. Participating in the Child Nutrition Programs has never been a factor in public charge considerations; however, it is very likely that families who are eligible will refuse to participate in these vital nutrition programs due to fear of public charge determinations.

If the proposed rule were to be adopted, families across New York and the nation—whether citizens, lawful permanent residents, or immigrants with lawful status—would face challenges understanding whether accessing benefits might jeopardize their own immigration status or that of a loved one. Not only this, but the government agencies, social service providers, and community organizations that administer and/or assist individuals in applying for safety net programs would lack clear guidance on how to interpret the rule and/or how to advise the individuals and families they serve. This would further strain the already overextended networks of providers and community organizations.

For nearly two decades, U.S. immigration officials have explicitly reassured immigrant families that participation in programs like SNAP, WIC, the Child Nutrition Programs, and other means-tested, non-cash benefits would not affect their ability to become lawful permanent residents. But the proposed rule

¹³ Rank, M. R., Hirschl, T. A., & Foster, K. A. (2014). *Chasing the American Dream: Understanding What Shapes Our Fortunes*. Oxford University Press.

¹⁴ Council of Economic Advisers, Economic Report of the President (2014). Executive Office of the President. http://www.whitehouse.gov/sites/default/files/docs/full_2014_economic_report_of_the_president.pdf

¹⁵ *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>

¹⁶ *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>

¹⁷ *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>

removes the explicit limits in current regulations regarding which benefits may be considered,¹⁸ suggesting that *any* means-tested benefit, received or applied for at any time and in any amount, even when used by U.S. citizen or lawful permanent resident family members, could be treated as negative evidence in immigration determinations. Not only this, but the proposed rule uses vague terms such as “public resources” and does not define “means-tested public benefits.” It also expands scrutiny to benefits used by family members by removing the explicit protection that receipt of benefits on behalf of others does not count against the applicant. Thus, the proposed rule would create a sweeping “chilling effect” and prompt U.S. citizens, lawful permanent residents, and immigrants to go without or withdraw from these benefits.

The evidence is clear: federal nutrition programs promote well-being and economic mobility. A rule that deters families from accessing these benefits would inflict lasting harm on families and communities in New York and across the U.S. Beyond this, it would also weaken our economy and shift billions in federal responsibilities onto already strained state and local budgets. We thus urge the Department of Homeland Security to withdraw the proposed public charge rule and pursue policies that instead strength the ability of U.S. citizens and immigrants to support themselves, care for their families, and contribute to their communities.

Sincerely,

Madeline Neighly
Chief of Policy & Research

¹⁸ *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>