



October 22, 2021

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

Submitted via www.regulations.gov

Re: DHS- Docket No. USCIS-2021-0013; Comments on Public Charge Ground of Inadmissibility

We respectfully submit the comments below in response to the Department of Homeland Security's (DHS) Advance Notice of Proposed Rulemaking (ANPRM), published on August 23, 2021.

UnidosUS, previously known as the National Council of La Raza, is the nation's largest Hispanic civil rights and advocacy organization. Through its unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges the social, economic, and political barriers to the success and well-being of Latinos at the national and local levels. For more than 50 years, UnidosUS has united communities and different groups seeking common ground through collaboration, and that share a desire to make our country stronger.

We appreciate the priority that DHS is giving to addressing the long-problematic public charge rule. As UnidosUS is documenting, hardworking immigrants and Latinos¹ have served on the front lines of the pandemic as essential workers, making untold sacrifices, and suffering disproportionately from the virus.² And, as the country is poised to turn the corner, immigrants—including Latinos—are playing a critical role in the recovery of our nation.

Yet the public charge test of inadmissibility—and its well-demonstrated chilling effects—are a barrier to full participation in the economy and community for many, including many Latinos. We note, specifically, that such a rule and policy disproportionately impacts Latinos, because Latinos are more likely to be part of a mixed-status household,³ and are more likely to work in lower-wage jobs essential to our economy.⁴

Latino and immigrant labor and contributions are driving the economic recovery, and they are engines of economic dynamism and growth over the long-term. It is therefore essential that they do not face undue burdens on their fullest possible participation in the life of our nation, and that the "public charge" rule, specifically, be restored to its appropriate legal parameters as a narrow statutory limitation on entrants to the country or those seeking adjustment of status. Moreover, and critically, the evidence

is clear that children with ready access to major safety net programs have better birth outcomes, overall health, and improved self-sufficiency as an adult who can make both higher earnings and higher tax contributions.⁵

History also shows us, as described below, that the barrier to accessing public benefits for children in mixed-status household created by the public charge test has been deployed as—and is inherently and statutorily—an artifact of structural racism, wherein the immigration status of the individual and members of their household is translated into stigma and negatively impacts health, even becoming a social determinant of health.⁶ For all of these reasons, addressing and taking steps to limit the negative consequences of the public charge test for inadmissibility evaluations is an essential step toward achieving a more equitable future for all.

Below, we first provide a general orientation on the implications of the public charge rule and its history, then turn to address specific questions raised by the ANPRM. In addition to these comments, UnidosUS is delighted to fully endorse the joint comments submitted by the Protecting Immigrant Families (PIF) campaign and hereby fully incorporate them into our comments.

Summary: The public charge rule imposes needless hardships on the Latino community and immigrants generally

Under current law, immigrants seeking legal permanent residence must show that they are not likely to become a “public charge,” which should be carefully defined as those likely to become permanently and primarily dependent on government benefits (as explained in the comments from PIF and related groups). As noted in a *Health Affairs* article published earlier this year, “[r]esearch suggests that confusion and fear associated with being a public charge has deterred immigrants from participating in safety-net programs.”⁷ Because of limited the eligibility for public benefits for noncitizens who may face a public charge test, the majority of the people impacted by the chilling effect are *eligible* for public benefits and largely *exempt* from a public charge test of inadmissibility, such as U.S. citizen children with noncitizen parents, naturalized citizens, and legal permanent residents.

The deleterious efforts of the public charge rule, including on the Latino community, considerably worsened in 2017, when a draft proposal was developed by the Trump administration to also include public benefits related to, for example, food and health, such as the Supplemental Nutrition Assistance Program (SNAP) and Medicaid, which provides health insurance coverage.⁸

Although the public charge rule was withdrawn in March 2021 under the Biden administration, the draft proposal, and the public perception and misperceptions it occasioned, demonstrably decreased immigrants’ enrollment in public programs,⁹ as explored further below. As the 2021 *Health Affairs* article described, the effects and harm from the proposal and resulting stigmatization of range of benefits was both wide and deep: “[n]ational surveys show that even legal permanent residents, naturalized citizens, and US-born citizen children and spouses are forgoing benefits, including programs not named in the proposed changes to the rule, as a result of widespread confusion and fear.”¹⁰

The history of the public charge provision is deeply problematic and results in underuse of critical benefits and supports that should be widely available

Throughout its history, the “public charge” statute has been a manipulable test used by those with a discriminatory enforcement agenda to prevent migration of Latinos or other groups not in favor at the

time of its deployment. In sum, the history of the policy—and its known effects—shows that it is a tool primarily used to limit migration or threaten access to services and well-being for communities and individuals based on their race, ethnicity, country of origin, religion, gender, disability, and any other characteristic perceived as problematic.¹¹

Notably, the practical importance of the public charge test for *deportation purposes* has been, for more than half a century, essentially nil. Prior to the 1950s, deportations based on allegations that a person had become a “public charge” were frequent, often targeting marginalized groups, such as Mexican Americans.¹² Then, in 1948, a decision by the Board of Immigration severely limited the circumstances under which a noncitizen could be deported as a public charge. Under this decision, to deport someone as a public charge the government had to show that: (1) The state or other governing agency imposed a charge for the services rendered to the immigrant; (2) the authorities demanded payment of the charges; and (3) the immigrant failed to pay the charges.¹³ The Immigrant Resource Center, in a report on public charge, claimed that they were unable to locate any federal or state public benefits that require the recipient to pay a fee or repay the government for a benefit.¹⁴ Consequently, the first step of the test is seldom attained. After this decision, deportations based on public charge largely ceased: by the 1980’s fewer than 1% of deportations were of the result of a public charge determination.¹⁵

Although its use as a ground to initiate deportations has all but ended, the vagueness of the public charge statute continues to be used in ways that reflect structural racism and discrimination in immigration enforcement. This is largely because public charge determinations are part of immigrant visa and adjustment of status applications for those seeking lawful admission into the United States. According to the preamble of the 1999 Interim Field Guidance, a definition of public charge was greatly needed due to “growing confusion” among noncitizens after the passage of Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) and the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) in 1996 about “which benefits [noncitizens] may safely access without risking deportation or inadmissibility.”¹⁶

However, confusion about the definition of public charge was not just because of the welfare reform laws. The 1999 Interim Field Guidance was also an apparent effort to address serious public concerns about the so-called “Lookout Systems” then being used by the Immigration and Naturalization Services (INS) and Department of State (DOS).¹⁷ Under those “Systems,” the INS and DOS were misapplying the statute: illegally denying green cards to applicants solely based on the past or current receipt of public benefits, including Medicaid and nutritional supports, and were identifying noncitizens who had *legally* received Medicaid benefits and denying them entry until those benefits were repaid in full.¹⁸ This created a public health crisis among noncitizen families, most of whom were Latino. Many disenrolled themselves and their children from public benefits and were reportedly too frightened to seek even needed medical care for fear that health institutions would report them to immigration authorities.¹⁹

To end these deeply problematic misuses of the law and provide more clarity regarding how the public charge statute should be applied after PRWORA, the INS authored the 1999 Field Guidance, which remained the agency policy until it was replaced by the 2019 Public Charge rule by the USCIS under the Trump administration.

During the years following welfare reform and the troubling practices of the “Lookout Systems,” lawful immigrants’ use of major public benefits declined substantially. Importantly, such declines were not entirely or primarily attributable to a change in eligibility.²⁰ Noncitizens already in the United States

remained eligible for most of federal programs because the PRWORA impacted only those immigrants arriving after 1996, when it first became law. Regardless, research shows that lawful permanent residents disenrolled from many public programs out of fear, even though they remained technically eligible.²¹ From 1994 to 1999, immigrant use of a range of public benefits decreased. Specifically, use by immigrants of Temporary Assistance for Needy Families (TANF) declined 60%; food stamps declined 48%; Supplemental Security Income (SSI) declined 32%; and Medicaid declined 15%.

The chilling effect also impacted groups of people who were technically protected by the law. By 1999, benefit use rates among U.S. citizen children in lower-income families with at least one noncitizen parent were substantially lower than for citizen children of U.S.-born parents in lower-income families.²²

To illustrate the pervasiveness of the chilling effect and the confusion in communities INS officials were confronting at the time of the 1999 guidance, one need only look at the experience of refugees, a special humanitarian status provided to noncitizens entering the United States because they were persecuted or fear persecution.²³ Even though PRWORA maintained refugee eligibility for federal benefit programs, and that refugees are, as a group, exempt from the application of the public charge test, take up among those communities subsequently plummeted. For lower-income refugees, the use of public benefits declined precipitously: by 78% for TANF; 53% for food stamps; and 36% for Medicaid.²⁴ Such declines, when coupled with similar dips being experienced among other eligible immigrants and U.S. citizens in mixed-immigration status household, clearly demonstrate that the law's damage considerably exceeds its legal scope.

Despite more than a decade worth of work after the issuance of the 1999 INS guidance by organizations like UnidosUS, and others with deep ties to Latino and immigrant communities across the country, to combat confusion and distrust surrounding the scope and application of the public charge test, this damaging history resurfaced as a result of efforts by the Trump administration to significantly expand the reach and application of the public charge test. Research confirms that the lead up to and the rollout of the 2019 public charge rule by the Trump administration created a new wave of panic with mixed-status families disenrolling from public benefits out of fear of negative immigration consequences.

Among low-income immigrant households with children, nearly one in three reported avoiding a public benefits program in 2019 for fear of risking future green card status. Most of these households would not have been directly impacted by the new rule because the majority of the children are U.S. citizens and the 2019 public charge rule did not consider a child's benefit use in a parent's public charge determination.²⁵ The Migration Policy Institute found that between 2016 and 2019 participation in TANF, SNAP, and Medicaid declined far more rapidly for noncitizens than U.S. citizens. In addition, the share of children receiving benefits under TANF, SNAP, and Medicaid fell about twice as fast among U.S. citizen children with noncitizen household members as it did among children with only U.S. citizens in their household.²⁶

Public benefits provide much needed support for essential workers and their families, noncitizens should have equal Access to this support

Overall, history is clear that the public charge rule has been used as a tool, in 2019 and prior, to limit access to public benefits for noncitizens. Despite the obvious need for public benefits to supplement essential low-wage work, racist rhetoric that portray immigrants as "takers" continues to motivate limitations on access for minority workers and their families.²⁷ As an example, the preamble to the

proposed 2019 public charge rule stated that noncitizens should be “self-sufficient, [and should] not depend on public resources to meet their needs, but rather rely on their own capabilities.” We urge our government to acknowledge this problematic history, and to discontinue the use of thinly veiled alternative justifications that only serve to obfuscate its truly racialized origins.

This assertion fails to acknowledge the level at which all lower-wage workers—citizen and noncitizen—rely on public benefits to supplement their incomes, and the (often temporary) nature of these supports as individuals grapple with economic shifts, health-related disruptions, and other common and widespread experiences, including a pandemic. A 2019 analysis from the Center on Budget and Policy Priorities found that if the 2019 public charge rule applied to U.S.-born citizens, nearly half would likely be deemed inadmissible if held to same standard.²⁸ Our communities and economy depend on the labor of people who are both immigrants and native-born U.S. citizens—many of whom often receive modest pay and few benefits for their essential work.

Moreover, the overbreadth of the effect is well demonstrated. The ANPRM requests comment how the DHS should address the possibility that individuals who are eligible for public benefits, including the U.S. citizen relatives of noncitizens, would “forgo the receipt of those benefits as a result of DHS's consideration of certain public benefits in the public charge inadmissibility determination.”

This is a valid and essential point of inquiry. From the 1990's, through the Trump administration's 2019 public charge revision and even today, the chilling effect of “public charge” continues to incite fear and harm in immigrant communities. Even lawyers and experts in this area sometimes struggle to mitigate the misinformation and chilling effects, surveys by allies show.²⁹ Further, an analysis of Census Bureau data published in *Health Affairs* found that fear of the public charge test likely caused 2.1 million essential workers and household members to forgo Medicaid, and 1.3 million to forgo SNAP,³⁰ even though most people who were eligible for these benefits would not be, even under the 2019 public charge rule, subject to a public charge test of inadmissibility.³¹

For all of these reasons, it is clear that publishing a narrow and clear rule will not, by itself, be sufficient to fully mitigate the chilling effects. Regardless of the terms of the final rule, marginalized immigrant communities confronting a lack of resources may continue to misinterpret it, and robust communications efforts and trainings of service providers to impact communities will be essential to address public perceptions and misunderstanding more fully.

Diminished access to health care and other critical benefits is impacting families and communities during the pandemic

To make matters significantly worse, the 2019 public charge rule officially went into effect just weeks before the COVID-19 pandemic hit the United States. The fear of seeking public benefit support or health services, paired with the COVID-19 virus, meant that Latino mixed-status household have suffered more drastic health³² and economic³³ impacts since the pandemic began.

Research finds that noncitizens continued to avoid public benefits through 2020, despite the increased need for access to health care and nutrition support created by the pandemic.³⁴ Noncitizens also avoided relief programs created specifically to support families during the pandemic such as Pandemic Electronic Benefits Transfers (P-EBT), a program designed to feed children who were receiving free or reduced priced meals at school, as well as other federal relief programs.³⁵

Compounding the risks, noncitizens also avoided testing, treatment, and vaccines for COVID-19 because of fears of becoming a public charge or providing their personal information might result in deportation.³⁶ The Kaiser Family Foundation found that 35% of respondents—and 63% in the case of potentially undocumented Latino adults—cited concerns that receiving the COVID-19 vaccine would negatively affect their own and/or a family member’s immigration status.³⁷ Similarly, a UnidosUS poll, found that 14% of parents are concerned that getting their child vaccinated against COVID-19 might cause immigration problems for themselves or their family.³⁸

The effects have been disastrous for Latinos. As UnidosUS is documenting, the COVID-19 pandemic continues to disproportionately impact Latinos.³⁹ When compared to white, non-Hispanic persons, Latinos are:

- 1.9 times more likely to contract COVID-19.
- 2.8 times more likely to be hospitalized due to COVID-19.
- 2.3 times more likely to die from the disease.⁴⁰

The disproportionate impact is driven by a combination of factors, in addition to the ones described above. Latinos are more likely to work in “essential” jobs that expose them to the virus,⁴¹ and less likely to have benefits to help them when they become sick, such as comprehensive health insurance⁴² and paid leave.⁴³

Critically, Latinos are also more likely than white, Non-Hispanic individuals to be noncitizens or part of a mixed-status household and, therefore, impacted by the chilling effect created by the public charge rule. As of 2019, one third of Latinos were noncitizens.⁴⁴ While 95% of Latino children are U.S. citizens, approximately half live in a household with at least one noncitizen parent.⁴⁵

Further, the loss of access to safety net programs for Latino children in mixed-status families meant that many lacked proper access to health care and economic support during the COVID-19 pandemic. Children in these families will also be less likely to reap the long-term benefits provided by safety-net programs. As mentioned above, children with access to major safety-net programs have better birth outcomes, overall health, and improved self-sufficiency as an adult with higher earnings and tax contributions.⁴⁶ Addressing these gaps will be essential to our long-term healing as a nation from the costs of the pandemic for both families and children.

The Definition of public charge should be narrow, clear and limit enforcement discretion

In this section, we provide some specific answers to questions and prompts from the ANPRM. Namely, we address the following questions, and provide the same or similar answers as the joint comments with PIF:

1. How should DHS define the term “public charge”?
2. What data or evidence is available and relevant to how DHS should define the term “public charge”?
3. How might DHS define the term “public charge”, or otherwise draft its rule, so as to minimize confusion and uncertainty that could lead otherwise-eligible individuals to forgo the receipt of public benefits?

5. What potentially disproportionate negative impacts on underserved communities (e.g., people of color, persons with disabilities) could arise from the definition of “public charge” and how could DHS avoid or mitigate them?

As noted above, join with the comments of PIF and others in making clear that, through this rule, USCIS must define public charge both clearly and narrowly. A definition of “public charge” which is both clear and narrow reduces the likelihood that the statute is used by consular officers as well as future administrations to directly discriminate against particular groups when a person from that group seeks to enter the country or adjust their status. It also, over time, will reduce the spillover of harms to noncitizens, their families, and whole communities that result from arbitrary enforcement, misconceptions of the rule, and fear.

To meet these goals, DHS should define someone likely to become a public charge for inadmissibility purposes as a person who is “likely to become primarily and permanently reliant on the federal government to avoid destitution.” This would be consistent with congressional intent and the historical understanding of public charge as applying to a narrow set of immigrants who are likely to become a public charge by virtue of being so in need of assistance that they were housed in almshouses and poorhouses for indefinite stays.

This definition is also consistent with caselaw. In 2020, the Second Circuit Court of Appeals relied on the Board of Immigration Appeals’s interpretation of ‘public charge’ to mean a person who is “unable to support herself, either through work, savings, or family ties.”⁴⁷

Under this definition, reliance on the government should not be taken into account unless:

- **The government provides the *primary* source of income.** Many people receive only modest public benefits that supplement their earnings by improving their access to nutrition, health care, and other services. Using these supplemental benefits should never make a person a “public charge” under the rule. In addition, if an individual is relying on a benefit, but is also receiving income from a job or income from other family members in the household, the individual is not *primarily* reliant on the government. The Ninth Circuit Court of Appeals has found, for example, that the concept of public charge did not “encompass” people who used benefits that “were not sufficient to provide basic sustenance.”⁴⁸
- **The reliance is *permanent*.** There are many scenarios where people receive government benefits for a period of time but not permanently: for example, if an individual is currently using a benefit but is about to get a raise or a new job and will no longer access it, or if someone is recovering from a temporary illness or treatment and relying on a federal government benefit to recuperate. The Ninth Circuit also found that public charge had never encompassed persons likely to make “short-term use” of benefits.⁴⁹
- **The reliance is to avoid destitution.** The Board of Immigration Appeals has held that the “ordinary meaning” of the term public charge, refers to individuals “being destitute.”⁵⁰ Likewise, federal courts have held repeatedly in *in forma pauperis* cases that “public charge” and “destitute” are synonymous.⁵¹

This narrow approach would help to prevent a public charge determination from being used as a tool to discriminate and reduces the chilling effect where immigrant families avoid interacting with the

government and forgo needed public benefits for which they are eligible as a consequence of fear and confusion.

F. Public Benefits Considered

2. Which public benefits should be considered as part of a public charge inadmissibility determination?

3. Which public benefits, if any, should not be considered as part of a public charge inadmissibility determination?

As discussed above, we recommend a narrow definition and application of the concept of public charge: which is that a person is “likely to become primarily and permanently reliant on the federal government to avoid destitution.” This definition should guide any assessment of an applicant’s benefit use as described below. We therefore recommend that the public charge notice of proposed rulemaking (NPRM):

- **Consider only two specific, federal programs that provide cash assistance for income maintenance.** Receipt of health care, nutrition, or housing assistance is not an indication that a person is primarily or permanently reliant on the government. The only two programs that could be relevant in determining whether someone is “likely to become primarily and permanently reliant on the federal government to avoid destitution” are cash assistance under TANF and SSI. Receipt of benefits from these programs, by itself, should not make someone a “public charge” under the law.
- **Do not consider Medicaid—even for institutional long-term care—in a public charge determination.** According to the Kaiser Family Foundation, today in the United States, one in three people turning 65 will require nursing home care in their lives, and Medicaid is the primary payer for long-term care in the United States, covering six in 10 nursing home residents.⁵² We should not penalize immigrants for our national policy choices that make Medicaid the only meaningful payer for long-term care and make it difficult to get care at home and force people into institutional care. In addition, including any type of Medicaid benefit is highly likely to confuse people and potentially lead them to forgo health care.
- **Provide clear guidance on how to predict the likelihood of becoming a public charge based on past or current benefits use.** Without such guidance, predicting who is likely to become a public charge “at any time in the future” is an act of speculation that could allow immigration officers to discriminate. The best way to ensure fairness, consistency, and predictability is to instruct adjudicators to look back at an applicant’s use of certain public benefits for a finite lookback period—such as two or three years—as a way of gauging future likelihood. In addition, the I-485 form and its instructions should make clear that applicants only need to provide information about the use of TANF and SSI during the lookback period.
- **Identify and update a list of the programs that do not count in order to minimize the chilling effect.** The regulation should include language that says, that “benefits other than SSI or TANF shall not be considered in a public charge determination.” In the preamble, the NPRM and final rule should name as many as possible of the other types of cash, tax, food, health, housing, employment, nutrition, education, immigration fee waivers, and other benefits that are *not* included as factors in a public charge test and create guidance where additional/new programs can be added as a reliable resource/reference. The guidance should address COVID-related, other disaster-related benefits such as FEMA and the Child Tax Credit, and unemployment insurance benefits in particular; in addition to programs that provide universal basic or guaranteed income to all. The preamble should

state that any omission of a program from this list should not be interpreted by adjudicators and community members to mean that it will be counted.

- **Exclude programs funded completely by state, local, tribal, and territorial governments.** Clarify that state or local government funded programs—even if they provide cash assistance—are exercises of the powers traditionally reserved to the states and are not counted as factors in a public charge test. We recommend this approach because limiting the benefits that may be considered to *two federal benefits* will be easier for adjudicators to administer and to explain to immigrants and their families than a patchwork of state, local and tribal programs, reducing the chilling effect. It will also be easier for state and local eligibility offices to provide information about recent receipt of TANF, rather than any number of other state or local benefits. States and localities have a compelling interest in promoting health and safety that includes providing benefits at their own expense without barriers caused by federal policies. Since these benefits vary significantly by state, specifically naming two federal programs that are relevant will make the public charge rule easier for both immigrants and DHS adjudicators to understand.
- **Exclude family members and sponsors' use of benefits.** Make clear that benefits used by an applicant's family members or sponsors do not count as factors in the applicant's public charge test. This is critical in minimizing the chilling effect of the public charge rule on access to benefits by people, including U.S. citizen children, who are not subject to a public charge determination but whose family members may seek LPR status in the future.
- **Exclude any use of benefits by survivors of domestic violence and other serious crimes and by anyone during public emergencies.** Benefits used by survivors of domestic violence or other serious crimes or used by anyone during natural disasters or other extraordinary circumstances, such as the COVID-19 pandemic or in the aftermath of hurricanes and wildfires, should not be included as factors in a public charge determination. Use of these benefits is due entirely to external events and does not provide any information on the recipient's likelihood of becoming primarily and permanently reliant on government assistance at a future date.
- **Specify that use of benefits as a child or when in an exempt status will not be included in a public charge determination, nor will benefits used when applying for an exempt status, regardless of a person's pathway to legal status.** DHS should propose that benefits received by children—whose long-term economic contributions are generally *bolstered* by childhood receipt of benefits—be excluded from consideration. In addition, benefits received when in an exempt status, such as cash assistance provided to a refugee, should be excluded regardless of a refugee's pathway to legal status. Finally, benefits should be excluded if an individual is applying for an exempt status, for example, if an individual has applied for asylum.

Should you have any questions or need any further information, please contact Melissa McChesney at mmcchesney@unidosus.org.

Sincerely,



Eric Rodriguez
Senior Vice President
UnidosUS

¹ The terms "Hispanic" and "Latino" are used interchangeably by the U.S. Census Bureau and throughout this document to refer to persons of Mexican, Puerto Rican, Cuban, Central and South American, Dominican, Spanish, and other Hispanic descent; they may be of any race. This document may also refer to this population as "Latinx" to represent the diversity of gender identities and expressions that are present in the community.

² Population Reference Bureau analysis of data from the U.S. Census Bureau and the U.S. Centers for Disease Control and Prevention, for UnidosUS, "By the Numbers: Latinos in the Time of Coronavirus," <https://www.unidosus.org/campaigns/coronavirus-covid-19/Latino-COVID-19-Dashboard>.

³ Jens Manuel Krogstad and Luis Noe-Bustamante, *Key facts about U.S. Latinos for National Hispanic Heritage Month*, (Washington, DC: Pew Research Center, September 9, 2021), <https://www.pewresearch.org/fact-tank/2021/09/09/key-facts-about-u-s-latinos-for-national-hispanic-heritage-month/>; Kelly Whitener and Alexandra Corcoran, *Getting Back on Track: A Detailed Look at Health Coverage Trends for Latino Children* (Washington, DC: Georgetown University Center for Children and Families, June 8, 2021), <https://ccf.georgetown.edu/2021/06/08/health-coverage-trends-for-latino-children/>.

⁴ Add citation essential low-income work.

⁵ Marianne Page, *Safety Net Programs Have Long-term Benefits for Children in Poor Households*, (Davis, California: Center for Poverty Research, UC Davis, March 2017), <https://poverty.ucdavis.edu/policy-brief/safety-net-programs-have-long-term-benefits-children-poor-households>.

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- ¹⁶ Department of Justice, Immigration & Naturalization Serv., Inadmissibility and Deportability on Public Charge Grounds: Proposed Rule, 64 Fed. Reg. 28676 (May 26, 1999), <https://www.govinfo.gov/content/pkg/FR-1999-05-26/pdf/99-13188.pdf>.
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