



To: Samantha Deshombres, Chief, Regulatory Coordination Division, Office of Policy and Strategy, U.S. Citizenship and Immigration Services, Department of Homeland Security

RE: DHS Docket No. USCIS-2010-0012

Dear Ms. Deshombres:

Project Bread is a statewide anti-hunger organization committed to preventing and ending hunger in Massachusetts by providing access to affordable, healthy food for those who are hungry today, while also working to eradicate the systemic causes of hunger. The leading cause of hunger in Massachusetts is the high cost of living outpacing wage growth. We have some of the country's most expensive housing, childcare, and utilities. Many families, including those with immigrant members, simply cannot afford to purchase food after all of their bills are paid. For these families, the Supplemental Nutrition Assistance Program (SNAP) is a critical lifeline when facing poverty and food insecurity.

Therefore, we oppose the proposed Department of Homeland Security rule on Inadmissibility on Public Charge Grounds and urge the administration to keep these important basic needs programs free from barriers or stigma that deter access for eligible immigrants.

Recently, a woman from El Salvador visited our staff at the East Boston Neighborhood Health Center. She was interested in applying for SNAP benefits for her children who are eligible citizens. Unfortunately, when she was asked to submit regular verifications she hesitated and ultimately delayed applying despite having two hungry children to feed. When the mother returned, four weeks later, our outreach worker learned the reason for her delay. She was living with an aunt who became afraid due to the client's immigration status. Her aunt had kicked her out of the apartment, leaving the client and her children homeless.

It is unacceptable that a family member would have to base a decision that impacts the health and development of young children over the immigration status of a relative. And it is heartbreaking that two children went hungry for nearly a month before the client worked up the courage to return after she became homeless. Those both eligible and in need of nutrition assistance should not wait until a bad situation turns into an impossible one before getting help.

The economic and societal impact of this cannot be understated. The text of the rule itself outlines the potential harm on page 51,270 of the federal register:

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There are a number of consequences that could occur [...] Disenrollment or foregoing enrollment in public benefits program by aliens otherwise eligible for these programs could lead to:

- *Worse health outcomes, including increased prevalence of obesity and malnutrition, especially for pregnant or breastfeeding women, infants, or children, and reduced prescription adherence;*
- *Increased rates of poverty and housing instability; and*
- *Reduced productivity and educational attainment.*

Project Bread works hard to overcome language and cultural barriers to ensure access to healthy food for all. Policies like the proposed rule significantly undercut efforts to address food insecurity among immigrants and their families by creating confusion and fear among people who need assistance. Aside from those who will be directly impacted, we are very concerned by those who are already impacted by the chilling effect of the proposed rule.

News of a likely “Inadmissibility on Public Charge Grounds” rule broke early in 2017 and we’ve heard from callers, health center patients, and from our partners that households are choosing to withdraw from a variety of safety net programs including SNAP. Massachusetts Budget and Policy Center estimates up to 500,000 people just in Massachusetts may withdraw from food, health care, or housing benefits, whether or not, they or their family would be impacted by the final rule. This estimate includes 130,000 Massachusetts children and 100,000 Massachusetts adults who are U.S. citizens who live in a household with an immigrant family memberⁱ.

Of deeper concern is the message this proposed rule sends to immigrants and their families. Federal nutrition programs not only protect people from abject poverty, but can help people reach their potential and thrive physically, emotionally, and economically. Based on the Census Bureau’s Supplemental Poverty Measure in 2017, SNAP moved 3.4 million people out of poverty. We also know better nutrition leads to higher productivity and stronger academic outcomes.

One third of U.S. born citizens would struggle to avoid being labeled a “public charge” under this new rule.ⁱⁱ Assistance programs exist because we recognize that hard work is not always enough. It benefits our nation when we support our neighbors in tough times if work hours are cut, a loved one gets sick, or a harsh winter leads to making difficult decisions. Immigrants who are eligible for nutrition programs deserve the same helping hand citizens receive without fear. We all benefit economically from this—\$1.70 of economic activity is generated for our local communities for each \$1 spent on SNAP.ⁱⁱⁱ

Project Bread’s work began in 1969 when 2,000 concerned individuals walked to raise funds to feed people in their community through the Walk for Hunger. This year we celebrated 50 years of bringing together a diverse community of over 10,000 people from across the state and region. Participants walked 20 miles and raised funds to “make hunger history”. Their efforts allowed Project Bread to support 315 community food programs in Massachusetts that include food pantries, community meals, community gardens, and other innovative solutions to hunger. This spirit of neighbors helping neighbors regardless of similarities or differences is one that Project Bread carries through all of its work.

In addition to the Walk for Hunger, Project Bread operates the FoodSource Hotline that answers calls from nearly 29,000 food insecure families and individuals across Massachusetts each year. The Hotline connects callers with resources including the ability to begin a SNAP application on the phone. Numerous community-based organizations, including those in healthcare use the FoodSource Hotline as a resource for their clients. We also provide one-on-one SNAP assistance at six community health centers where two full time staff provide case management for patients.



While we are proud of Project Bread's role in providing access to healthy food for those in need, we're acutely aware that emergency food cannot absorb increased demand that would likely result from these policy changes. Families afraid of applying for federal nutrition programs have already begun to turn to food pantries in higher numbers. The charitable network is straining to meet the increased need. Our partners are unable to replace the vital assistance provided by SNAP and other programs.

Project Bread believes that food is a basic right for all. This proposed regulation would force immigrants who are eligible for housing, healthcare, and nutrition benefits to make a heartbreaking choice between those services they have a right to and the ability to stay with their family—lawfully—in this country. **We urge the Department of Homeland Security to dismiss this dangerous proposal.**

Sincerely,



Erin McAleer
President
Project Bread

ⁱ Wagman, N. (2018). *A Chilly Reception: Proposed Immigration Rule Creates Chilling Effect for New Immigrants and Current Citizens*. Boston: Massachusetts Budget and Policy Center.

ⁱⁱ Trisi, D. (2018, September 27). *One-Third of U.S.-Born Citizens Would Struggle to Meet Standard of Extreme Trump Rule for Immigrants*. Retrieved from Center on Budget and Policy Priorities: <https://www.cbpp.org/blog/one-third-of-us-born-citizens-would-struggle-to-meet-standard-of-extreme-trump-rule-for>

ⁱⁱⁱ Rosenbaum, D. (2013). *SNAP is Effective and Efficient*. Washington, DC: Center on Budget and Policy Priorities.