

Samantha Deshommnes, Chief
Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue N.W.
Washington, D.C. 20529-2140

RE: USCIS-2010-0012, RIN 1615-AA22, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds

Dear Ms. Deshommnes:

I write to express strong opposition to the U.S. Department of Homeland Security's proposed rule related to "public charge" grounds for inadmissibility and deportation published in the Federal register on October 10, 2018. The proposed change will diminish children's access to adequate nutrition, reliable health care, and stable housing, all of which will have a detrimental impact on a child's health and well-being.

As the elected County Superintendent of Schools in Sonoma County, California, I am committed to the health, safety, and well-being of all my students, regardless of immigration status. Research is clear: Students cannot learn if they are unhealthy, hungry, or dealing with stress. The proposed change to the public charge rule will result in families forgoing food, health, and housing benefits out of fear that receiving them will jeopardize their legal immigration status. This means more kids will have inadequate nutrition, a lack of routine medical care, and destabilized living conditions. On the immediate end, these factors will contribute to absenteeism, reduced student engagement, increased behavioral issues, and decreased academic performance. Long-term, children are at risk of irreversible damage due to the connection between emotional health and brain development.

The proposed rule change will trigger a widespread "chilling effect." Even those whose immigration status would be unaffected by the proposed rule will be deterred from accessing federal programs such as Medicaid, SNAP/food stamps, and Section 8 housing. The Children's Partnership estimates that up to 628,000 children in California would lose coverage to Medicaid, CHIP, and other means-tested public health insurance, and that 311,000 children would lose access to SNAP/food stamps as a result of the rule

change. School leaders have had to respond to a similar chilling effect over the past couple of years due to other, recent immigration proposals. Following other proposed immigration changes, school leaders in our county and across the state have seen reductions in attendance, family engagement, and immigrant families enrolling in the free and reduced price meals program.

This decision should not be based on bureaucracy or politics, but rather on the fundamental human rights of children to access education and medical care. For the reasons outlined above, I urge the Department of Homeland Security to withdraw its proposed rule in its entirety. Thank you for the opportunity to submit comments. Please do not hesitate to contact me if I can provide further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Herrington". The signature is fluid and cursive, with a large initial "S" and a stylized "Herrington".

Steven D. Herrington, Ph.D.