



NATIONAL COUNCIL OF THE UNITED STATES
SOCIETY OF ST. VINCENT DE PAUL, INC.

Submitted Electronically

December 6, 2018

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

Re: “Inadmissibility on Public Charge Grounds” Notice of Proposed Rulemaking (DHS Docket No. USCIS-2010-0012)

Dear Ms. Deshommnes:

I write on behalf of the National Council of the United States Society of St. Vincent de Paul (SVdP or the Society), in response to the Department of Homeland Security’s (DHS) Notice of Proposed Rulemaking (NPRM) on “Inadmissibility on Public Charge Grounds” (DHS Docket No. USCIS-2010-0012).

The Society is one of the largest and oldest networks of charity in the country. Since its founding in the United States in 1845 (the international order was founded in 1833), the Society has been serving poor and vulnerable people in our communities in whatever form is needed. Today, over 98,000 members of the Society, called Vincentians, serve people in need in over 4,400 communities. In 2017, over \$3.4 billion in cash and in-kind goods and services were given out to over 5.4 million people. Every day, we see first-hand the many ways poor and vulnerable people struggle to survive.

For this reason, we have unique insight into how the proposed rule will affect the people and communities we serve. On behalf of the Society, I urge you to reconsider the proposed rule.

The proposed rule will harm low-income, working legal immigrants and their families in an arbitrary manner: SVdP serves all people according to need, in recognition of each person’s innate human dignity. In the words of our patron, St. Vincent de Paul, “No work of charity is foreign to the Society.” We conduct our work through home visits so that the people we serve feel secure. This ministry gives us unique perspective into the lives and struggles of many immigrants. We are concerned that the rule, if implemented, would increase hardship among the immigrant families we serve, many of whom are employed in difficult, low-wage jobs that do not provide economic security. They rely on federal antipoverty programs and the Society’s assistance to make ends meet.



It concerns me that DHS understands the consequences of the rule on low-income people and families, acknowledging that the rule as implemented could lead to “worse health outcomes, including increased prevalence of obesity and malnutrition, especially for pregnant or breastfeeding women, infants, or children . . . increases in uncompensated care . . . [and] increased rates of poverty and housing instability.”¹ The proper role of government is to ameliorate hardship, not exacerbate it. This is especially true as regards health care. Health care is a human right and lack of access to it is a primary driver of poverty. The NPRM puts affected legal immigrants in the untenable position of choosing the health and well-being of themselves, their children, and their families at the risk of deportation.

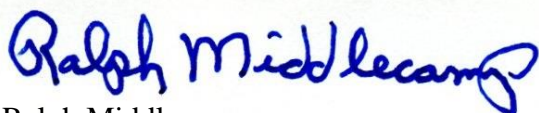
The proposed rule will make it more difficult for individual Vincentians, the Society as an institution, and other antipoverty organizations to pursue their missions: Earlier this year the Census Bureau reported that, despite recent economic gains, in 2017 over 39 million Americans lived in poverty. As stated earlier, last year the Society served 5.4 million people. Much of our assistance takes the form of food, rental and housing support, and addressing family financial crises provoked by inadequate health care. (This is to say nothing of the good work done by hundreds of other service and charitable organizations.) Clearly, the current need in the country and our communities outstrips our capacity. The proposed rule acknowledges an intent to increase reliance of affected people and families on, among others, private charitable organizations, with no evidence to support the assumption that these organizations have the capacity to meet the increased need.²

We do not have that capacity. The increase in the demand for the Society’s assistance and the resources of other community-based organizations will stress and stretch an already-strained social safety net. More will go without.

Many of our members come from families who arrived in the United States as working class immigrants. We are grateful to this country for the opportunities it has afforded us and for the support our families may have received at times. We believe our country is better as a result. We do not believe that creating economic and financial standards for certain classes of people is consistent with Christian or American values.

In Conclusion: DHS proposes a rule that will increase hardship and poverty, and make it harder for those whose serve people in need to do their work. There is no overriding justification for this rule, therefor I would urge DHS to reconsider the proposed rule.

Sincerely,



Ralph Middlecamp
National Council President

¹ See 83 Federal Register at 51270

² See 83 Federal Register at 51122 and 51270

