



WISCONSIN CATHOLIC CONFERENCE

December 7, 2018

Submitted Electronically

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

Re: “Inadmissibility on Public Charge Grounds” Notice of Proposed Rulemaking; RIN 1615-AA22; DHS Docket No. 2010-0012.

Dear Ms. Deshommes,

On behalf of the Catholic Bishops of Wisconsin, the Wisconsin Catholic Conference submits these written comments regarding the Department of Homeland Security (DHS) above-referenced Notice of Proposed Rulemaking concerning inadmissibility on public charge grounds.

For decades, the U.S. government only considered likely dependence on public cash assistance or public long-term medical care when determining whether a person lacked sufficient economic means to enter and remain in the country. The proposed rule would replace this fairly simple test for determining a “public charge” with a much more complex process. The rule would not only penalize based on the use of public benefits, but also based on family size and educational background. The net effect of these changes is to give preference to wealthier immigrants and deprive those of more modest means from even applying.

The proposed rule is inconsistent with our nation’s unique history of welcoming the poor and homeless “yearning to breathe free.” It forgets how millions of impoverished immigrants helped to build the wealthiest nation on earth. It negates the essential role of extended immigrant families in encouraging their members to achieve the American dream. Large families have been instrumental in lifting many out of poverty and combatting social isolation. Today, many immigrant families not only include noncitizens, but also U.S. citizen and lawful permanent resident family members. Denying non-citizen members the opportunity to become citizens or permanent residents restricts a family’s ability to migrate, travel, and thrive collectively and is inhumane. A civilized society rewards, rather than punishes, those who journey to care for children or elderly family members.

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The proposed rule has already caused some immigrants to refuse essential public benefits to which they are entitled, for fear that taking them could negatively impact their ability to obtain or adjust their legal status. Nothing good is to be gained if families in the U.S. go hungry or without health care.

Finally, the rule would put even more pressure on churches and other charities to care for immigrants. The Catholic Church, for example, has been vital in helping to integrate millions of immigrants over our nation's history. However, it cannot replace the state in caring for our nation's most vulnerable residents. Nor should it be called to do so.

For all these reasons, we respectfully urge DHS to withdraw the public charge rule and instead to advance immigration reform that truly respects the life and dignity of all.

Sincerely,



Kim Vercauteren
Executive Director