November x, 2018

Samantha Deshommes

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: Comment from Afterschool Alliance on DHS Docket No. USCIS-2010-0012, Inadmissibility on Public Charge Grounds

Ms. Deshommes,

Thank you for the opportunity to comment on the proposed rule on inadmissibility on public charge grounds. The Afterschool Alliance is a non-profit organization that works to ensure that *all* children and youth have access to quality before school, afterschool and summer learning opportunities. We oppose the changes to the public charge rule proposed by the Department of Homeland Security as they could have serious negative consequences for the 10 million children in afterschool programs throughout the United States, as well as their families and communities.

While we commend the Department on exempting education and child development programs, like 21st Century Community Learning Centers, school and afterschool child nutrition programs, and the Child Care Development Fund from public charge determination, we are concerned that the rule will have negative effects on children and families. Confusion with regard to the rule will negatively affect the health, good nutrition and well-being of children and families. Potential consequences include:

* **Parents may choose not to pursue access to the Children’s Health Insurance Program (CHIP) but** may not be able to afford alternate health care for their children.
* Similarly, families may be wary of school-based Medicaid services, even though their participation is okay under the proposed rule, and therefore may not get adequate health care.

In addition, we are concerned that immigrant families may avoid **participation in** free and reduced price lunch programs, federally funded early childhood education like Head Start, and afterschool and summer programs funded by CCDBG and 21st CCLC. While none of these supports are part of the Administration's "public charge" rule, participation could still drop due to a lack of accurate information or the spread of misinformation. Such inaccurate information could lead to concerns about filling out School Lunch or other applications or accessing the services, which would result in young people missing valuable opportunities to help them reach their full potential.

Lastly, we are concerned in particular about the inclusion of the Supplemental Nutrition Assistance Program (SNAP) as part of the public charge determination. Approximately half of the participants in SNAP are children, and the program is important to education, learning, and child health. The proposed rule will likely increase rates of hunger, poverty, and poor health among immigrant families.

Thank you for the opportunity to provide comments.

Sincerely,

Jodi Grant

Executive Director